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

16 SANTA BARBARA CHANNELKEEPER, a  
17 California non-profit corporation,

18 Petitioner,

19 v.

20 STATE WATER RESOURCES CONTROL  
BOARD, et al,

21 Respondents.

22 CITY OF SAN BUENAVENTURA, et al.,

23 Cross-Complainant,

24 v.

25 DUNCAN ABBOTT, an individual, et al.,

26 Cross-Defendants.  
27

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**ORIGINAL FILED**  
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County of Los Angeles

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Sherri B. Carter, Executive Office/Clerk  
By: *Maisha Fryer*, Deputy  
Maisha Fryer

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**DECLARATION OF SUSAN RUNGREN**

I, Susan Rungren, declare as follows:

1. I am the General Manager for Ventura Water, which is the Department of the City of San Buenaventura (“City”) that is responsible for providing water and wastewater services to the residents of the City. I have personal knowledge of all matters stated in this declaration, and I could and would testify competently thereto if called upon to do so.

2. I have worked for the City since 1999. I began my career with the City as a Utilities Engineer for the Water and Wastewater Divisions, and I was a Water Resource Manager for seven years. I have been the General Manager for Ventura Water for approximately two years. In January 2019, I became the interim General Manager, and in May 2019, I was appointed as the General Manager. From May 2018 to January 2019, I was the Assistant General Manager for Ventura Water.

3. The City obtains about 19% of its water supply from the Ventura River. The City operates groundwater wells and a subsurface diversion at its Foster Park well facility, which is located on the Ventura River approximately three to four miles northeast from the estuary where the river meets the Pacific Ocean. The City has extracted water from the Ventura River at Foster Park well facility since I have worked at the City.

4. During the winter of 2005, there were large storms that caused flooding within the Ventura River watershed, which damaged the City’s Foster Park well facility. Following that incident, in connection with the City’s attempt to repair the damages to the well facility, the City initiated studies of the hydrology in the Ventura River Watershed in order to determine how to maintain its production with minimal impacts to river flows. This has included studies of the interconnectivity of the Ventura River and its tributaries with the four groundwater basins beneath the watershed.

5. In 2014, Santa Barbara Channelkeeper (“Channelkeeper”) filed this lawsuit, and thereafter the City retained an expert consulting firm, Cardno Consultants. On behalf of the City, Cardno has now spent several years monitoring, investigating, and researching the hydrology of

1 the Ventura River Watershed, and the interconnectivity of the groundwater basins to the Ventura  
2 River and its tributaries. This effort on the part of Cardno, which I have been involved in through  
3 legal counsel, has been exhaustive, and has been conducted at great expense to the City.

4 6. I am also aware that other parties to this action have studied hydrology issues  
5 associated with the Ventura River Watershed and the groundwater basins over the years in  
6 connection with other projects within the Watershed. For example, I am aware that the State  
7 Water Resources Control Board (“SWRCB”), which is also a defendant and intervenor in this  
8 action, has also been studying the hydrology and interconnection of the Ventura River Watershed  
9 and the groundwater basins in the area for several years. In 2016, SWRCB informed the City that  
10 it would be studying the hydrology of the Ventura River Watershed, and I am aware that in 2017,  
11 SWRCB issued a Request for Qualifications for a consultant to perform monitoring and modeling  
12 of the Ventura River Watershed and the groundwater basins in the area. I understand that this  
13 monitoring and modeling work is ongoing.

14 7. I am also aware that Ventura County Watershed Protection District (“VCWPD”)  
15 has studied hydrology issues in connection with a recharge project it participated in with Casitas  
16 Municipal Water District (“Casitas”) and the Ojai Basin Groundwater Management Agency. I  
17 am aware that in 2007, SWRCB awarded VCWPD \$25 million in Proposition 50 funds in order  
18 to implement projects identified in the Ventura County Integrated Regional Water Management  
19 Plan. One of the projects that was funded was a recharge project, where water was diverted from  
20 San Antonio Creek, which is a tributary of the Ventura River, into nearby percolation ponds in  
21 order to recharge the Ojai Valley Groundwater Basin. In January 2015, the City and VCWPD  
22 entered into an operations agreement regarding this project, and in order to preserve the City’s  
23 senior downstream water rights, the parties agreed that VCWPD’s project would only divert  
24 water from San Antonio Creek at certain times of the year and only when flows in the creek were  
25 at certain levels. I am aware that as part of this project, VCWPD and the Ojai Basin Groundwater  
26 Management Agency (“OBGMA”) studied the hydrology of the Ventura River Watershed and the  
27 Ojai Valley Groundwater Basin.

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