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Attorneys for Cross-Defendant Ventura
County Watershed Protection District

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SANTA BARBARA CHANNELKEEPER, a
California non-profit corporation,

Petitioner,

v.

STATE WATER RESOURCES CONTROL
BOARD, a California State Agency, et al.,

Respondents.

Case No. 19STCP01176

Hon. William. F. Highberger

**CROSS-DEFENDANT VENTURA
COUNTY WATERSHED PROTECTION
DISTRICT'S INITIAL DISCLOSURES**

(CIVIL PROCEDURE CODE § 842)

Action Filed:

September 19, 2014

Trial Date:

Not Set

CITY OF SAN BUENAVENTURA, a
California municipal corporation,

Cross-Complainant,

v.

DUNCAN ABBOTT, an individual, et al.,

Cross-Defendants.

1 Cross-Defendant Ventura County Watershed Protection District ("Watershed
2 Protection District") hereby submits the following initial disclosures under section 842 of
3 the Code of Civil Procedure.

4 **A. PARTY INFORMATION**

- 5 • Ventura County Watershed Protection District
6 800 South Victoria Avenue
7 Ventura, California 93009
pwaweb@ventura.org

8 The Watershed Protection District is represented in this lawsuit by counsel:

- 9 • Hanson Bridgett, LLP
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11 Nathan A. Metcalf
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15 **B. CLAIMS TO GROUNDWATER**

16 **1. Type of Groundwater Claimed**

17 The Watershed Protection District has surface water rights under State Water
18 Resources Control Board ("State Board") Permit 21303 to divert 25 cubic feet per
19 second from San Antonio Creek and associated groundwater storage of 914 acre-feet
20 per annum.

21 **2. Quantity of Groundwater Extracted**

22 The Watershed Protection District does not currently extract groundwater from the
23 basin. The Watershed Protection District reserves the right to reclaim and extract
24 groundwater from the San Antonio Creek Spreading Grounds Rehabilitation Project once
25 that project is fully permitted and functional.

26 **3. Purpose to Which Groundwater Has Been Put**

27 The Watershed Protection District does not currently extract groundwater from the
28 basin. The Watershed Protection District reserves the right to reclaim and extract

1 groundwater from the San Antonio Creek Spreading Grounds Rehabilitation Project once
2 that project is fully permitted and functional.

3 **4. Location of Groundwater Extracted**

4 The Watershed Protection District does not currently extract groundwater from the
5 basin.

6 **5. Area in Which Groundwater Has Been Used**

7 The Watershed Protection District does not currently extract groundwater from the
8 basin.

9 **6. Increased or Future Uses of Groundwater**

10 The Watershed Protection District reserves the right to reclaim and extract
11 groundwater from the San Antonio Creek Spreading Grounds Rehabilitation Project once
12 that project is fully permitted and functional. Once it begins operating under State Board
13 Permit 21303, the Watershed Protection District intends to operate the Project to capture
14 up to 25 cubic feet per second of surface flow when available from San Antonio Creek.
15 This water will recharge the Ojai Valley Groundwater Basin and help augment the Ojai
16 Valley's water supply.

17 **7. Quantity of Alternative Water Uses**

18 The Watershed Protection District does not currently extract groundwater from the
19 basin and has not begun replenishment activities under the San Antonio Creek
20 Spreading Grounds Rehabilitation Project. The Watershed Protection District reserves
21 the right to reclaim and extract groundwater from the San Antonio Creek Spreading
22 Grounds Rehabilitation Project once fully permitted and functional.

23 **8. Surface Water Rights and Contracts Providing the Basis for Water**
24 **Right Claims**

25 The Watershed Protection District has surface water rights under State Board
26 Permit 21303 on San Antonio Creek and associated groundwater storage of 914 acre-
27 feet per annum.

28 The Watershed Protection District has a contractual right with Casitas Municipal

1 Water District ("Casitas") for the future assignment of Casitas' State Board License
2 10133.

3 **9. Quantity of Augmented Groundwater Supply**

4 The Watershed Protection District reserves the right to reclaim and extract
5 groundwater from the San Antonio Creek Spreading Grounds Rehabilitation Project once
6 that project is fully permitted and functional. Once the Project begins operating under
7 State Board permit 21303, the Watershed Protection District intends to operate the
8 Project to capture up to 25 cubic feet per second of surface flow when available from San
9 Antonio Creek. This will recharge the Basin and help augment the Ojai Valley's water
10 supply.

11 **C. PERSONS POSSESSING INFORMATION**

12 The following persons possess or may possess information supporting the
13 Watershed Protection District's disclosures:


- 14 1. Glenn Shephard
15 Watershed Protection Director, County of Ventura, Public Works Agency
16 800 S Victoria Ave, Ventura, CA 93009
(805) 654-2040
May be contacted through counsel
- 17 2. Peter Sheydayi
18 Watershed Protection Deputy Director, County of Ventura, Public Works
19 Agency
20 800 S Victoria Ave, Ventura, CA 93009
(805) 654-2016
May be contacted through counsel

21 **D. OTHER INFORMATION**

22 The Watershed Protection District tenders no additional facts at this time. It
23 reserves the right to supplement this disclosure. (Code Civ. Proc. § 842(d)(1).)
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1 DATED: October 22, 2019

HANSON BRIDGETT LLP



By: _____

MICHAEL J. VAN ZANDT

NATHAN A. METCALF

SEAN G. HERMAN

Attorneys for Cross-Defendant Ventura
County Watershed Protection District

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3 **VERIFICATION**

4 I, Glenn Shephard, am the Watershed Protection Director of the Ventura County
5 Watershed Protection District ("Watershed Protection District"). I am authorized to make
6 this verification on behalf of the Watershed Protection District. I have read the Watershed
7 Protection District's Section 842 Initial Disclosures and know its contents. I am informed
8 and believe and on that ground allege that the matters stated in the Section 842 Initial
9 Disclosures are true, except as to those matters which are therein stated on information
and belief, and as to those matters that I believe them to be true.

10 I declare under penalty of perjury under the laws of the State of California that the
11 foregoing is true and correct. Executed this 22nd day of October, 2019, in
12 Ventura, California.

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14 
15 Glenn Shephard
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1 **PROOF OF SERVICE**

2 **Santa Barbara Channelkeeper v. State Water Resources Control Board, et al**
3 **Case No. 19STCP01176**

4 **STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

5 At the time of service, I was over 18 years of age and not a party to this action. I
6 am employed in the County of San Francisco, State of California. My business address
7 is 425 Market Street, 26th Floor, San Francisco, CA 94105.

8 On October 22, 2019, I served true copies of the following document(s) described
9 as **CROSS-DEFENDANT VENTURA COUNTY WATERSHED PROTECTION**
10 **DISTRICT'S INITIAL DISCLOSURES** on the interested parties in this action as follows:

11 **SEE ATTACHED SERVICE LIST**

12 **BY ELECTRONIC SERVICE:** I electronically served the document(s) described
13 above via File & ServeXpress, on the recipients designated on the Transaction Receipt
14 located on the File & ServeXpress website (<https://secure.fileandservexpress.com>)
15 pursuant to the Court Order establishing the case website and authorizing service of
16 documents.

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

19 Executed on October 22, 2019, at San Francisco, California.

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Maria R. Flores

SERVICE LIST
Santa Barbara Channelkeeper v. State Water Resources Control Board, et al
Case No. 19STCP01176

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