

1 SHAWN D. HAGERTY, Bar No. 182435  
shawn.hagerty@bbkllaw.com  
2 BEST BEST & KRIEGER LLP  
655 West Broadway  
3 15th Floor  
San Diego, California 92101  
4 Telephone: (619) 525-1300  
Facsimile: (619) 233-6118

EXEMPT FROM FILING FEES PURSUANT  
TO GOVERNMENT CODE SECTION 6103

**FILED**  
Superior Court of California  
County of Los Angeles

**JUN 25 2021**

Sherri B. Carter, Executive Officer/Clerk of Court  
By Brigitte De La Rosa, Deputy  
Brigitte De La Rosa

FILED

5 CHRISTOPHER MARK PISANO, Bar No. 192831  
christopher.pisano@bbkllaw.com  
6 SARAH CHRISTOPHER FOLEY, Bar No. 277223  
sarah.foley@bbkllaw.com  
7 PATRICK D. SKAHAN, Bar No. 286140  
Patrick.Skahan@bbkllaw.com  
8 BEST BEST & KRIEGER LLP  
300 South Grand Avenue  
9 25th Floor  
Los Angeles, California 90071  
10 Telephone: (213) 617-8100  
11 Facsimile: (213) 617-7480

12 Attorneys for Respondent and Cross-Complainant  
CITY OF SAN BUENAVENTURA

13  
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 COUNTY OF LOS ANGELES

16 SANTA BARBARA CHANNELKEEPER, a  
California non-profit corporation,  
17  
18 Petitioner,  
19 v.  
20 STATE WATER RESOURCES CONTROL  
BOARD, et al.,  
21 Respondents.

Case No. 19STCP01176  
Judge: Hon. William F. Highberger  
RESPONDENT AND CROSS-  
COMPLAINANT CITY OF SAN  
BUENAVENTURA'S INITIAL LIST OF  
DOCUMENTS SUPPORTING  
INTERCONNECTIVITY SUBMITTED AT  
THE REQUEST OF THE COURT

22  
23 CITY OF SAN BUENAVENTURA, et al.,  
24 Cross-Complainant,  
25 v.  
26 DUNCAN ABBOTT, an individual, et al.,  
27 Cross-Defendants.

Action Filed: Sept. 19, 2014  
Trial Date: February 14, 2022

BEST BEST & KRIEGER LLP  
ATTORNEYS AT LAW  
655 WEST BROADWAY, 15TH FLOOR  
SAN DIEGO, CALIFORNIA 92101

06/29/2021

1 In accordance with the Court's request at the June 21, 2021 Status Conference,  
2 Respondent and Cross-Complainant City of San Buenaventura (City) submits the following initial  
3 list of documents and presentations that support interconnection between groundwater and surface  
4 water in the Ventura River Watershed. The City is providing this information at the request of  
5 the Court and without prejudice to the City's ability to add, subtract, or delete references in the  
6 future, and without, in any manner, waiving any privileges that exist regarding the City's expert  
7 testimony or information. The City reserves all of its rights regarding the issues to be heard in the  
8 Phase One trial and provides this list of existing documents to the Parties pursuant to the Court's  
9 request.

10 1. California Department of Water Resources (DWR), Statement of Findings  
11 Regarding the Disapproval of the Ojai Valley Alternative, November 12, 2019, with Exhibit A -  
12 Sustainable Groundwater Management Program Alternative Assessment Staff Report, issued July  
13 17, 2019, available at  
14 [https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Alternatives/Files/10year/OjaiValley/02_Ojai_StatementofFindings_Exhibit_a_y19.pdf)  
15 [Management/Sustainable-Groundwater-](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Alternatives/Files/10year/OjaiValley/02_Ojai_StatementofFindings_Exhibit_a_y19.pdf)  
16 [Management/Alternatives/Files/10year/OjaiValley/02\\_Ojai\\_StatementofFindings\\_Exhibit\\_a\\_y19.](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Sustainable-Groundwater-Management/Alternatives/Files/10year/OjaiValley/02_Ojai_StatementofFindings_Exhibit_a_y19.pdf)  
17 pdf.

18 2. California State Water Resources Control Board (SWRCB), Ventura River  
19 Watershed Modeling Webinar 2: Groundwater-Surface Water Model: Water Supply and Demand.  
20 May 19, 2021, available at  
21 <https://youtube.com/embed/KjixHeV5rDg?modestbranding=1&rel=0&autoplay=1>

22 3. SWRCB, Ventura River Watershed Modeling Webinar 3: Groundwater-Surface  
23 Water Model: Model Calibration. June 9, 2021, available at  
24 <https://youtube.com/embed/oJjA7y9xKtQ?modestbranding=1&rel=0&autoplay=1>

25  
26 ///

27  
28 ///

1           4.       Daniel B. Stephens & Associates, Inc., Hydrologic Assessment San Antonio Creek  
2 Sub-Watershed, Ventura County, California. Prepared for Golden State Water Company and  
3 County of Ventura Watershed Protection District. June 22, 2006, available at  
4 <http://obgma.com/wp->

5 [content/uploads/2015/05/GSW\\_WPD\\_San\\_Antonio\\_Crk\\_Hydro\\_Assessment\\_2006.pdf](http://obgma.com/wp-content/uploads/2015/05/GSW_WPD_San_Antonio_Crk_Hydro_Assessment_2006.pdf)

6           5.       Daniel B. Stephens & Associates, Inc., Groundwater Budget and Approach to a  
7 Groundwater Management Plan Upper and Lower Ventura River Basin. Prepared for Ventura  
8 County Watershed Protection District. December 30, 2010, available at  
9 <http://friendsofventurariver.org/wp-content/themes/client-sites/venturariver/docs/vcwpd-ventura->  
10 [river-upper-lower-basin-groundwater-budget-mgmt-plan.pdf](http://friendsofventurariver.org/wp-content/themes/client-sites/venturariver/docs/vcwpd-ventura-river-upper-lower-basin-groundwater-budget-mgmt-plan.pdf)

11           6.       Daniel B. Stephens & Associates, Inc., Groundwater Model Development – Ojai  
12 Basin, Ventura County, California. Prepared for Ojai Basin Groundwater Management Agency.  
13 November 15, 2011, available at <https://www.imanageshare.com/pd/4LS00bI51aq>

14           7.       Daniel B. Stephens & Associates, Inc., Ojai Basin Groundwater Model - Extended  
15 Model Simulations. August 6, 2014, available at  
16 [http://www.obgma.com/15/pdf/OBGMA\\_Tech\\_Memo\\_8-6-14.pdf](http://www.obgma.com/15/pdf/OBGMA_Tech_Memo_8-6-14.pdf)

17           8.       Entrix, Inc., Surface Water-Groundwater Interaction Report for the Ventura River  
18 Habitat Conservation Plan. Prepared for Casitas Municipal Water District, City of San  
19 Buenaventura, Ventura County Flood Control District, Ventura County Transportation  
20 Department, Ventura County Solid Waste Management Department, Ojai Valley Sanitary  
21 District, Ventura River County Water District, Ojai Basin Ground Water Management Agency,  
22 Meiners Oaks County Water District, and Southern California Water Company. February 12,  
23 2001, available at

24 <http://friendsofventurariver.org/wp-content/themes/client-sites/venturariver/docs/ventura-river->  
25 [hcp-surface-groundwater-interaction-rpt.pdf](http://friendsofventurariver.org/wp-content/themes/client-sites/venturariver/docs/ventura-river-hcp-surface-groundwater-interaction-rpt.pdf)

26           9.       Hopkins Groundwater Consultants, Inc., Preliminary Hydrogeological Study,  
27 Foster Park Wellfield Design Study, Ventura, California. Prepared for City of San Buenaventura.  
28 August 2009, available at <https://www.imanageshare.com/pd/4LS00bI51aq>

1           10.     Hopkins Groundwater Consultants, Inc., Preliminary Hydrogeological Study,  
2 Surface Water/Groundwater Interaction Study, Foster Park. Prepared for the City of Ventura.  
3 Hopkins Groundwater Consultants. December 2010, available at  
4 <https://www.imanageshare.com/pd/4LS00bI51aq>

5           11.     Hopkins Groundwater Consultants, Inc., Preliminary Hydrogeological Study,  
6 Surface Water/Groundwater Interaction Study, Foster Park. Prepared for the City of Ventura.  
7 Hopkins Groundwater Consultants. June 2013, available at  
8 <https://www.imanageshare.com/pd/4LS00bI51aq>

9           12.     Kear Groundwater, Surface and Groundwater Interaction Southwest Ojai Basin.  
10 Presentation for the Ojai City Council Meeting. February 23, 2021, available at  
11 <https://www.youtube.com/watch?v=fvJkOz7D7mM>

12           13.     Kear Groundwater, Report Supporting Alternative Demonstration Made Pursuant  
13 to Water Code Section 10733.6(b)(3), Prepared for the Ojai Basin Groundwater Management  
14 Agency. December 23, 2016, available at  
15 [http://obgma.com/wp-content/uploads/2016/12/OBGMA-Report-Supporting-Alternative-](http://obgma.com/wp-content/uploads/2016/12/OBGMA-Report-Supporting-Alternative-Demonstration-web.pdf)  
16 [Demonstration-web.pdf](http://obgma.com/wp-content/uploads/2016/12/OBGMA-Report-Supporting-Alternative-Demonstration-web.pdf)

17           14.     Kear Groundwater, Ventura River Basin: Surface and Groundwater Interaction.  
18 Presentation prepared for the Meiners Oaks Water District. April 17, 2012, available at  
19 <https://www.imanageshare.com/pd/4LS00bI51aq>

20           15.     Ojai Basin Groundwater Management Agency (OBGMA), Ojai Basin  
21 Groundwater Management Plan: 2018 Update. August 30, 2018, available at  
22 <http://obgma.com/wp-content/uploads/2018/09/OBGMA-GMP-2018-Update-Final-8-30-18s.pdf>

23           16.     Rincon Consultants, Inc. Aquatic Groundwater Dependent Ecosystem Assessment:  
24 Upper Ventura River Groundwater Basin. Prepared for Upper Ventura River Groundwater  
25 Agency. April 2021, available at  
26 [https://uvrgroundwater.org/wp-content/uploads/2021/04/Aquatic-GDE-Assessment\\_Draft.pdf](https://uvrgroundwater.org/wp-content/uploads/2021/04/Aquatic-GDE-Assessment_Draft.pdf)

27           17.     Rincon Consultants, Inc., Riparian Groundwater Dependent Ecosystem  
28 Assessment: Upper Ventura River Groundwater Basin. Prepared for Upper Ventura River

1 Groundwater Agency. April 2021, available at  
2 [https://uvrgroundwater.org/wp-content/uploads/2021/04/Riparian-GDE-Assessment\\_DRAFT.pdf](https://uvrgroundwater.org/wp-content/uploads/2021/04/Riparian-GDE-Assessment_DRAFT.pdf)

3 18. Tetra Tech, Baseline Model Calibration and Validation Report, Ventura River  
4 Watershed Hydrology Model. Prepared for Ventura County Watershed Protection District. July  
5 21, 2009, available at  
6 [http://friendsofventurariver.org/wp-content/themes/client-sites/venturariver/docs/ventura-river-](http://friendsofventurariver.org/wp-content/themes/client-sites/venturariver/docs/ventura-river-watershed-hydrology-calibration-validation.pdf)  
7 [watershed-hydrology-calibration-validation.pdf](http://friendsofventurariver.org/wp-content/themes/client-sites/venturariver/docs/ventura-river-watershed-hydrology-calibration-validation.pdf)

8 19. Upper Ventura River Groundwater Agency (UVRGA), Draft Upper Ventura River  
9 Groundwater Sustainability Plan, Sections 3.1, 3.2. July 2020, available at  
10 [https://uvrgroundwater.org/wp-content/uploads/2020/10/UVRGA-Preliminary-Draft-GSP-Basin-](https://uvrgroundwater.org/wp-content/uploads/2020/10/UVRGA-Preliminary-Draft-GSP-Basin-Setting_Text_070820.pdf)  
11 [Setting\\_Text\\_070820.pdf](https://uvrgroundwater.org/wp-content/uploads/2020/10/UVRGA-Preliminary-Draft-GSP-Basin-Setting_Text_070820.pdf)

12 20. UVRGA, GSP Workshop #3 Presentation. Presentation given on April 29, 2021  
13 via Zoom, available at [https://uvrgroundwater.org/wp-content/uploads/2021/04/20210302-](https://uvrgroundwater.org/wp-content/uploads/2021/04/20210302-UVRGA-Workshop-No-3_low_res.pdf)  
14 [UVRGA-Workshop-No-3\\_low\\_res.pdf](https://uvrgroundwater.org/wp-content/uploads/2021/04/20210302-UVRGA-Workshop-No-3_low_res.pdf)

15 21. California Regional Water Quality Control Board – Los Angeles Region, Ventura  
16 River Watershed Summary, available at  
17 [http://www.waterboards.ca.gov/rwqcb4/water\\_issues/programs/regional\\_program/Water\\_Quality](http://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/ventura_river_watershed/summary.shtml)  
18 [\\_and\\_Watersheds/ventura\\_river\\_watershed/summary.shtml](http://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/ventura_river_watershed/summary.shtml)

19 22. California Regional Water Quality Control Board – Los Angeles Region, State of  
20 the Watershed – Report on Surface Water Quality, the Ventura River Watershed. May 2002,  
21 available at  
22 [https://www.waterboards.ca.gov/rwqcb4/water\\_issues/programs/regional\\_program/Water\\_Qualit](https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/water_report/VenturaRiverState.shtml)  
23 [y\\_and\\_Watersheds/water\\_report/VenturaRiverState.shtml](https://www.waterboards.ca.gov/rwqcb4/water_issues/programs/regional_program/Water_Quality_and_Watersheds/water_report/VenturaRiverState.shtml)

24 23. California Department of Fish and Wildlife, Study Plan: Habitat and Instream  
25 Flow Evaluation for Steelhead in the Ventura River, Ventura County. January 2017, available at:  
26 [http://venturawatershed.us4.list-](http://venturawatershed.us4.list-manage2.com/track/click?u=23ecb819d89925323a8b96d15&id=68bd89e12a&e=b77285f3f6)  
27 [manage2.com/track/click?u=23ecb819d89925323a8b96d15&id=68bd89e12a&e=b77285f3f6,](http://venturawatershed.us4.list-manage2.com/track/click?u=23ecb819d89925323a8b96d15&id=68bd89e12a&e=b77285f3f6)  
28 quoting Los Angeles Regional Water Quality Control Board, Ventura River Watershed.

1           24.     Walter, L. Ventura River Watershed Management Plan,  
2 Prepared for the Ventura River Watershed Council. March 2015, available at  
3 <http://venturawatershed.org/the-watershed-plan>

4           25.     Watershed Coalition of Ventura County, Integrated Regional Water Management  
5 Plan (IRWMP), Appendix C, Ventura River Watershed IRWMP Section. Adopted in 2014,  
6 amended in 2019, available at  
7 <http://wcvc.ventura.org/IRWMP/2019IRWMP.htm>

8           26.     State Water Resources Board Bulletin No. 118 – California’s Groundwater –  
9 excerpt re Basin Description: Upper Ojai Valley Groundwater Basin No. 4-1. Updated February  
10 27, 2004, published March 3, 2020, available at  
11 [https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_001_UpperOjaiValley.pdf)  
12 [Management/Bulletin-118/Files/2003-Basin-Descriptions/4\\_001\\_UpperOjaiValley.pdf](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_001_UpperOjaiValley.pdf)

13           27.     State Water Resources Board Bulletin No. 118 – California’s Groundwater –  
14 excerpt re Basin Description: Ojai Valley Groundwater Basin No. 4-2. Updated February 27,  
15 2004, published March 3, 2020, available at  
16 [https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_002_OjaiValley.pdf)  
17 [Management/Bulletin-118/Files/2003-Basin-Descriptions/4\\_002\\_OjaiValley.pdf](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_002_OjaiValley.pdf)

18           28.     State Water Resources Board Bulletin No. 118 – California’s Groundwater –  
19 excerpt re Basin Description: Ventura River Valley Groundwater Basin, Upper Ventura River  
20 Subbasin No. 4-3.01. Updated February 27, 2004, published March 3, 2020, available at  
21 [https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_003_01_UpperVenturaRiverSubbasin.pdf)  
22 [Management/Bulletin-118/Files/2003-Basin-](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_003_01_UpperVenturaRiverSubbasin.pdf)

23 [Descriptions/4\\_003\\_01\\_UpperVenturaRiverSubbasin.pdf](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/4_003_01_UpperVenturaRiverSubbasin.pdf)

24           29.     State Water Resources Board Bulletin No. 118 – California’s Groundwater –  
25 excerpt re Basin Description: Ventura River Valley Groundwater Basin, Lower Ventura River  
26 Subbasin No. 4-3.02. Updated February 27, 2004, published March 3, 2020, available at

27           ///

28           ///

1 <https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater->  
2 [Management/Bulletin-118/Files/2003-Basin-](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-)  
3 [Descriptions/4\\_003\\_02\\_LowerVenturaRiverSubbasin.pdf](https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-)

4 30. State Water Resources Control Board Permit for Diversion and Use of Water,  
5 Permit 21303, San Antonio Creek. May 31, 2012, available at  
6 <https://www.imanageshare.com/pd/4LS00bI51aq>

7 31. Operations Agreement Regarding the San Antonio Creek Spreading Grounds  
8 Rehabilitation Project. January 12, 2015, available at  
9 [http://bosagenda.countyofventura.org/sirepub/view.aspx?cabinet=published\\_meetings&fileid=74](http://bosagenda.countyofventura.org/sirepub/view.aspx?cabinet=published_meetings&fileid=74)  
10 1400

11 32. Letter from National Oceanic and Atmospheric Administration's National Marine  
12 Fisheries Service to State Water Resources Control Board. August 4, 2011, with Attachments 1-  
13 2, available at <https://www.imanageshare.com/pd/4LS00bI51aq>

14 33. Letter from California Department of Fish and Game (Pert) to State Water  
15 Resources Control Board (Emanuel) re Application to Appropriate Water #31854 (Application)  
16 filed by Ventura County Watershed Protection District, Ventura County. August 15, 2011,  
17 available at <https://www.imanageshare.com/pd/4LS00bI51aq>

18 34. Letter from National Oceanic and Atmospheric Administration's National Marine  
19 Fisheries Service (McInnis) to SWRCB (Emanuel). August 23, 2011, available at  
20 <https://www.imanageshare.com/pd/4LS00bI51aq>

21  
22 Dated: June 25, 2021

BEST BEST & KRIEGER LLP

23  
24 By: 

25 SHAWN D. HAGERTY  
26 CHRISTOPHER M PISANO  
27 SARAH C. FOLEY  
28 PATRICK D. SKAHAN  
Attorneys for Respondent and Cross-  
Complainant  
CITY OF SAN BUENAVENTURA