



1 ROB BONTA  
 Attorney General of California  
 2 MYUNG J. PARK  
 Supervising Deputy Attorney General  
 3 MATTHEW G. BULLOCK (SBN 243377)  
 MARC N. MELNICK (SBN 168187)  
 4 Deputy Attorneys General  
 1515 Clay Street, 20th Floor  
 5 P.O. Box 70550  
 Oakland, CA 94612-0550  
 6 Telephone: (510) 879-0750  
 Fax: (510) 622-2270  
 7 E-mail: Marc.Melnick@doj.ca.gov  
*Attorneys for Respondent and Intervenor State*  
 8 *Water Resources Control Board*

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

12 **SANTA BARBARA CHANNELKEEPER,**  
 13  
 Petitioner,  
 14  
 v.  
 15  
 16 **STATE WATER RESOURCES CONTROL**  
**BOARD, a California State Agency; CITY**  
 17 **OF BUENAVENTURA, a California**  
**municipal corporation,**  
 18  
 Respondents.

Case No. 19STCP01176  
**SWRCB'S INITIAL DISCLOSURES**  
 Dept.: 10  
 Judge: Honorable W. Highberger  
 Trial Date: None Set  
 Action Filed: September 19, 2014

20 **CITY OF SAN BUENAVENTURA,**  
**California municipal corporation,**  
 21  
 Cross-Complainant,  
 22  
 v.  
 23  
 24 **DUNCAN ABBOTT, an individual; et al.,**  
 Cross-Defendants.  
 25

26  
 27  
 28

1 TO ALL PARTIES HEREIN AND TO THEIR RESPECTIVE ATTORNEYS OF  
2 RECORD:

3 Respondent and intervenor State Water Resources Control Board (the "State Water Board")  
4 hereby submits the following initial disclosures pursuant to California Code of Civil Procedure  
5 section 842. The State Water Board makes these disclosures after reasonable investigation and  
6 based on information reasonably available to it at the time of these disclosures. The State Water  
7 Board reserves the right to supplement these disclosures as discovery and investigation continue.  
8 By these disclosures, the State Water Board in no way waives its rights to rely on documents or  
9 other information which have not been included in these initial disclosures due to good faith  
10 oversight, mistake, inadvertence, or other justifiable reasons.

11 By providing the information set forth herein, the State Water Board does not waive any  
12 privileges or protections that may be related to any information or documents discussed herein,  
13 including, but not limited to, the attorney-client privilege, attorney work-product doctrine, and the  
14 right of privacy, all of which are expressly claimed and reserved.

15 The State Water Board provides the following information:

16 The State Water Board's name and address are:

17 State Water Resources Control Board  
18 1001 I Street  
19 P.O. Box 100  
Sacramento, CA 95812-0100

20 The State Water Board should be contacted through counsel.

21 The State Water Board's counsel is:

22 Marc N. Melnick  
23 Matthew Bullock  
24 Deputy Attorneys General  
25 California Attorney General's Office  
26 1515 Clay Street, 20th Floor  
27 P.O. Box 70550  
Oakland, CA 94612-0550  
(510) 879-0750  
[marc.melnick@doj.ca.gov](mailto:marc.melnick@doj.ca.gov)  
[matthew.bullock@doj.ca.gov](mailto:matthew.bullock@doj.ca.gov)

1 The State Water Board has not extracted any groundwater or diverted any surface water in  
2 the previous ten years in the Ventura River watershed, and does not claim any water rights in the  
3 Ventura River watershed. The State Water Board is the state agency responsible for “the orderly  
4 and efficient administration of the water resources of the state,” and is empowered with  
5 adjudicatory and regulatory functions to carry out this mandate. (Wat. Code, § 174.) The State  
6 Water Board has a unique interest in ensuring that any determinations by the Court and any  
7 settlement are fair, equitable, legally correct, and in the public interest. Therefore, there is no  
8 need for a response from the State Water Board on the items described in subsections (a)(2)  
9 through (a)(12) of Code of Civil Procedure section 842.

10 Dated: June 1, 2021

Respectfully Submitted,

11 ROB BONTA  
12 Attorney General of California  
13 MYUNG J. PARK  
14 Supervising Deputy Attorney General



15 MARC N. MELNICK  
16 Deputy Attorney General  
17 *Attorneys for Respondent and Intervenor*  
18 *State Water Resources Control Board*



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 am a Senior Environmental Scientist with the State Water Resources Control Board, and I am authorized to make this verification on its behalf. I have read the foregoing SWRCB'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.

Dated: June 1, 2021

  
Daniel Worth

SF2014902766  
SB ChKeeper SWRCB initial disclosures 5-24-21.docx