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Attorneys for Cross-Defendants
VENTURA RIVER WATER DISTRICT and
MEINERS OAKS WATER DISTRICT

FILED
LOS ANGELES SUPERIOR COURT

JAN 23 2020

Sherri R. Carter, Executive Officer/Clerk
By Tanya Herrera, Deputy
Tanya Herrera

Exempt from Filing Fees
Pursuant to Cal. Government
Code §6103

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER, a California non-profit corporation,

Petitioner,

vs.

STATE WATER RESOURCES CONTROL BOARD, a California State Agency; CITY OF SAN BUENAVENTURA, a California municipal corporation,

Respondents.

CITY OF SAN BUENAVENTURA, a California municipal corporation,

Cross-Complainant

vs.

CASITAS MUNICIPAL WATER DISTRICT, a California special district, et al.

Cross-Defendants.

Case No.: 19STCP01176

CROSS-DEFENDANTS MEINERS OAKS WATER DISTRICT'S INITIAL DISCLOSURE

Judge: William F. Highberger
Trial Date: Not Set
Action Filed: September 19, 2014

BY FAX

ORIGINAL
01/24/2020

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Pursuant to the Court's Order for Stay dated August 23, 2019, Cross-Defendant Meiners Oaks Water District ("**MOWD**") makes the following Initial Disclosures.

1. The name, address, telephone number, and email address of the party and the party's attorney:

Meiners Oaks Water District
Mike Hollebrands, General Manager
202 West El Roblar Drive
Ojai, CA 93023
805.646.2114
Mikeh2o@meinersoakswater.com

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2. The quantity of any groundwater extracted from the basin by the party and the method of measurement used by the party for each of the previous 10 years preceding the filing of the complaint.

MOWD extracts water from the Ventura River and/or the interconnected Upper Ventura River Groundwater Basin at four locations identified as Well Nos. 1, 2, 4 and 7. Extractions are measured by meters. MOWD has extracted the following quantities of water for each of the previous 10 years preceding the fling of the cross-complaint:

2009	1,111.83
2010	961.56
2011	837.56
2012*	939.31
2013*	836.64

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2014*	509.66
2015*	453.27
2016*	302.64
2017*	672.54
2018*	203.95

*Please note that these years do not include water purchased from Casitas Municipal Water District to supplement groundwater that MOWD was unable to pump from its wells in those years.

3. The type of water right or rights claimed by the party for the extraction of groundwater.

MOWD holds pre-1914 appropriative to surface water and subsurface underflow, and appropriative, prescriptive, and overlying rights - held in trust for a portion of its district - in percolating groundwater.

4. A general description of the purpose to which the groundwater has been put.

MOWD provides potable water service to a population of approximately 4,200, through 1,280 service connections.

5. The location of each well or other source through which groundwater has been extracted.

MOWD extracts water from four wells located as follows:

Well No. 1: Ventura County Assessor Parcel Number 010-0-050-220

Well No. 2: Ventura County Assessor Parcel Number 010-0-050-230

Well No. 4: Ventura County Assessor Parcel Number 010-0-030-06

Well No. 7: Ventura County Assessor Parcel Number 010-0-030-03

6. The area in which the groundwater has been used.

Water pumped from the wells identified above is used within the boundaries of the MOWD

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shown on the map attached as **EXHIBIT A**.

7. Any claims for increased or future use of groundwater.

MOWD customers have been subject to pumping reductions due to the drought and other constraints, and the district has realized conservation rates of up to 40%. MOWD's pre-1914 appropriative rights entitles it to 263.75 miner's inches (approximately 4,770 acre feet) annually. MOWD claims the right to future use of water pursuant to California Water Code Sections 106.5, 1203, and 1460 through 1464.

8. The quantity of any beneficial use of any alternative water use that the party claims as its use of groundwater under any applicable law, including, but not limited to, Section 1005.1, 1005.2, or 1005.4 of the Water Code.

None at this time.

9. Identification of all surface water rights and contracts that the party claims provides the basis for its water right claims in the comprehensive adjudication.

MOWD holds the following grant deeds from which it received title to the pre-1914 rights described therein, and documented by water notices recorded as early as 1887:

- Grant Deed dated April 5, 1950 from Rancho Ojai Mutual Water Company to Meiners Oaks County Water District recorded February 23, 1951 at Book 983, Page 245 of Official Records.
- Grant Deed dated May 13, 1985 from Ranchitos Mutual Water Company to Meiners Oaks County Water District recorded June 19, 1985 at Ventura County Official Records as document No. 064240.
- Grant Deed dated May 13, 1985 from Ranchitos Mutual Water Company to Meiners Oaks County Water District recorded June 19, 1985 at Ventura County Official Records as document No. 064241.

MOWD also holds a contractual water right with Casitas Municipal Water District.

10. The quantity of any replenishment of water to the basin that augmented the basin's native water supply.

01/24/2020

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None at this time.

11. The names, addresses, telephone numbers, and email addresses of all persons possessing information that supports the party's disclosures.

Meiners Oaks Water District
Mike Hollenbrands, General Manager
202 West El Roblar Drive
Ojai, CA 93023
805.646.2114
Mikeh2o@meinersoakswater.com

12. Any other facts that tend to prove the party's claimed water right.

None at this time. MOWD will supplement such facts pursuant to California Code of Civil Procedure section 842(d).

MOWD's initial disclosures are based upon information currently reasonably available, and will be updated with new information.

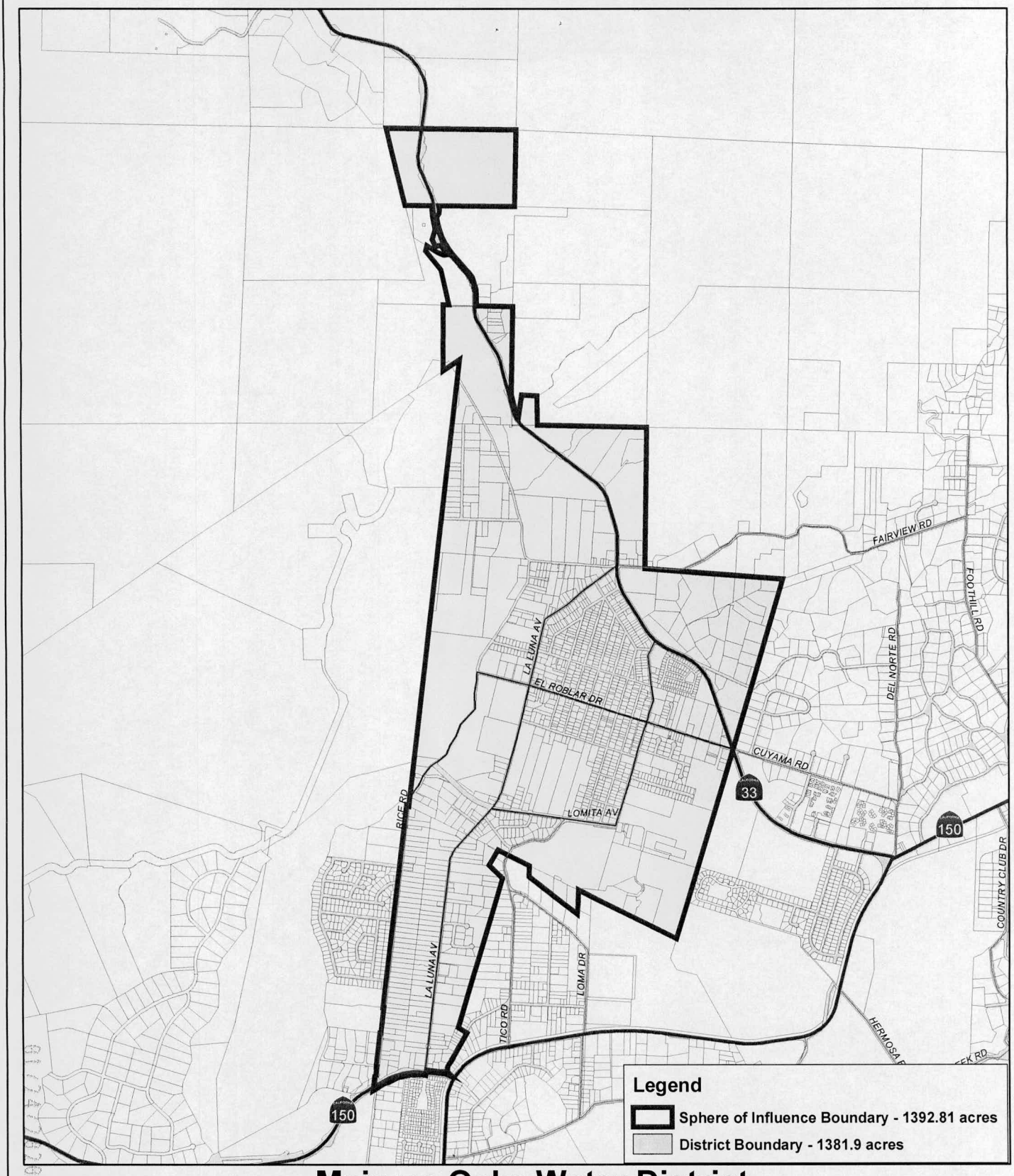
DATED: November 18, 2019

HERUM CRABTREE SUNTAG
A California Professional Corporation

By: _____
JEANNE M. ZOLEZZI
Attorneys for Cross-Defendants

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EXHIBIT "A"



Meiners Oaks Water District

Sphere of Influence

As Reviewed by the Ventura LAFCO - January 21, 2009

Prepared by County of Ventura - Information Systems Department - GIS Division

State Plane Coordinate System California Zone V - NAD 27

This map was compiled from records and computations

N W E S

0 1,250 2,500 5,000 Feet

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Santa Barbara Channelkeeper v. State Water Resources Control Board, et al.
Los Angeles County Superior Court – Case No. Case No 19STCP01176

PROOF OF SERVICE

I, PEGGY GARCIA, certify and declare as follows:

I am over the age of 18 years and not a party to this action. My business address is: HERUM\CRABTREE\SUNTAG, 5757 Pacific Avenue, Suite 222, Stockton, California 95207. On the date set forth below, I served the following document(s):

CROSS-DEFENDANTS MEINERS OAKS WATER DISTRICT'S INITIAL DISCLOSURE

[X] **BY ELECTRONIC TRANSMISSION**. On the date set forth below, I submitted the document(s) on a Los Angeles County Superior Court Approved E-Filing Service Provider to be served electronic transmission to the e-mail address(es) provided through File & ServeXpress.

[ ] **BY U.S. MAIL** – By enclosing the document(s) in a sealed envelope addressed to the person(s) set forth below, and placing the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing of correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.

The envelope was addressed as follows:

[ ] **BY FEDERAL EXPRESS/OVERNIGHT MAIL** in a sealed envelope, with postage thereon fully prepaid. [Code Civ. Proc., §§ 1013(c), 2015.5.]

The envelope was addressed as follows:

[ ] **BY PERSONAL SERVICE/HAND DELIVERY**.

[ ] **BY FACSIMILE.** By use of facsimile machine telephone number (209) 472-7986, I caused the facsimile machine to print a transmission record of the transmission, a copy of which is attached to this declaration. The transmission was reported as complete and without error. [Cal. Rule of Court 2.301 and 2.306.]

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: January 23, 2020

Peggy Garcia
PEGGY GARCIA

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