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5 Palmdale Water District
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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

11 Coordination Proceeding
12 Special Title (Rule 1550 (b))

Judicial Council Coordination
Proceeding No. 4408

13 **ANTELOPE VALLEY GROUNDWATER**
14 **CASES**

[Assigned to The Honorable Jack Komar, Judge
Santa Clara County Superior Court, Dept. 17]

Santa Clara Court Case No. 1-05-CV-049053

**PALMDALE WATER DISTRICT'S
RESPONSE TO DISCOVERY ORDER FOR
PHASE 4 TRIAL**

18
19 Palmdale Water District (District) responds to the court's discovery order as follows:

20 **I.1.** For each parcel of real property the responding party owns or occupies or otherwise
21 controls in the Antelope Valley Adjudication Area, please state with particularity the following
22 information:

23 (A) The Kern County Treasurer Tax Collector's "Assessor Tax Number" or the Los Angeles
24 County Office of the Assessor "Assessor's Identification Number" of the parcel. If the identifying
25 parcel number has changed since 1999, please state both the current and previous number and the date
26 the new identifying parcel number was assigned.

27 **RESPONSE:**

28 See Exhibits A (owned property) and B (leased property).

1
2 **I.1(B)** All record title owners of the parcel from 2000 to the present.

3 **RESPONSE:**

4 See Exhibit B for leased property. All owned property is currently in the name of Palmdale
5 Water District or Palmdale Irrigation District. For prior owners of property purchased since 2000, see
6 Exhibit C.

7
8 **I.1.(C)** Whether a groundwater well existed on the parcel in any or all of calendar years 2000,
9 2001, 2002, 2003, 2004, 2011 or 2012.

10 **RESPONSE:**

11 See Exhibit D.

12
13 **I.1(D)** Whether a groundwater well was operated on the parcel in any or all of calendar years
14 2000, 2001, 2002, 2003, 2004, 2011 or 2012.

15 **RESPONSE:**

16 See Exhibit D.

17
18 **I.1(E)** The amount of groundwater produced from the parcel for calendar years 2000, 2001,
19 2002, 2003, 2004, 2011, and/or 2012.

20 **RESPONSE:**

21 See Exhibit E.

22
23 **I.1(F)** The use(s) to which the groundwater produced from the parcel was put on said parcel in
24 any or all of calendar years 2000, 2001, 2002, 2003, 2004, 2011, or 2012.

25 **RESPONSE:**

26 All water was used within the service area of the District for municipal and industrial and
27 domestic uses. A map of the District's service area is attached as Exhibit D.

1 **I.1 (G)** If groundwater produced from another parcel was used on the parcel during any or all
2 calendar years 2000, 2001, 2002, 2003, 2004, 2011, or 2012, please state the Kern County Treasurer Tax
3 Collector's "Assessor Tax Number" or the Los Angeles County Office of the Assessor "Assessor's
4 Identification Number" of the parcel(s) from which the subject groundwater was produced and identify
5 the owner thereof.

6 **RESPONSE:**

7 Not applicable.
8

9 **I.1 (H)** The use(s) to which the parcel was put during each of calendar years 2011, and 2012.

10 **RESPONSE:**

11 See Exhibits B and F.
12

13 **I.1 (I)** The crop type, if any, grown on the parcel during each of the calendar years 2000, 2001,
14 2002, 2003, 2004, 2011, and 2012.

15 **RESPONSE:**

16 Not applicable.
17

18 **I.1 (J)** If the responding party contends the parcel has groundwater rights based upon something
19 other than groundwater production or use, please state the amount of that claim for each of the calendar
20 years 2000, 2001, 2002, 2003, 2004, 2011, and 2012, and its legal and factual basis therefor.

21 **RESPONSE:**

22 Palmdale Water District asserts rights to groundwater based on the California Constitution,
23 prescriptive rights, rights to return flows, appropriative rights, and California Water Code sections 106,
24 106.3 and 106.5. See responses throughout as to the factual basis.
25

26 **I.1 (K)** State the amount of water rights claimed as the reasonable and beneficial use for each
27 such parcel.

28 **RESPONSE:**

1 The District's water use is not parcel specific. All groundwater produced was for a reasonable
2 and beneficial municipal use, including domestic uses within the District's service area. The District
3 claims all return flows from its State Water Project purchases. See Exhibit E. Additionally, see further
4 responses in sections II and III.

5
6 **I.1 (K)** At the responding party's election any other facts that the responding party contends will
7 assist the Court in determining the amount of groundwater produced from each parcel of land owned or
8 controlled by the responding party in any or all calendar years 2000, 2001, 2002, 2003, 2004, 2011 and
9 2012.

10 **RESPONSE:**

11 In response to this request, the District offers all responses to any requests in this discovery, all
12 documents included with this response, and all evidence admitted in the prior phases of trial.
13 Additionally see the Summary Expert Report from the Public Water Suppliers submitted prior to the
14 Phase 3 trial.

15
16 **I.2.** For each parcel of real property the responding party owned in the Antelope Valley
17 Adjudication Area during calendar years 2000, 2001, 2002, 2003, 2004, 2011 or 2012, please state with
18 particularity the following information:

19 (A) Whether the responding party leased any or all of the parcel.

20 **RESPONSE:**

21 See Exhibit G.

22
23 **I.2. (B)** The name of the lessee.

24 **RESPONSE:**

25 See Exhibit G.

26
27 **I.2. (C)** If the parcel was leased, the Kern County Treasurer Tax Collector's "Assessor Tax
28 Number" or the Los Angeles County Office of the Assessor "Assessor's Identification Number" of the

1 parcel. If the identifying parcel number has changed since 1999, please state both the current and
2 previous number and the date the new identifying parcel number was assigned.

3 **RESPONSE:**

4 See Exhibit G.
5

6 **I.2. (D)** How, if at all, the lease or other written agreement allocated credits for the groundwater
7 produced by the lessee.

8 **RESPONSE:**

9 Not applicable.
10

11 **I.2. (E)** How much, if any, groundwater was produced by the lessee and delivered to another
12 parcel. If so, the Kern County Treasurer Tax Collector's "Assessor Tax Number" or the Los Angeles
13 County Office of the Assessor "Assessor's Identification Number" of the parcel for the year(s) in which
14 such groundwater was produced and delivered.

15 **RESPONSE:**

16 Not applicable.
17

18 **I.2. (F)** If known, the use(s) to which groundwater was put on the leased parcel for calendar
19 years 2011 and 2012.

20 **RESPONSE:**

21 Not applicable.
22

23 **I.3.** For all parcels of land identified in response to Request No. 1 above, please state with
24 particularity the following information:

25 **(A)** All materials constituting the responding party's *prima facie* showing of the amount of
26 groundwater produced from each parcel of land owned or controlled by the responding party in calendar
27 years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

28 **RESPONSE:**

1 See Exhibit E.

2
3 **I.3. (B)** All materials constituting the responding party's *prima facie* showing of the use(s) to
4 which the responding party put each parcel of land controlled by the responding party in calendar years
5 2011 and 2012.

6 **RESPONSE:**

7 See Exhibit B.

8
9 **I.3. (C)** At the responding party's election, any additional materials that will assist the Court in
10 determining the amount of groundwater produced from each parcel of land by the responding party in
11 any or all calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

12 **RESPONSE:**

13 In response to this request, the District offers all responses to prior discovery, all documents
14 included with this response, and all evidence admitted in the prior phases of trial. Additionally see the
15 Summary Expert Report from the Public Water Suppliers submitted prior to the Phase 3 trial.

16
17 **II.1.** Please state with particularity the following information:

18 **(A)** The amount of groundwater the responding party produced in each of the calendar years
19 2000, 2001, 2002, 2003, 2004, 2011, and 2012 over and above any water claimed to have been pumped
20 as an overlying owner.

21 **RESPONSE:**

22 See Exhibit E.

23
24 **II.1. (B)** The Kern County Treasurer Tax Collector's "Assessor Tax Number" or the Los
25 Angeles County Office of the Assessor "Assessor's Identification Number" of the parcel(s) from which
26 the subject groundwater was produced and identify the owner thereof. If the identifying parcel number
27 has changed since 1999, please state both the current and previous number and the date the new
28 identifying parcel number was assigned.

1 **RESPONSE:**

2 See Exhibit D.

3
4 **II.1. (C)** The well identification number(s) for each well that the responding party used to
5 produce groundwater in each of calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

6 **RESPONSE:**

7 See Exhibit D.

8
9 **II.1. (D)** The amount of groundwater produced from each well identified on the responding
10 party's parcels in calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

11 **RESPONSE:**

12 See Exhibit E.

13
14 **II.1. (E)** The methodology used in determining the amount of groundwater produced on the
15 responding party's parcels in each of calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012, e.g.
16 pump tests, meter records).

17 **RESPONSE:**

18 All District wells have had flow meters to measure the amount of water produced from each well
19 since 2000.

20
21 **II.1. (F)** For all groundwater pumping in each of the calendar years 2000, 2001, 2002, 2003,
22 2004, 2011 and 2012 for parcels in Los Angeles County, copies of notices of groundwater extraction
23 filed with the State Water Resources Control Board pursuant to Water Code section 4999 et seq. for
24 each year filed.

25 **RESPONSE:**

26 See Exhibits H to M. The notice is not due yet for 2012.

27
28 **II.1. (G)** State whether the groundwater produced during the identified years was used for any

1 purpose other than municipal supply. If so, state the use(s) to which such water was put in each of the
2 calendar years 2000, 2001, 2002, 2003, 2004, 2011, and 2012.

3 **RESPONSE:**

4 In addition to municipal and industrial and domestic use, the District provides construction water
5 for use within the District boundary. The District sold approximately 2,200 acre-feet of construction
6 water between 2000 and November, 2012.

7
8 **II.1. (H)** The amount of groundwater produced that was used for outdoor irrigation.

9 **RESPONSE:**

10 The District objects to this question because it calls for expert opinion. The District is not such an
11 expert. Subject to and without waiving the foregoing objection, the District responds: Approximately
12 55% of water delivered is used for outdoor irrigation. The amount of groundwater used by the District's
13 customers for outdoor irrigation was an element of the formula that was adopted and incorporated by the
14 court in its calculation of the safe yield one for the Antelope Valley Adjudication Area in its phase 3
15 decision. This amount, the underlying percentages, and the application of those elements to the return
16 flows from imported water, has thus already been determined by the Court. The District incorporates by
17 reference the Court's phase 3 decision, the testimony of expert witnesses Joseph Scalmanini; and the
18 trial exhibits of those experts, in particular the Scalmanini trial exhibits 87, 88, 92, 93, and 96. The
19 amount of groundwater that was used for outdoor irrigation varies based upon the amount of
20 groundwater delivered to responding parties customers. The ratio of outdoor irrigation to total water
21 purchased by responding parties' customers is described in the Summary Expert Report, paragraph 5.1.2
22 and Appendix D.3.3; Appendix E, 3.2.1.1. See attached Table E3-1, from Appendix E. See also Phase 3
23 Trial Exhibits.

24
25
26 **III.1.** Please state with particularity the following information:

27 (A) The amount of the responding party's groundwater pumping that constitutes the production
28 of return flows from **water imported** into the Basin.

1 **RESPONSE:**

2 Zero.

3
4 **III.1. (B)** The amount of return flows from **imported water** the responding party claims to have
5 had a right to pump for each of calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

6 **RESPONSE:**

7 The District objects to this question because it calls for expert opinion. Subject to and without
8 waiving the foregoing objection, the District responds: 39.1% of all water imported by the District. See
9 also Summary Expert Report, Joseph Scalmanini phase three trial testimony dated January 12, 2010
10 (Vol. 3 pages 320-398) and Scalmanini trial exhibits 62, 63, 65, 66, 67, 68, 70, 71, 72, 73, 75, 76, 77, 78,
11 79, 93 and 95. The imported water that constitutes return flows was an element of the formula adopted
12 and incorporated by the Court in its safe yield calculation for the Court's Phase 3 Decision. This
13 amount, the underlying percentages, and their application, have already been determined by the Court.
14 The amount of return flows is also described in the Summary Expert Report, paragraph 4.2.3 and
15 Appendix D.4.2; Appendix E, 3.2.1.1. The formula, is set forth in Appendix F.3. The simplified formula
16 adopted by the Court, and the testimony of expert witnesses Joseph Scalmanini was a recursive 28.1
17 percent, which equals 39.1 percent of all imported water.

18
19 **III.1. (C)** The methodology used for determining the amount of return flows from **imported**
20 **water** the responding party claims to have had a right to pump for each of calendar years 2000, 2001,
21 2002, 2003, 2004, 2011 and 2012.

22 **RESPONSE:**

23 The District objects to this question because it calls for expert opinion. The District is not such an
24 expert. Subject to and without waiving the foregoing objection, see Phase Three trial testimony of
25 Joseph Scalmanini. Specifically, see Scalmanini Phase Three trial testimony found at Volume 3, pages
26 320 through 398, inclusive; and Scalmanini Phase Three trial exhibits 62, 63, 65, 66, 67, 68, 70, 71, 72,
27 73, 75, 76, 77, 78 and 79. Additionally, see Appendix D and Section 4 of the Summary Expert Report
28 produced by the Public Water Suppliers. The imported water that constitutes return flow was an

1 element of the formula adopted and incorporated by the Court in its safe yield findings in the Phase 3
2 trial. This amount, the underlying percentages, and their application have already been determined by
3 the Court.

4
5 **III.1. (D)** The total amount of **water imported** by the responding party in each of calendar
6 years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

7 **RESPONSE:**

8 See Exhibit E.

9
10 **III.1. (E)** Water quality information and water constituents for any and all **imported water** for
11 which the responding party claims a right in each of calendar years 2000, 2001, 2002, 2003, 2004, 2011
12 and 2012.

13 **RESPONSE:**

14 See Exhibits N to P.

15
16 **III.1. (F)** Identify the use(s) to which **imported water** was(were) put in each of calendar years
17 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

18 **RESPONSE:**

19 Municipal and industrial and domestic uses.

20
21 **III.1. (G)** The date(s) on which any and all **imported water** was imported to the Basin in each
22 of calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

23 **RESPONSE:**

24 See Exhibit E.

25
26 **III.1. (H)** The geological conditions below the parcels for which the responding party claims
27 return flow credits/rights from **imported water** in each of calendar years 2000, 2001, 2002, 2003, 2004,
28 2011 and 2012.

1 **RESPONSE:**

2 The District objects to this question because it calls for expert opinion. The District is not such an
3 expert. Subject to and without waiving the foregoing objection, the District responds: See expert
4 testimony of Joseph Scalmanini and Mark Wildermuth from the phase 3 trial and deposition of Kenneth
5 Utley (September 23, 2008). Additionally, see Appendix B and Section 2 of the Summary Expert
6 Report.

7 The geologic conditions were part of the Court's safe yield finding in the Phase 3 trial. Geologic
8 conditions were also incorporated by the Court in its Phase 3 Decision. Responding party incorporates
9 by this reference the Court's Phases 2 and 3 Decisions; the deposition testimony of expert witnesses
10 Kenneth Utley, deposition and trial testimony by expert witness Joseph Scalmanini, and the trial and
11 deposition exhibits of those experts. The District40 claims return flows. The rights are not dependent on
12 where in the Antelope Valley Adjudication Area the imported water is used. Imported water is delivered
13 to the District's customers for use throughout its service area. The Antelope Valley Adjudication Area
14 geology is described in the Public Water Supplier Summary Expert Report, part 3, and also in Appendix
15 B, Figures 3-1 thru 3-5. The cross-sections on Figures 3-6 thru 3-15 also show geologic conditions.

16
17 **III.1. (I)** The distance to the groundwater aquifer from the point any and all claimed **imported**
18 **water** was deposited and the soil types under the deposition point.

19 **RESPONSE:**

20 The District objects to this question because it calls for expert opinion. Subject to and without waiving
21 this objection, this information has previously been disclosed and adjudicated in the Phase Three trial.
22 Reference is made to the expert materials previously provided to the parties and the Court which show
23 the following: The District delivers water to its customers throughout its service area. Those customers
24 use this water for municipal and domestic uses. A portion of the water use is returned to the Basin as
25 return flows. They are described, in detail, in the Summary Expert Report previously provided to the
26 parties. Distance to the groundwater aquifer varies based upon where water is used. Geologic conditions
27 were an element of the formula that was adopted and incorporated by the Court in its safe yield findings.
28 Geologic conditions were also incorporated by the Court in its Phase Two Trial Decision. The District40

1 incorporates by reference the Court's Phase 2 and 3 Trial Decisions; the deposition testimony of expert
2 witness Kenneth Utley, the deposition and trial testimony of Joseph Scalmanini including his trial
3 exhibits. The District claims the return flows from its imported water purchases. The return flows are
4 not dependent on where in the Antelope Valley Adjudication Area the imported water is used. Imported
5 water is delivered to The District's customers who use it throughout its service area. Additionally, the
6 Antelope Valley Adjudication Area geology is described in the Public Water Supplier Summary Expert
7 Report, part 3, and also in Appendix B, Figures 3-1 thru 3-5. The cross-sections on Figures 3-6 thru 3-15
8 also show geologic conditions.

9
10 **III.1. (J)** The amount of time the responding party contends the claimed return flows took to
11 reach the groundwater aquifer from the time of importation to the Antelope Valley.

12 **RESPONSE:**

13 The District objects to this question because it calls for expert opinion. Subject to and without
14 waiving the foregoing objection, the District responds, See expert testimony of Mark Wildermuth in
15 Phase 3. Specifically see phase 3 trial transcript dated January 5, 2011 at pages 31-48 and Wildermuth
16 exhibits 63-70. The amount of time return flows take to reach the groundwater aquifer were an element
17 of the formula that was adopted and incorporated by the court in its safe yield calculation in its phase 3
18 decision.

19
20 **III.1. (K)** Any physical evidence in the responding party's custody, control or possession that
21 return flows augmented the Basin. If such information is in the possession of others, and not produced
22 by the responding party, please provide the contact information of such party.

23 **RESPONSE:**

24 The District objects to this question because it calls for expert opinion. Subject to and without waiving
25 the foregoing objection, see Phase 3 Trial expert testimony and exhibits of Joseph Scalmanini and Mark
26 Wildermuth. Additionally see Kenneth Utley's September 23, 2008 deposition testimony and exhibits .
27 Additionally, see Appendices B and D, and Sections 2 and 4 in the Summary Expert Report.
28

1
2 **III.1. (L)** The geographic location(s) claimed by the responding party that return flows enter the
3 groundwater aquifer.

4 **RESPONSE:**

5 The District objects to this question because it calls for expert opinion. The District is not such an
6 expert. Subject to and without waiving the foregoing objection, the District responds:

7 The return flows from water used by the District enter the aquifer beneath the District's service area (see
8 Exhibit D) and from the facilities of Los Angeles County Sanitation District No. 20. The District
9 delivered water to its customers throughout its service area. Those customers reasonably and
10 beneficially used this water on their parcels for municipal, industrial, and domestic purposes. Where the
11 water enters the aquifer therefore varies based upon where this water was used. The Antelope Valley
12 Adjudication Area is a closed basin; therefore all water calculated to return from the importation of
13 water entered the aquifer. The geologic conditions were an element of the formula that was adopted and
14 incorporated by the court in its calculation of the safe yield for the Antelope Valley Adjudication Area
15 in its phase three decision. The geologic conditions were also incorporated by the court in its phase one
16 and two decisions. The District incorporates by this reference the court's phase one, two and three
17 decisions; the testimony of expert witnesses Kenneth Utley, Joseph Scalmanini; and the trial exhibits of
18 those experts.

19
20 **III.1. (M)** The portion, if any, that the responding party's claimed return flows water entered a
21 municipal sewer system.

22 **RESPONSE:**

23 The District objects to this question because it calls for expert opinion. The District is not such an
24 expert. Subject to and without waiving the foregoing objection, the District responds: The amount
25 imported water that constitutes return flows, a subset of which is return flow that enters a municipal
26 sewer system, was an element of the formula that was adopted and incorporated by the court in its
27 calculation of the safe yield one for the Antelope Valley Adjudication Area in its phase three decision.
28 This amount, the underlying percentages, and the application of those elements to the return flows from

1 imported water, has thus been determined by the court. The District incorporates by this reference the
2 court's phase three decision, the testimony of expert witnesses Joseph Scalmanini; and the trial exhibits
3 of those experts, in particular the Scalmanini trial exhibits 71, 72, 73, 79, 94, 95, and 96. The amount of
4 return flows is also described in the Summary Expert Report, paragraph 4.2.3 and Appendix D.4.2;
5 Appendix E, 3.2.1.1; Appendix F.2. The formula, is set forth in Appendix F.3.

6 Approximately 45% of the water used within the District goes to municipal sewers and septic
7 tanks. Approximately 95% of the District's connections are within the Los Angeles County Sanitation
8 District No. 20 boundaries and the remaining 5% of the District's customers are on private septic
9 systems. Exhibit Q shows the overlay between the District boundary and the Los Angeles County
10 Sanitation District No. 20 boundary.

11
12 **III.1. (N)** The geographic location(s) that municipal wastewater from local public wastewater
13 systems augment the Basin?

14 **RESPONSE:**

15 See Summary Expert Report, Antelope Valley Area of Adjudication, Appendix F.2, which lists the
16 locations as:

17 Lancaster WRP - Paiute Ponds

18 Lancaster WRP - treatment ponds

19 Lancaster WRP area - agric.

20 Palmdale WRP - treatment ponds

21 Palmdale WRP - land application

22 Palmdale WRP area – agric.

23
24 **IV.1.** The United States shall produce a statement on its claims to water based on federal law
25 consistent with security concerns.

26 (A) The amount of its claimed Federal Reserved Right in acre feet of water per year.

27 **RESPONSE:**

28 Not applicable.

1
2 **IV.1. (B)** A statement containing the legal theory upon which its claims to federal reserved
3 water rights are based, including citations of pertinent legal or case authorities and Congressional acts.

4 **RESPONSE:**

5 Not applicable.
6

7 **IV.1. (C)** The factual basis for its claim including a reference to pertinent legal or case
8 authorities and Congressional acts.

9 **RESPONSE:**

10 Not applicable.
11

12 **IV.1. (D)** For lands within Edwards Air Force Base and Air Force Plant 42 that were purchased
13 or otherwise acquired from non-federal sources, the United States will provide detailed information on
14 the acquisitions.

15 **RESPONSE:**

16 Not applicable.
17

18 **IV.1. (E)** A statement on the quantity of water reserved necessary to satisfy the purpose(s) of the
19 reservation.

20 **RESPONSE:**

21 Not applicable.
22

23 **IV.1. (F)** Whether the claimed reservation of groundwater by the Federal Government is
24 expressed or implied.

25 **RESPONSE:**

26 Not applicable.
27

28 **IV.1. (G)** The identity of all lands set aside for the reservation by the Federal Government,

1 including the Kern County Treasurer Tax Collector's "Assessor Tax Number" or the Los Angeles
2 County Office of the Assessor "Assessor's Identification Number" of the parcel(s).

3 **RESPONSE:**

4 Not applicable.

5
6 **IV.1. (H)** Whether the Federal Government claims any portion of Edwards Air Force Base is an
7 original reservation of land that never entered the public domain. If so, describe such portion(s) and
8 why it (they) never entered the public domain.

9 **RESPONSE:**

10 Not applicable.

11
12 **IV.1. (I)** Please provide specific acquisitions of property and the dates of such acquisitions.

13 **RESPONSE:**

14 Not applicable.

15
16 **IV.1. (J)** The amount of surplus groundwater, if any, the Federal Government contends
17 remained in the ANTELOPE VALLEY ADJUDICATION AREA at the time of the reservations of land
18 by the Federal Government for Edwards Air Force Base and the factual basis for such claim.

19 **RESPONSE:**

20 Not applicable.

21
22 **IV.1. (L)** The amount of ground water used on he reserved lands in each of calendar years 2000,
23 2001, 2002, 2003, 2004, 2011 and 2012.

24 **RESPONSE:**

25 Not applicable.

26
27 **IV.1. (M)** The amount of groundwater used on Edwards Air Force Base that are not part of the
28 reserved lands in each of calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

1 **RESPONSE:**

2 Not applicable.

3
4 **IV.1. (N)** The amount of groundwater used to irrigate and operate Muroc Lake Golf Course in
5 each of calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

6 **RESPONSE:**

7 Not applicable.

8
9 **IV.1. (O)** The amount of water used on Edwards Air Force Base by all persons and entities other
10 than the Federal Government in each of calendar years 2000, 2001, 2002, 2003, 2004, 2011 and 2012.

11 **RESPONSE:**

12 Not applicable.

13
14 **V.1.** For each of the items above, please identify the person(s) most qualified to testify on its
15 behalf to the facts alleged and materials produced.

16 **RESPONSE:**

17 Dennis LaMoreaux, General Manager, Palmdale Water District.

18
19 Dated: December 21, 2012

LAGERLOF, SENEAL, GOSNEY & KRUSE, LLP

20
21 By: _____
22 Thomas S. Bunn III
23 Attorneys for Defendant and Cross-Complainant
24 Palmdale Water District
25
26
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LIST OF EXHIBITS

- Exhibit A – District Owned Property
- Exhibit B – District Occupied Property
- Exhibit C – Property Acquired Since 2000
- Exhibit D – Palmdale Water District Well Sites
- Exhibit E – Well Production and SWP Deliveries (2000-Nov.2 2012)
- Exhibit F – Property Use Table
- Exhibit G – Palmdale Water District Property Leased to Others
- Exhibit H – 2000 Annual Notices of Groundwater Extraction
- Exhibit I – 2001 Annual Notices of Groundwater Extraction
- Exhibit J – 2002 Annual Notices of Groundwater Extraction
- Exhibit K – 2003 Annual Notices of Groundwater Extraction
- Exhibit L – 2004 Annual Notices of Groundwater Extraction
- Exhibit M – 2011 Annual Notices of Groundwater Extraction
- Exhibit N – SWP Water Quality Data
- Exhibit O – SWP Water Quality Data
- Exhibit P – SWP Water Quality Data
- Exhibit Q – District boundary and LACSD No. 20 boundary
- Exhibit R – Verification

VERIFICATION

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, Matthew Knudson, the undersigned, say: I am the Engineering Manager of Palmdale Water District, the Plaintiff and Cross-Defendant in the above-entitled proceedings; I have read the foregoing **PALMDALE WATER DISTRICT'S RESPONSE TO DISCOVERY ORDER FOR PHASE 4 TRIAL** and know the contents thereof; and I certify that the same is true of my own knowledge, except as to those matters which are therein stated upon my information or belief, and as to those matters I believe the same to be true.

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

Executed on December 21, 2012, at Palmdale, California.

Matthew Knudson, Engineering Manager
Palmdale Water District