

EXHIBIT “A”

1 RICHARD G. ZIMMER - SBN 107263
2 T. MARK SMITH - SBN 162370
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4 A Professional Corporation
5 Attorneys at Law
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9 (661) 322-6023

10 Attorneys for Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc.,

11 SUPERIOR COURT OF CALIFORNIA

12 COUNTY OF SANTA CLARA

13 * * *

14 COORDINATION PROCEEDING) Judicial Council Coordination Proceeding
15 SPECIAL TITLE (Rule 1550(b))) No. 4408

16 ANTELOPE VALLEY GROUNDWATER) CASE NO. 1-05-CV-409053
17 CASES)

18 INCLUDED ACTIONS:)

19 LOS ANGELES COUNTY)
20 WATERWORKS DISTRICT NO. 40 v.)
21 DIAMOND FARMING COMPANY, et al.,) DECLARATION OF DAN WILKE
22 Los Angeles Superior Court Case No.) REGARDING WATER USE ON BLUM
23 BC325201) PROPERTY

24 LOS ANGELES COUNTY)
25 WATERWORKS DISTRICT NO. 40 v.)
26 DIAMOND FARMING COMPANY, et al.,)
27 Kern County Superior Court Case No. S-) DATE: April 17, 2012
28 1500-CV-25438) TIME: 9:00 a.m.
DEPT: 1515

DIAMOND FARMING COMPANY, and)
W.M. BOLTHOUSE FARMS, INC., v.)
CITY OF LANCASTER, et al.,)
Riverside Superior Court)
Case No. RIC 344436 [c/w case no. RIC)
344668 and 353840)

5
Digit(s) _____ Page(s) _____ EXHIBIT by _____
ANNETTE HUGHES, CSR #1004.
Date: 2-6-13
Witness: Wilke

1 I, DAN WILKE, declare:

2 1. I am the Irrigation Equipment Manager for Wm. Bolthouse Farms, Inc. I have
3 been employed in this capacity since 2000. Part of my duties is to determine water usage on
4 particular properties.

5 2. I previously was asked to estimate the amount of water usage on the Blum
6 property. I prepared estimates of water use on the Blum property during the time period from
7 2000 to 2007 as set forth on Exhibit "A" which is attached hereto and herein incorporated by
8 reference.

9 **Method of Calculation**

10 3. For a particular year, the crop was determined along with the number of
11 irrigated acres by referring to Planting Schedules. Planting Schedules for 2006 and 2007 are
12 attached as Exhibit "B." I was unable to locate the Planting Schedules for 2000 to 2005. The
13 amount of water estimated to grow the crop, based upon the method of irrigation, was then
14 multiplied by the number of irrigated acres to reach the total acre feet applied. For example, in
15 2002, carrots were grown on 117 irrigated acres. The amount of water estimated to grow the
16 carrots was 3.5 acre feet. $117 \text{ irrigated acres} \times 3.5 \text{ acre feet} = 409.5 \text{ acre feet used}$.


17 **Amount of Water Used on Blum Property**

18 4. The water used on Mr. Blum's property was taken from well AVOL 14-3 on
19 adjacent property because the well on Mr. Blum's property was not serviceable. In 2002, 2003,
20 2004 and 2005, carrots and/or onions were grown on Mr. Blum's property with an estimated
21 water use of 3.5 acre feet. The total amount of water in acre feet used for each one of these
22 years was 409.5 acre feet. The average water use per year for the five (5) year period from
23 2000 to 2004, was 245.7 acre feet ($1,228.5 \text{ acre feet} \div 5 = 245.7 \text{ acre feet average per year}$).

24 5. The water usage on Mr. Blum's property reflected on Exhibit "A" is true and
25 accurate to the best of my knowledge.

26 If called as a witness in this matter, I could testify to the above based upon personal
27 knowledge and based upon information and belief as a result of my position as Irrigation
28 Equipment Manager, and as to such matters I believe them to be true.

1 Executed under penalty of perjury on this 24th day of May, 2012, at Bakersfield,
2 California.

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4 DAN WILKE

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EXHIBIT “A”

Blum Ranch Water Usage

Year	Crop	Acres Irrigated	Ac. Ft. Applied	Total Ac. Ft.	Total Gallons
1999	No Record				
2000	No Record				
2001	Fallow				
2002	Carrots	117	3.5	409.5	133,435,984.50
2003	Carrots	117	3.5	409.5	133,435,984.50
2004	Onions	117	3.5	409.5	133,435,984.50
2005	Onions	117	3.5	409.5	133,435,984.50
2006	Fallow				
2007	Carrots	90	3.15	283.5	92,378,758.50

EXHIBIT “B”

SHORTCUTS															
SEASON 4 - 2006															
LANCASTER															
HARVEST WEEK OF:	SEQ. NUM.	FILE #	GROWER	INTD HARV DATE	H20 DATE	GROW- ING DAYS	INTD GROW DAYS	CARROT HYBRID	ACRES	PLTS/ FT	PROJ. ACRES PER WK.	PLANTED ACRES	EXTRA ACRES	SOIL TYPE	NOTES
			Bum 24-1						0.00						Fallow
TOTAL TO DATE									0.0						
TOTAL NEEDED:									0						

SHORTCUTS

SEASON 4 - 2007

LANCASTER

HARVEST WEEK OF:	SEQ. NUM.	FILE #	GROWER	INTD HARV DATE	H2O DATE	CARROT HYBRID	ACRES	PLT\$/ FT	SOIL TYPE	NOTES
8/26	24	J69128	Blum 21 (24-1)	M 8/19/07	3/9/07	Sugaranez	89.12	117	L/M	
TOTAL TO DATE							89.1			
TOTAL NEEDED:							0.0			