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County Watershed Protection District

8  
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **COUNTY OF LOS ANGELES**

11 SANTA BARBARA CHANNELKEEPER, a  
California non-profit corporation,

12 Petitioner,

13 v.

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

16 Respondents.

17  
18 CITY OF SAN BUENAVENTURA, a  
California municipal corporation,

19 Cross-Complainant,

20 v.

21 DUNCAN ABBOTT, an individual, et al.,

22 Cross-Defendants.  
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Case No. 19STCP01176

Hon. William. F. Highberger

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

**(CIVIL PROCEDURE CODE § 842)**

Action Filed:  
Trial Date:

September 19, 2014  
Not Set

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  
10 Michael J. Van Zandt  
11 Nathan A. Metcalf  
12 Sean G. Herman  
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14 San Francisco, California 94105  
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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:

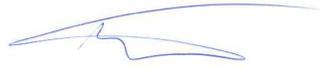
- 14 1. Glenn Shephard  
15 Watershed Protection Director, County of Ventura, Public Works Agency  
16 800 S Victoria Ave, Ventura, CA 93009  
17 (805) 654-2040  
18 May be contacted through counsel
- 19 2. Peter Sheydayi  
20 Watershed Protection Deputy Director, County of Ventura, Public Works  
21 Agency  
22 800 S Victoria Ave, Ventura, CA 93009  
23 (805) 654-2016  
24 May be contacted through counsel

25 **D. OTHER INFORMATION**

26 The Watershed Protection District tenders no additional facts at this time. It  
27 reserves the right to supplement this disclosure. (Code Civ. Proc. § 842(d)(1).)  
28

1 DATED: October 22, 2019

HANSON BRIDGETT LLP



By:

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MICHAEL J. VAN ZANDT  
NATHAN A. METCALF  
SEAN G. HERMAN  
Attorneys for Cross-Defendant Ventura  
County Watershed Protection District

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1 VERIFICATION

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

13  
14   
15 Glenn Shephard