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 7 *Department of Fish and Wildlife*

EXEMPT FROM FILING FEES
 PER GOV. CODE § 6103

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 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 10 COUNTY OF LOS ANGELES

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 12 **SANTA BARBARA CHANNELKEEPER,**
 Petitioner,
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 v.
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 15 **STATE WATER RESOURCES CONTROL**
BOARD, a California State Agency; CITY
OF BUENAVENTURA, a California
municipal corporation,
 Respondents,
 17
 18 **CITY OF SAN BUENAVENTURA, a**
California municipal corporation,
 Cross-Complainant,
 19
 v.
 20
 21 **DUNCAN ABBOTT, an individual; et al.,**
 Cross-Defendants.
 22

Case No. 19STCP01176
**CALIFORNIA DEPARTMENT OF FISH
 AND WILDLIFE'S INITIAL
 DISCLOSURES**
 Dept.: 10
 Judge: Honorable William F. Highberger
 Trial Date: None Set
 Action Filed: September 19, 2014

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 24 **TO ALL PARTIES HEREIN AND TO THEIR RESPECTIVE ATTORNEYS OF**
 25 **RECORD:**

26 Intervenor California Department of Fish and Wildlife (the "Department") hereby submits
 27 the following initial disclosures pursuant to California Code of Civil Procedure section 842. The
 28 Department makes these disclosures after reasonable investigation and based on information

1 reasonably available to it at the time of these disclosures. The Department reserves the right to
2 supplement these disclosures as discovery and investigation continue. By these disclosures, the
3 Department in no way waives its rights to rely on documents or other information which have not
4 been included in these initial disclosures due to good faith oversight, mistake, inadvertence, or
5 other justifiable reasons.

6 By providing the information set forth herein, the Department does not waive any
7 privileges or protections that may be related to any information or documents discussed herein,
8 including, but not limited to, the attorney-client privilege, attorney work product doctrine, and the
9 right of privacy, all of which are expressly claimed and reserved.

10 The Department provides the following information:

11 The Department's name and mailing address is:

12 California Department of Fish and Wildlife
13 P.O. Box 944209
14 Sacramento, CA 94244-2090

15 The Department should be contacted through counsel.

16 The Department's counsel is:

17 Noah Golden-Krasner
18 Deputy Attorney General
19 Eric M. Katz
20 Supervising Deputy Attorney General
21 California Attorney General's Office
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27 The Department has not extracted any groundwater or diverted any surface water in the
28 previous ten years in the Ventura River watershed, and does not claim any water rights in the
29 Ventura River watershed. The Department is the state agency with jurisdiction over the
30 conservation, protection, and management of fish, wildlife, and plant resources in the State of
31 California, including the fish, wildlife and habitat at issue in

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1 this case. Therefore, there is no need for a response from the Department on the items described
2 in subsections (a)(2) through (a)(12) of Code of Civil Procedure section 842.

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Dated: May 28, 2021

Respectfully Submitted,
ROB BONTA
Attorney General of California
ERIC M. KATZ
Supervising Deputy Attorney General




NOAH GOLDEN-KRASNER
Deputy Attorney General
Attorneys for Intervenor California
Department of Fish and Wildlife

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VERIFICATION

I, Erinn Wilson-Olgin, am an Environmental Program Manager with the California Department of Fish and Wildlife, and I am authorized to make this verification on its behalf. I have read the foregoing CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE'S INITIAL DISCLOSURES and know its contents. I am informed and believe that the matters stated therein are true, and I have personal knowledge regarding the truthfulness of the matters stated therein. On these grounds, I certify and declare under penalty of perjury under the laws of the State of California that the same are true and correct. This verification is executed May 27, 2021, at Los Alamitos, California.



Erinn Wilson-Olgin
Environmental Program Manager
California Department of Fish and Wildlife
South Coast Region

LA2019600071