

**DEPARTMENT OF WATER RESOURCES**

1416 NINTH STREET, P.O. BOX 942836  
SACRAMENTO, CA 94236-0001  
(916) 653-5791



January 25, 2019

Ms. Heather Dyer  
Water Resources Project Manager  
San Bernardino Valley Municipal Water District  
380 East Vanderbilt Way  
San Bernardino, California 92408

SCH# 2018121017 Upper Santa Ana River Habitat Conservation Plan

Dear Ms. Dyer:

The California Department of Water Resources (DWR) is a state agency which operates and maintains the California State Water Project (SWP). The SWP delivers water throughout the state of California to local water agencies and has water delivery facilities within the Upper Santa Ana River Habitat Conservation Plan (HCP) area. At times DWR activities are joint operations with HCP participating agencies. DWR appreciates the opportunity to provide the following comments.

- Considering the purpose of the HCP is to balance the effects of water supply management activities in the plan area with the conservation needs of special status plants and wildlife and their habitat, the EIR needs to explain how DWR's individual and cooperating activities will impact the environment.
- When analyzing the land use impacts, all current and continuing land uses and specifically the HCP's impacts to DWR activities need to be included in the analysis.
- Covered activities under the HCP include infrastructure for water supply reliability. As mentioned, DWR operates and maintains such infrastructure in the plan area. DWR would like incidental take coverage through the HCP, whether it be as a partner agency, through a certificate of inclusion program, as a mitigation only participant or other mechanism for participation. Since the HCP is a watershed approach, the plan and the EIR need to analyze a process or option to add new members or new participants.
- DWR requests that the scope of mitigation includes DWR activities.
- The analysis under cumulative impacts of the past, present, and reasonably foreseeable actions need to be considered in conjunction with the plan. This analysis must include DWR's water supply management activities.

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January 28, 2018  
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If you have any questions regarding these comments, you may contact me at  
(916) 653-6840 or [Nancy.Finch@water.ca.gov](mailto:Nancy.Finch@water.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Nancy Finch". The signature is written in a cursive style with a large initial "N" and a stylized "F".

Nancy Finch  
Senior Staff Attorney

cc State Clearinghouse