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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

**ANTELOPE VALLEY  
GROUNDWATER CASES**

Included Actions:

Los Angeles County Waterworks District No. 40  
v. Diamond Farming Co., Superior Court of  
California, County of Los Angeles, Case No. BC  
325 201; Los Angeles County Waterworks  
District No. 40 v. Diamond Farming Co., Superior  
Court of California, County of Kern, Case No. S-  
1500-CV-254-348; Wm. Bolthouse Farms, Inc.  
v. City of Lancaster, Diamond Farming Co. v.  
City of Lancaster, Diamond Farming Co. v.  
Palmdale Water Dist., Superior Court of  
California, County of Riverside, Case Nos. RIC  
353840, RIC 344436, RIC 344668

) Judicial Council Coordination Proceeding No.  
4408

) Assigned to The Honorable Jack Komar

**RESPONSE OF TEJON RANCHCORP TO  
PROPOSED AMENDED BOUNDARY  
ORDER AND MAP**

) Hearing Date: February 14, 2007

) Time: 9:00 a.m.

) Department: 1

Tejon Ranchcorp has no objection to the Proposed Amended Boundary Order or to the  
outer boundary depicted on the Proposed Amended Jurisdictional Boundary Map filed by the Palmdale  
and Quartz Hill Water Districts on January 30, 2007.

However, the Jurisdictional Boundary Map is superimposed over a "base map" selected  
by the Water Districts. This base map contains much information that is irrelevant to the Jurisdictional  
Boundary, including: parks, railroads, gravel pits, cities, military bases, streets, airports, museums, etc.  
But the proposed map omits two types of hydrogeological information that are important to the progress  
and resolution of this case:

1. Major Faults – The prior researchers of the Antelope Valley Groundwater Basin  
identified major faults that divide the Antelope Valley into sub-basins:

1 "The Antelope Valley drainage basin has been divided into twelve ground-  
2 water subbasins (Fig. 2) on the basis of **faults**, consolidated rocks, ground-  
3 water divides, and, in some cases, arbitrary boundaries (Thayer, 1946;  
4 Bloyd, 1967). The Antelope Valley ground-water basin covers about 920  
mi<sup>2</sup>, and consists of seven of these subbasins: the Buttes, Finger Buttes,  
Lancaster, Neenach, North Muroc, Pearland, and West Antelope (Fig. 2).

5 \* \* \* \*

6 "Antelope Valley contains numerous faults (Fig. 2), some of which  
7 act as partial barriers to ground-water flow." (USGS Report 03-4016,  
8 "Simulation of Ground-Water Flow and Land Subsidence in the Antelope  
9 Valley Ground-Water Basin, California" (2003) pages 6-7.)


10 Consequently, maps of the Antelope Valley Groundwater Basin typically show these recognized faults,  
11 including the Neenach Fault, the Randsburg-Mojave Fault, the Willow Springs Fault, etc., as are shown  
12 on Figure 2 from the above USGS Report (page 5), attached hereto as Exhibit A. These faults are  
13 important geological features that should be included in the Court's map of this groundwater basin.

14 2. Little Buttes – The Proposed Boundary Map depicts numerous buttes in blue  
15 circles – these buttes are not part of the groundwater basin because they consist of raised bedrock areas  
16 that do not bear groundwater. For some reason, the Proposed Boundary Map omits a small but  
17 significant butte named the "Little Buttes" shown on the attached USGS groundwater basin map a bit  
18 south of the Neenach Fault. The Little Buttes should also be depicted on the Court's final boundary  
19 map.

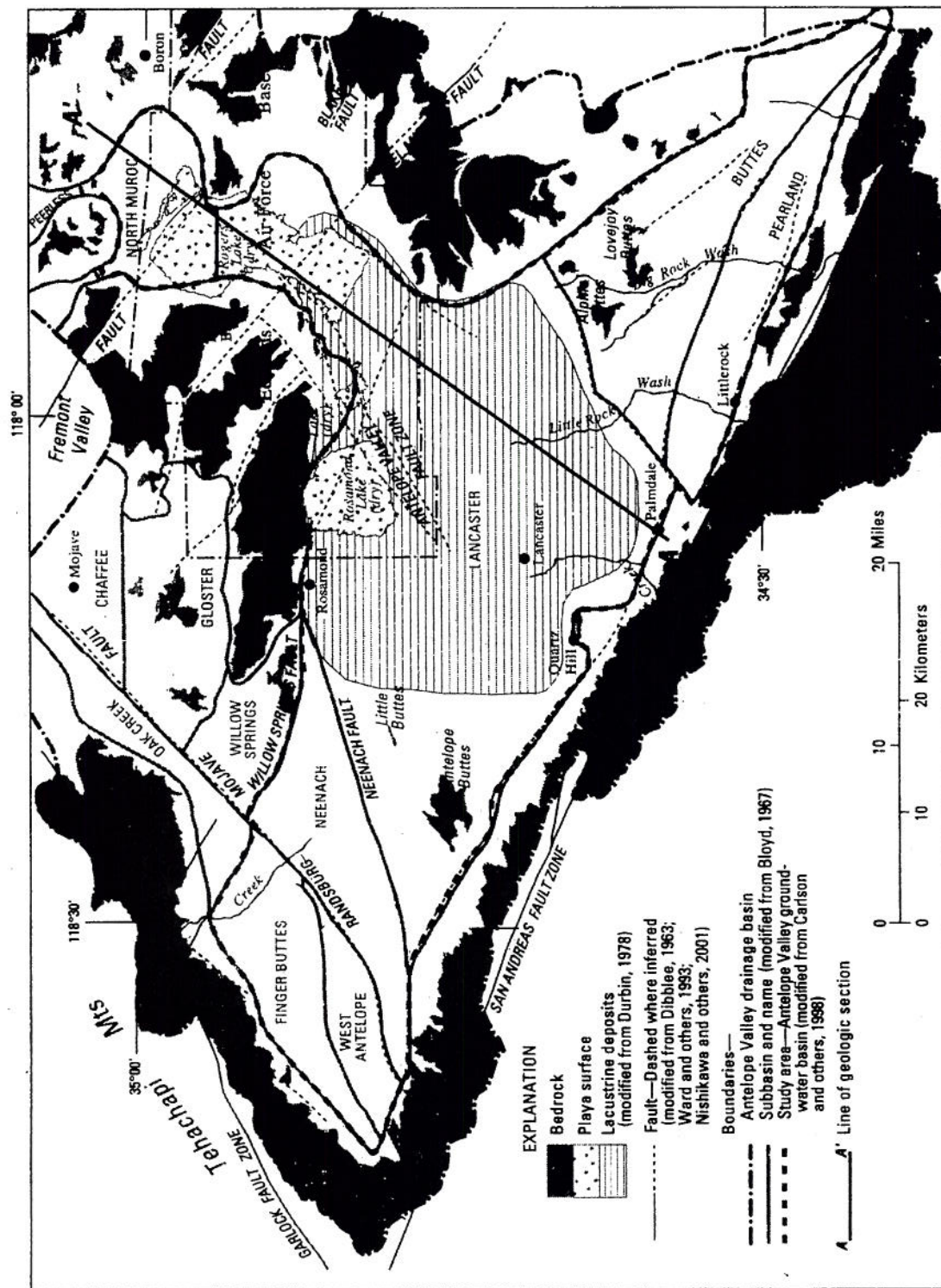
20 By adding the major faults and Little Buttes to this boundary map, it will be more  
21 accurate and more useful to the parties and the Court.

22 DATED: February 7, 2007

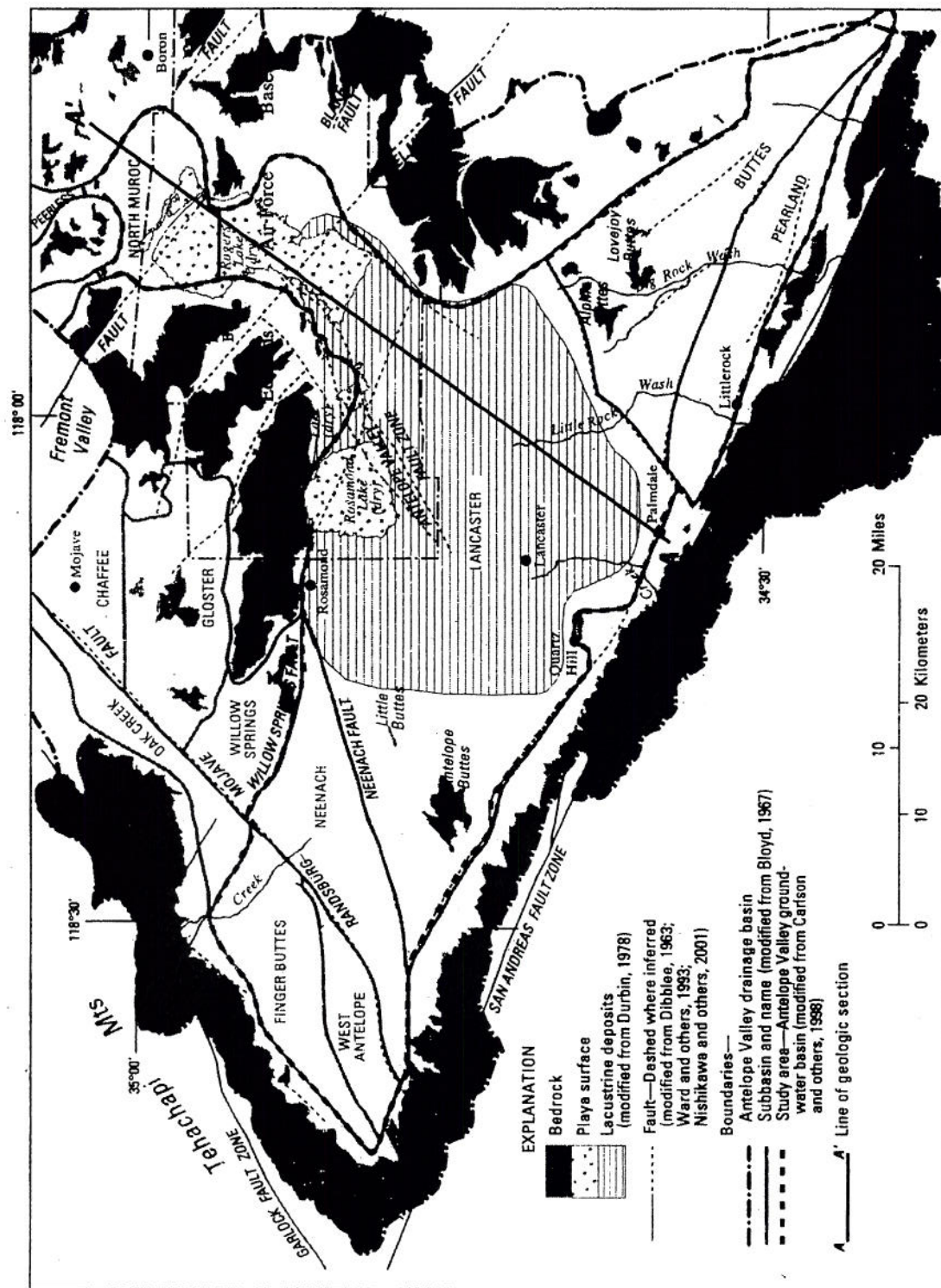
23 NOSSAMAN, GUTHNER, KNOX & ELLIOTT, LLP  
24 HENRY S. WEINSTOCK  
25 FREDERIC A. FUDACZ

26 By:   
27 HENRY S. WEINSTOCK  
28 Attorneys for Tejon Ranchcorp





**Figure 2.** Location of faults, ground-water subbasins, line of geologic section, and approximate areal extent of lacustrine deposits in the Antelope Valley ground-water subbasin, California.



**Figure 2.** Location of faults, ground-water subbasins, line of geologic section, and approximate areal extent of lacustrine deposits in the Antelope Valley ground-water subbasin, California.



1 **PROOF OF SERVICE**

2  
3 The undersigned declares:

4 I am employed in the County of , State of California. I am over the age of 18 and am not a party  
5 to the within action; my business address is c/o Nossaman, Guthner, Knox & Elliott, LLP, 445 S.  
6 Figueroa Street, 31st Floor Los Angeles, California 90071-1602.

7 On **February 7, 2007**, I served the foregoing **RESPONSE OF TEJON RANCHCORP TO**  
8 **PROPOSED AMENDED BOUNDARY ORDER AND MAP** on all interested parties:

9 ( ) (By U.S. Mail) On the same date, at my said place of business, said correspondence was sealed  
10 and placed for collection and mailing following the usual business practice of my said employer.  
11 I am readily familiar with my said employer's business practice for collection and processing of  
12 correspondence for mailing with the United States Postal Service, and, pursuant to that practice,  
13 the correspondence would be deposited with the United States Postal Service, with postage  
14 thereon fully prepaid, on the same date at Los Angeles, California, addressed to:

15 Honorable Jack Komar  
16 Judge of the Superior Court of California  
17 County of Santa Clara  
18 191 North First Street, Department 17C  
19 San Jose, CA 95113

20 (X) (By E-Filing) I posted the document(s) listed above to the Santa Clara County Superior Court  
21 website in regard to the Antelope Valley Groundwater matter in compliance with the Court's  
22 electronic posting instructions and the Court's Clarification Order dated October 27, 2005.

23 (X) (By Overnight Express) I served a true and correct copy by Overnight Express, for delivery on the  
24 next business day. Each copy was enclosed in an envelope or package designated by the express  
25 service carrier; deposited in a facility regularly maintained by the express service carrier or  
26 delivered to a courier or driver authorized to receive documents on its behalf; with delivery fees  
27 paid or provided for; addressed as shown on the service list.

28 Executed on **February 7, 2007** at Los Angeles, California.

(X) (STATE) I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

( ) (FEDERAL) I declare under penalty of perjury under the laws of the United States of America  
that the foregoing is true and correct.

\_\_\_\_\_  
Mitchi Shibata