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Exempt from filing fees
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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF LOS ANGELES

12
13 **ANTELOPE VALLEY**
14 **GROUNDWATER CASES**

Judicial Council Coordination No. 4408

CLASS ACTION

15 Included Actions:

16 Los Angeles County Waterworks District
17 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Los
Angeles, Case No. BC 325201;

Santa Clara Case No. 1-05-CV-049053
Assigned to The Honorable Jack Komar

18 Los Angeles County Waterworks District
19 No. 40 v. Diamond Farming Co., Superior
Court of California, County of Kern, Case
20 No. S-1500-CV-254-348;

DECLARATION OF JARED SCOTT
REGARDING 2011 AND 2012
GROUNDWATER PUMPING AT
AIR FORCE PLANT 42

21 Wm. Bolthouse Farms, Inc. v. City of
22 Lancaster, Diamond Farming Co. v. City of
Lancaster, Diamond Farming Co. v.
23 Palmdale Water Dist., Superior Court of
California, County of Riverside, Case Nos.
24 RIC 353 840, RIC 344 436, RIC 344 668

I, Jared Scott, declare:

Property Ownership and Parcel Size

Water Meter Records

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1 operator for each site. Fire protection wells on Sites 5 and 6 are not metered. Bates-numbered
2 documents USAF007285-7308; USAF007309-7312; USAF007323-7328; and USAF011073-
3 12535 in the U.S. Document Production contain true and correct copies of the records for the
4 water meters on Sites 1-4 and 7-8 for the years 2011 and 2012. The meter data is collected and
5 recorded by contractor employee personnel in the ordinary course of the contractor's business.

6 8. Wells FW-2B and FW-2C on Sites 5 and 6 serve the Fire Water protection system
7 at AFP 42. Both wells pump directly into the North Fire Water Storage Reservoir, which is a
8 one million gallon, above ground, 88 foot diameter closed steel tank. The primary use of this
9 water system is to maintain adequate quantity and pressure of water in AFP 42's fire protection
10 system to serve facility fire protection systems and fire hydrants in fire response operations. This
11 system does not serve domestic purposes and therefore is not treated, sampled and metered for
12 use as are the domestic systems on the plant. As this system is not treated to domestic standards,
13 the fire water system is also used to supply water for construction, facility rehabilitation and
14 facility maintenance purposes.

15 9. I have developed an engineering estimate of water production from these fire
16 protection wells because of the lack of water meters on this system. This engineering estimate is
17 based on observed water levels within the storage tank. U.S. Air Force Facility Engineering
18 staff, within my organization, is responsible for the day to day operation of this system, which
19 includes maintaining water levels in the water storage reservoirs. The operator responsible for
20 this system reports that the water level in the north side tank, which is served by the fire
21 protection wells, drops between 0.5 to 1 foot per day during days with no reported draws for fire
22 system flushing/testing and/or draws for construction/maintenance purposes. These draws are
23 more variable, but often exceed 2 feet of additional drop per day. Therefore, my engineering
24 estimate is based on a tank drop of 1.25 feet per day. 1.25 feet of water in an 88 foot diameter
25 tank equates to 56,872 gallons. For a year, this equates to 20.8 million gallons, which I have
26 rounded to 21 million gallons per year or 64.45 acre-feet per year.
27
28


1 10. Exhibit B sets forth the total yearly production amounts by APN for metered
2 water wells and the fire protection wells on the above referenced properties for the years
3 2011 and 2012. A true and correct copy of Exhibit B is attached hereto and incorporated herein.

4 **Use of Water**

5 11. The United States used 458.37 acre feet of water (groundwater and Palmdale
6 Water District water) on the above identified APNs in 2011. Of the amount of water used in
7 2011, 407.34 acre feet were pumped and used from the groundwater underlying AFP 42. The
8 water was used for the following military purposes in connection with AFP 42: Water at AFP 42
9 was used for domestic, industrial, construction and fire protection purposes to support the
10 military mission of providing industrial base capacity and common area infrastructure to
11 develop, manufacture, sustain and flight-test aerospace systems. Examples include supplying
12 water to industrial production facilities, aircraft production, aircraft sustainment, fire protection
13 systems, office buildings, drinking water, irrigation of landscaping and Heating Ventilation &
14 Climate Control (HVAC) systems.

15 12. The United States used 446.49 acre feet of water (groundwater and Palmdale
16 Water District water) on the above identified APNs in 2012. Of the amount of water used in
17 2012, 391.37 acre feet were pumped and used from the groundwater underlying AFP 42. The
18 water was used for the following military purposes in connection with AFP 42: Water at AFP 42
19 was used for domestic, industrial, construction and fire protection purposes to support the
20 military mission of providing industrial base capacity and common area infrastructure to
21 develop, manufacture, sustain and flight-test aerospace systems. Examples include supplying
22 water to industrial production facilities, aircraft production, aircraft sustainment, fire protection
23 systems, office buildings, drinking water, irrigation of landscaping and Heating Ventilation &
24 Climate Control (HVAC) systems.

1 I declare under penalty of perjury under the laws of the State of California that the foregoing is
2 true and correct. Executed this 28th day of May 2013, at Wright-Patterson AFB OH.

3
4 
5 Jared Scott

