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UNITED WATER CONSERVATION DISTRICT  
 "Conserving Water Since 1927"

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June 24, 2009

Mr. Aaron O. Allen  
 U.S. Army Corps of Engineers  
 2151 Alessandro Drive, Suite 110  
 Ventura California 93001

Subject: Comments on Newhall Ranch Draft EIS/EIR – SCH No. 2000011025

Dear Mr. Allen:

The purpose of this letter is to provide comments by United Water Conservation District on the Draft EIR/EIS for the Newhall Ranch Project. Our comments are limited to water resource issues, discussed in Section 4.3 of the EIS/EIR. We are pleased that the EIS/EIR mentions the MOU between United Water and upstream purveyors, and states that the applicant shall cooperate in good faith to implement the MOU requirements.

Nevertheless, we would like to clarify some wording in the first paragraph of page 4.3-123, under mitigation measure SP-4.11-19. Please note that the *Memorandum of Understanding Between the Santa Clara River Valley Upper Basin Water Purveyors and United Water Conservation District* has already been executed, effective August 20, 2001. Contrary to the implication of the EIS/EIR, it is our understanding that the upper basin water purveyors are doing monitoring and have prepared annual reports on that monitoring. See, for example the *2008 Santa Clarita Valley Water Report* by Luhdorff & Scalmanini, dated April 2009. In the final EIR/EIS, please briefly summarize the reporting that has been done.

Sincerely,

James M. Kentosh, P.E.  
 Manager of Resource Planning

JK: United/regulate/Corps/L-Newhall 6-09.doc  
 File: Newhall Land and Farming  
 Efile: Corr/Corps/Comments on Newhall EIS/EIR

**026. Letter from United Water Conservation District, dated June 24, 2009**

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**Response 1**

The Corps and CDFG appreciate the comment provided in your letter. Your comment regarding the Memorandum of Understanding (MOU) between United Water Conservation District (UWCD) and upstream purveyors will be included as part of the record and made available to decision makers prior to a final decision on the proposed Project. Because the comment does not address the content and analysis of the Draft EIS/EIR, no additional response is provided.

**Response 2**

It is acknowledged that the MOU between UWCD and the upstream purveyors already has been executed. The Draft EIS/EIR contains a description of the MOU and confirms its status. Specifically, on page 4.3-12, the Draft EIS/EIR states:

*"In 2001, prior to adoption of the GWMP, a local Memorandum of Understanding (MOU) process among CLWA, the purveyors, and United Water Conservation District (UWCD) in neighboring Ventura County had produced the beginning of local groundwater management, now embodied in the GWMP. The MOU is a collaborative and integrated approach to several of the aspects of water resource management included in the GWMP. UWCD manages surface water and groundwater resources in seven groundwater basins, all located in Ventura County, downstream of the Basin. As a result of the MOU, the cooperating agencies have undertaken the following measures: (1) integrated their database management efforts; (2) developed and utilized a numerical groundwater flow model for analysis of groundwater basin yield and containment of groundwater contamination; and (3) continued to monitor and report on the status of Basin conditions, as well as on geologic and hydrologic aspects of the overall stream-aquifer system."* (Italics added.)

**Response 3**

Beginning in 1998, and thereafter on an annual basis, the upstream water purveyors have prepared the Santa Clarita Valley Water Report. The 2006 and 2007 versions of the report were used to assist with preparation of the Draft EIS/EIR, **Section 4.3**, Water Resources. The 2008 Santa Clarita Valley Water Report was completed after circulation of the Draft EIS/EIR and is provided in **Appendix F4.3** of the Final EIS/EIR. The annual report provides current information about the water requirements and water supplies of the Santa Clarita Valley. The report was prepared for the imported water wholesaler, Castaic Lake Water Agency (CLWA), and for the four local retail water purveyors that serve the Valley: CLWA Santa Clarita Water Division, Los Angeles County Waterworks District 36, Newhall County Water District, and Valencia Water Company.