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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

Coordination Proceeding)
Special Title (Rule 1550(b)))
) Judicial Council
ANTELOPE VALLEY GROUNDWATER) Coordination
CASES) Proceeding No. 4408
)
_____)

CONTINUED DEPOSITION OF JAN HENDRICKX, Ph.D., I.R.
Los Angeles, California
Wednesday, January 22, 2014
Volume II

Reported by:
LORI SCINTA, RPR
CSR No. 4811
Job No. 1794014

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL DISTRICT

Coordination Proceeding)
Special Title (Rule 1550(b)))
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)
_____)

Continued Deposition of JAN HENDRICKX, Ph.D.,
I.R., Volume II, taken on behalf of Defendant and
Cross-Complainant Palmdale Water District, at
707 Wilshire Boulevard, Suite 3500, Los Angeles,
California, beginning at 10:23 A.M. and ending at
1:46 P.M. on Wednesday, January 22, 2014, before
LORI SCINTA, RPR, Certified Shorthand Reporter No. 4811.

1 APPEARANCES:

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12 Also Present:

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EXHIBITS

NUMBER	DESCRIPTION	PAGE
Exhibit 1	Notice of deposition	254
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INFORMATION REQUESTED

(None)

REFERENCE REQUESTED

(None)

INSTRUCTION NOT TO ANSWER

(None)

1 Los Angeles, California, Wednesday, January 22, 2014

2 10:23 A.M.

3
4 (Prior to the commencement of the
5 proceedings, Exhibit 1 was marked for
6 identification by the court reporter
7 and is attached hereto.)
8

9 JAN HENDRICKX, Ph.D., I.R.,
10 having been administered an oath, was examined and
11 testified further as follows:
12

13 EXAMINATION (Resumed)

14 BY MR. BUNN:

15 Q Good morning, Dr. Hendrickx.

16 A Good morning.

17 Q You've had your deposition taken before in this
18 case, correct?

19 A Yes, I did.

20 Q And the last time you had it taken was on the
21 topic of return flows, correct?

22 A That is correct, yeah.

23 Q And that's the same topic that you're prepared
24 to testify about in the Phase 5 trial?

25 A Yes, that is correct, on the urban return flow.

1 A Yes, I did.

2 Q And did he have any suggestions to make when
3 you proposed what you were going to do?

4 A No.

5 Q All right. So now with Mr. Fife and
6 Mr. Herrema, have we covered everyone that you've spoke
7 with since your last deposition?

8 A I also talked to Ryan Drake, who is another
9 attorney in Mr. Fife's office. But with him, I only
10 discussed logistical matters.

11 Q Okay. Anyone else?

12 A In the office of BHFS, no.

13 Q Anyone else at all about the work that you're
14 doing?

15 A The one other person that I discussed issues
16 with is Jirka Simunek. I have a small company that is
17 called Soil Hydrology Associates, and it's me,
18 basically. And if I need some assistance about certain
19 issues, then I have associates, colleagues, that work
20 with me; just as sometimes people ask me to do -- answer
21 a quick question for them.

22 And Dr. Simunek is a professor of hydrology at
23 the University of California in Riverside, and he is the
24 builder of the HYDRUS code.

25 And he assisted me a little bit with setting up

1 the HYDRUS code. Basically, I asked him, I said,
2 "Dr. Simunek, this important work. Can you please check
3 my implementation of your code to assure that everything
4 was -- is done correctly?"

5 And that is what he -- he has done.

6 Q Let's pause for a couple of spellings. His
7 name, please.

8 A Jirka is spelled J-i-r-k-a, and Simunek is
9 spelled S-i-m-u-n-e-k.

10 Q And HYDRUS is another acronym, correct? Would
11 you spell that.

12 A HYDRUS is spelled H-Y-D-R-U-S.

13 Q So I do understand that Mr. Simunek looked at
14 your model results?

15 A Yes, he did.

16 Q And critiqued those?

17 A No. There was not much to critique. As a
18 matter of fact, he said the model was running
19 excellently and everything was okay.

20 Q So he validated those results?

21 A He validated that, yeah.

22 Q Just a couple of other preliminary things
23 before we get to the work that you've actually done.

24 Prior to coming in today, did you review the
25 transcript of your deposition, your earlier deposition?

1 to the sewage system. The question there was: How much
2 water would be evaporated and transpire from these
3 effluents before the remainder would be on its way to
4 the ground water table?

5 Q Okay. And I'll delve into each of those
6 issues.

7 Was there anything else besides resolving -- I
8 remember those two outstanding issues.

9 A Yeah. Uh-huh.

10 Q Was there anything else besides resolving those
11 that you did?

12 A No. Basically, I can say my effort was
13 concentrated on these two issues.

14 Q Okay. Very good. Let's take the first one.
15 What happens to the water in the vadose zone?

16 What did you do?

17 A I did the HYDRUS simulations. And we needed to
18 do these HYDRUS simulations because, if we look to
19 agricultural fields, there are -- of course, many
20 simulations have been done by Mr. Wildermuth and others
21 in previous phases of the trial.

22 An agricultural field is really huge and
23 extensive, and so we can assume that water is flowing
24 down as being flowing down to a cylindrical column in
25 one dimension. So we can use a relatively simple model,

1 huh? The one-dimensional version of HYDRUS we could use
2 and a number of other models to evaluate how the water
3 moves from agricultural fields to the ground water
4 table.

5 If we look at urban recharge, we cannot use a
6 one-dimensional model anymore. We need to use a
7 three-dimensional model because we are dealing with a
8 point source. Instead of looking at an ag. field with
9 the dimension of half-a-mile by half-a-mile, here we are
10 looking to a source that is wrapping maybe an area of
11 six-by-six feet with water, or if we look at a backyard,
12 something like 30-by-30 feet.

13 And so we really need to take into
14 consideration the lateral movement of water that will
15 happen if it flows down from the urban land surface to
16 the aquifer. And, in order to do that, I used the
17 HYDRUS 2D/3D code.

18 Q And explain to me what that is.

19 A In what sense?

20 Q Well, it's a ground water model, correct?

21 A No. It is a model that deals with unsaturated
22 as well as saturated flow, whereas regular ground water
23 models deal only with saturated flow.

24 (Discussion off the record.)

25 BY MR. BUNN:

1 MR. FIFE: Okay. Me, too.

2 THE REPORTER: Mr. McElhaney, do you stipulate
3 to that, also?

4 MR. McELHANEY: I so stipulate.

5 And, Mike, when you get a chance, give me a
6 call, please.

7 MR. FIFE: Okay.

8 THE REPORTER: Do you wish to order a copy of
9 the transcript?

10 MR. FIFE: Yes.

11

12 (TIME NOTED: 1:46 P.M.)

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I, JAN HENDRICKX, Ph.D., I.R., do hereby
declare under penalty of perjury that I have read the
foregoing transcript; that I have made any corrections
as appear noted, in ink, initialed by me, or attached
hereto; that my testimony as contained herein, as
corrected, is true and correct.

EXECUTED this _____ day of _____,
20____, at _____, _____.
(City) (State)

JAN HENDRICKX, Ph.D., I.R.
Volume II

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby certify:

3 That the foregoing proceedings were taken
4 before me at the time and place herein set forth; that
5 any witnesses in the foregoing proceedings, prior to
6 testifying, were duly sworn; that a record of the
7 proceedings was made by me using machine shorthand which
8 was thereafter transcribed under my direction; that the
9 foregoing transcript is a true record of the testimony
10 given.

11 Further, that if the foregoing pertains to
12 the original transcript of a deposition in a Federal
13 Case, before completion of the proceedings, review of
14 the transcript [] was [] was not requested.

15 I further certify I am neither financially
16 interested in the action nor a relative or employee of
17 any attorney or party to this action.

18 IN WITNESS WHEREOF, I have this date
19 subscribed my name.

20
21 Dated: 1/27/2014
22
23

24 _____
LORI SCINTA, RPR

25 CSR No. 4811