



1 ROB BONTA  
 Attorney General of California  
 2 ERIC M. KATZ  
 Supervising Deputy Attorney General  
 3 NOAH GOLDEN-KRASNER (SBN 217556)  
 Deputy Attorney General  
 4 300 South Spring Street, Suite 1702  
 Los Angeles, CA 90013  
 5 Telephone: (213) 269-6343  
 Fax: (916) 731-2128  
 6 E-mail: Noah.GoldenKrasner@doj.ca.gov  
*Attorneys for Intervenor California*  
 7 *Department of Fish and Wildlife*

EXEMPT FROM FILING FEES  
 PER GOV. CODE § 6103

8  
 9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 10 COUNTY OF LOS ANGELES

11  
 12 **SANTA BARBARA CHANNELKEEPER,**  
 Petitioner,  
 13  
 v.  
 14  
 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

23  
 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  
22 300 South Spring St., Suite 1702  
23 Los Angeles, CA 90013  
24 (213) 269-6343  
25 E-mail: noah.goldenkrasner@doj.ca.gov  
26 E-mail: eric.katz@doj.ca.gov

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

32 ///

33 ///

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.

3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

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*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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

**PROOF OF SERVICE OF ELECTRONIC TRANSMISSION**  
**VIA FILE & SERVE EXPRESS**

Case Name: **Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.**

Case No.: **19STCP01176**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter; my business address is Office of the Attorney General, 300 S. Spring Street, Suite 1702, Los Angeles, CA 90013.

On May 28, 2021 I electronically served the document described below via File & Serve Xpress, on the recipients designated on the Transaction Receipt located on the File & Serve Xpress website:

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE'S  
INITIAL DISCLOSURES**

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on May 28, 2021, at Los Angeles, California.

Beatriz Davalos

Declarant



Signature