



UPPER LOS ANGELES RIVER AREA WATERMASTER
Richard C. Slade - Watermaster

ularawatermaster.com

14051 Burbank Blvd, STE 300
Sherman Oaks, CA 91401

818-506-0418 PHONE
818-506-1343 FAX

July 30, 2020

To: Burbank to Los Angeles Draft EIR/EIS Comment
355 S Grand Avenue, Suite 2050
Los Angeles, CA 90071
Sent via email (Burbank_Los.Angeles@hsr.ca.gov)

From: Richard Slade, Watermaster
Upper Los Angeles River Area (ULARA)
www.ULARAwatermaster.com

Cc: ULARA Administrative Committee
Sent via email

Re: ULARA Watermaster Comments
Draft Environmental Impact Report/Environmental Impact Statement
Burbank To Los Angeles Project Section
California High-Speed Rail Authority
(https://hsr.ca.gov/programs/environmental/eis_eir/draft_burbank_los_angeles.aspx?)

As the Court-appointed Watermaster for the Upper Los Angeles River Area (ULARA), my office has reviewed the Draft Environmental Impact Report/Environmental Impact Statement (DEIR) for the California High-Speed Rail (HSR): Burbank to Los Angeles Project Section. Descriptions of the project in the DEIR state that temporary, or possibly permanent, dewatering activities will occur within the alignment of the HSR that lies within the boundaries of ULARA, as part of the construction of the rail line. Specifically, the local part of that alignment is located within the adjudicated ULARA Watershed, and the valley fill sediments of the San Fernando Groundwater Basin. Because of this adjudication, all extractions of groundwater from anywhere within the ULARA boundaries must be reported to the ULARA Watermaster. Extraction of groundwater from ULARA may impact the water rights of the right's holders as set forth in *The City of Los Angeles v. City of San Fernando, Los Angeles Superior Court Case No. 650079, dated January 26, 1979* (ULARA Judgment)¹.

Whereas the DEIR does mention the adjudication on Page 3.8-29, the document does not appear to describe the necessary reporting of groundwater extractions from ULARA to the Watermaster. Throughout the DEIR document, where temporary or permanent extraction of groundwater is

¹ The ULARA Judgment is available online via the ULARA Watermaster website:
http://ularawatermaster.com/public_resources/City-of-LA-vs-City-of-San-Fernando-et-al-JUDGMENT.pdf



discussed, additional language should be included so that all groundwater extractions from ULARA are reported to the ULARA Watermaster, and to the City of Los Angeles (via the Los Angeles Department of Water and Power); the City of Los Angeles holds prior and paramount pueblo water rights to native groundwater in the San Fernando Groundwater Basin.

Additional specific comments are as follows:

- Section 3.8.2 (page 3.8-2) of the DEIR does not include the ULARA Judgment in the list of “federal, state, and local laws, regulations, orders, and plans that are relevant to hydrology and water resources” of the project. Reference to the ULARA Judgment should be included in this section.
- Table 3.8-5 (page 3.8-29) the tables lists “Typical Well Depths” ranging from 1,220 to 3,240 ft. There are no groundwater production wells in ULARA that extend to depths of 3,240 ft. Typical water well depths are on the order of 800 to 1,000 ft below ground surface.
- Section 3.8.6.3 (page 3.8-49) states “*Because there is not an adopted GSP applicable to the groundwater basins within the project alignment, construction activities would not result in permanent impacts related to conflict with or obstruction of the implementation of a sustainable groundwater management plan.*” This statement is repeated elsewhere in the document. This statement (and similar statements) should be edited to accurately reflect the Court-adjudicated status of ULARA. While there is no “sustainable groundwater management plan” for ULARA, groundwater within ULARA is adjudicated, and groundwater is managed in accordance with the ULARA Judgment. The ULARA Judgment requires safe yield operations for the ULARA groundwater basins to help ensure groundwater extractions over the long-term do not create a condition of overdraft. Basin management in ULARA is achieved by collective efforts between the Court-appointed ULARA Watermaster and an Administrative Committee consisting of representatives from the Parties to the ULARA Judgment.
- Appendix 3.1-B: Regional and Local Policy Consistency Analysis - This section does not discuss the ULARA Watermaster, or the necessity of reporting groundwater extractions to the ULARA Watermaster. Such information should be included in this Appendix.



We thank you for the opportunity to provide comments on this California High-Speed Rail Authority project. Should you have any questions, please do not hesitate to contact my office (www.ULARAwatermaster.com).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard C. Slade". The signature is fluid and cursive, with a long horizontal stroke at the end.

Richard C. Slade, ULARA Watermaster