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10	STIDEDIOD COLIDT OF	THE STATE OF CALIFORNIA					
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12	FOR THE COUNTY OF LOS ANGELES						
13							
14	ANTELOPE VALLEY GROUNDWATER CASES	Judicial Council Coordination No. 4408					
15	Included Actions:	CLASS ACTION					
16	Los Angeles County Waterworks District	Santa Clara Case No. 1-05-CV-049053					
	No. 40 v. Diamond Farming Co., Superior Court of California, County of Los	Assigned to The Honorable Jack Komar					
17	Angeles, Case No. BC 325201;						
18	Los Angeles County Waterworks District	DECLARATION OF JARED SCOTT REGARDING 2011 AND 2012					
19	No. 40 v. Diamond Farming Co., Superior Court of California, County of Kern, Case	GROUNDWATER PUMPING AT					
20	No. S-1500-CV-254-348;	AIR FORCE PLANT 42					
21	Wm. Bolthouse Farms, Inc. v. City of Lancaster, Diamond Farming Co. v. City of						
22	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						
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DECLARATION

I, Jared Scott, declare:

1. I am Chief, Industrial Facilities Branch, Acquisition Environmental and Industrial Facilities Division, Agile Combat Support Directorate, Air Force Life Cycle Management Center, Wright Patterson Air Force Base (WPAFB), Ohio. I am the industrial facility engineering and real property technical authority for all Air Force owned Industrial Plants, including Air Force Plant 42 (AFP 42). The United States is a party to this action. In lieu of deposition testimony for the Phase 4 trial, I am providing this declaration. I have personal knowledge of each fact herein, or have obtained these facts from staff working under my direction or the business records of AFP 42 and would testify competently thereto under oath.

Property Ownership and Parcel Size

- 2. The United States owns property known as AFP 42 that overlies the Antelope Valley Area of Adjudication as decided by this Court. The land is in Los Angeles County within the adjudication area, and is identified by the APNs described in Exhibit A attached hereto and incorporated herein by reference.
- 3. With respect to AFP 42, the United States claims groundwater rights only as to the properties listed in Paragraph 2 and Exhibit A.
 - 4. AFP 42 is 5,349.53 acres in size. Total acreage by APN is provided in Exhibit A.
- 5. The United States of America currently owns the entire AFP 42 property and has owned the property since at least January 1, 2000.
- 6. The United States is the only individual/entity appearing on the title for the above identified APNs from January 1, 2000 to the present.

Water Meter Records

7. AFP 42 is divided into eight operating sites, numbered Site 1 through Site 8. Six of the sites are leased to aerospace contractors. These are Site 1 (The Boeing Company), Sites 2, 7, 8 (Lockheed Martin Corporation), Sites 3 and 4 (Northrop Grumman Corporation). The U.S. Air Force operates Sites 5 and 6, which are the common areas. Groundwater production is measured on Sites 1-4 and 7-8 by water meters operated and maintained by the contractor lease

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

- 8. Wells FW-2B and FW-2C on Sites 5 and 6 serve the Fire Water protection system at AFP 42. Both wells pump directly into the North Fire Water Storage Reservoir, which is a one million gallon, above ground, 88 foot diameter closed steel tank. The primary use of this water system is to maintain adequate quantity and pressure of water in AFP 42's fire protection system to serve facility fire protection systems and fire hydrants in fire response operations. This system does not serve domestic purposes and therefore is not treated, sampled and metered for use as are the domestic systems on the plant. As this system is not treated to domestic standards, the fire water system is also used to supply water for construction, facility rehabilitation and facility maintenance purposes.
- 9. I have developed an engineering estimate of water production from these fire protection wells because of the lack of water meters on this system. This engineering estimate is based on observed water levels within the storage tank. U.S. Air Force Facility Engineering staff, within my organization, is responsible for the day to day operation of this system, which includes maintaining water levels in the water storage reservoirs. The operator responsible for this system reports that the water level in the north side tank, which is served by the fire protection wells, drops between 0.5 to 1 feet per day during days with no reported draws for fire system flushing/testing and/or draws for construction/maintenance purposes. These draws are more variable, but often exceed 2 feet of additional drop per day. Therefore, my engineering estimate is based on a tank drop of 1.25 feet per day. 1.25 feet of water in an 88 foot diameter tank equates to 56,872 gallons. For a year, this equates to 20.8 million gallons, which I have rounded to 21 million gallons per year or 64.45 acre-feet per year.

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

Use of Water

- 11. The United States used 458.37 acre feet of water (groundwater and Palmdale Water District water) on the above identified APNs in 2011. Of the amount of water used in 2011, 407.34 acre feet were pumped and used from the groundwater underlying AFP 42. The water was used for the following military purposes in connection with AFP 42: Water at AFP 42 was used for domestic, industrial, construction and fire protection purposes to support the military mission of providing industrial base capacity and common area infrastructure to develop, manufacture, sustain and flight-test aerospace systems. Examples include supplying water to industrial production facilities, aircraft production, aircraft sustainment, fire protection systems, office buildings, drinking water, irrigation of landscaping and Heating Ventilation & Climate Control (HVAC) systems.
- 12. The United States used 446.49 acre feet of water (groundwater and Palmdale Water District water) on the above identified APNs in 2012. Of the amount of water used in 2012, 391.37 acre feet were pumped and used from the groundwater underlying AFP 42. The water was used for the following military purposes in connection with AFP 42: Water at AFP 42 was used for domestic, industrial, construction and fire protection purposes to support the military mission of providing industrial base capacity and common area infrastructure to develop, manufacture, sustain and flight-test aerospace systems. Examples include supplying water to industrial production facilities, aircraft production, aircraft sustainment, fire protection systems, office buildings, drinking water, irrigation of landscaping and Heating Ventilation & 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 o									
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