



1 Meher Mount Corporation
9902 Sulphur Mountain Road
2 Ojai, CA 93023
(916) 837-3907
3 Robert.turnage@sbcglobal.net

4 Authorized Representative

5 SUPERIOR COURT OF THE STATE OF CALIFORNIA
6 COUNTY OF LOS ANGELES

8 SANTA BARBARA CHANNELKEEPER,

9 A California non-profit corporation,

10
11 Petitioner/Plaintiff,

12 v.

13 STATE WATER RESOURCES CONTROL

14 BOARD, a California State Agency,

15 CITY OF SAN BUENAVENTURA, a California

16 Municipal Corporation.

17 Respondent/Defendant

) Case No. 19STCPO1176

) Judge: Honorable William F. Highberger

) INITIAL DISCLOSURES OF MEHER MOUNT
) CORPORATION

) Date: June 1, 2021

) Time: 1:30 p.m.

) Action Filed: Sept. 19, 2014

) Trial Date: Not Set

18
19 CITY OF SAN BUENAVENTURA, a California

20 Municipal Corporation,

21 Cross-Complainant

22 v.

23 Duncan Abbott et al

24 Cross-Defendants

25
26 CITY OF SAN BUENAVENTURA, a California

27 Municipal Corporation,

28 Cross-Complainant

1 v.

2 MEHER MOUNT CORPORATION

3 Cross-Defendant

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5 **INITIAL DISCLOSURES OF MEHER MOUNT CORPORATION**

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7 These required Initial Disclosures, according to Code of Civil Procedure Section 842, are being served
8 on all parties in Case No. 19STCP01176, Comprehensive Adjudication:

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10 Meher Mount Corporation, Attn: Robert Turnage, 9902 Sulphur Mountain Road, Ojai CA 93023. (916)
11 837-3907

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13 Water Used from the Ventura River Watershed:

14 Meher Mount Corporation (Meher Mount) is a non-profit public benefit corporation organized under the
15 Non-Profit Public Benefit Corporation Law for charitable and educational purposes. The corporation
16 owns and operates Meher Mount, a universal spiritual center dedicated to the teachings of Avatar Meher
17 Baba. Meher Mount is open to public visitation Thursday through Sunday, noon to 5:00 p.m. The Meher
18 Mount property is 172.45 acres of land located at 9902 Sulphur Mountain Road, on the ridge of Sulphur
19 Mountain that divides the Ventura River and Santa Clara River watersheds. (Assessor's parcel number
20 035-0-080-765.) The property does not overly any of the four groundwater basins in the Ventura River
21 Watershed. Almost all the acreage is undeveloped oak woodland and grassland. There is no cultivation
22 of commercial agricultural products. There is one caretaker residence on the property. All of Meher
23 Mount's water comes from a single old, unmetered, well located on the portion of the property that is in
24 the Santa Clara River watershed. The beneficial uses to which the water has been placed are drinking
25 water, sanitation and irrigation of landscaping around the caretaker residence.

26 The water drawn from the existing well has extremely high sulphur content. Even with our onsite
27 treatment the water is non-potable. For drinking purposes Meher Mount relies on further treatment with
28 a small reverse osmosis unit as well as the purchase and transport of bottled water. A future water right

1 claim would include the drilling of a new well to extract groundwater underlying the Ventura River
2 watershed portion of the property, given the inevitable need to eventually replace the old existing well
3 and to do so with water of improved quality for drinking and sanitation purposes.
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8 Dated: June 1, 2021

9 Robert Turnage
10 Cross-Defendant Authorized Representative
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