

January 24, 2019

VIA FIRST CLASS MAIL AND EMAIL (comments@sbvmwd.com)

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

RE: Notice of Preparation Regarding Upper Santa Ana River Habitat
Conservation Plan

Dear Ms. Dyer:

This letter provides the comments of Southern California Edison (SCE) regarding the Notice of Preparation dated December 7, 2018 for the Upper Santa Ana River Habitat Conservation Plan and related Environmental Impact Report (collectively, HCP). We understand that the U.S. Fish & Wildlife Service (USFWS) will be the lead federal agency regarding the HCP and will prepare a federal Environmental Impact Statement (EIS). We look forward to an opportunity to review and comment on the Notice of Intent regarding the EIS.

SCE operates hydroelectric generating facilities on the Upper Santa Ana River and three of its tributaries (Lytle Creek, Alder Creek, and Mill Creek). SCE operates the facilities pursuant to licenses issued by the Federal Energy Regulatory Commission (FERC) and permits issued by the U.S. Army Corps of Engineers through the FERC licenses. SCE representatives have participated in several meetings with representatives of the San Bernardino Valley Municipal Water District (SBVMWD), USFWS, and other parties interested in the HCP. SCE has described in considerable detail the issues that SCE believes will need to be addressed in the HCP and related EIR/EIS. We summarize several of the key issues here.

We understand that the HCP may propose to translocate and establish new populations of the Santa Ana sucker (SAS) to certain portion of the HCP Plan Area that are not occupied by the SAS. SBVMWD and USFWS representatives have emphasized that the HCP will not impose any new or more stringent limitations on SCE's operations. It is important that the HCP describe in detail the proposed legal and practical mechanisms, and evaluate in detail a range of feasible alternatives, to avoid impacts to SCE's operations. The evaluation should include:

- A detailed description and evaluation of alternative SAS translocation sites. The range of alternatives that are evaluated in detail should include alternative translocation sites that do not include SCE facilities;
- The criteria that will be used to identify and propose alternative translocation sites;

January 24, 2019

- A detailed evaluation of the environmental impacts of alternative translocation sites, including the impacts on energy production and water supply;
- The feasibility and enforceability of measures proposed in the HCP to avoid impacts to SCE operations;
- Evaluation of the establishment of nonessential experimental populations of SAS pursuant to section 10(j) of the federal Endangered Species Act (16 U.S.C. §1539(j)) in sufficient detail to allow the USFWS to propose experimental population rules; and
- A plan to phase implementation of the translocation of SAS to allow sufficient time to monitor the success of any translocation, including the success of measures to avoid regulatory impacts on SCE hydroelectric facilities.

We understand that the HCP may include the establishment of a water bank to provide HCP permittees with an alternative water supply to mitigate impacts. The HCP should include a description and evaluation of the proposed water bank in sufficient detail to allow applicable state and federal agencies to approve the water bank under CEQA and NEPA without the need for additional environmental documentation.

We appreciate the opportunity to submit these comments and we look forward to collaborating with you on the scope and content of the HCP.

Very truly yours,

Handwritten signature of Kelly O'Donnell Henderson in cursive script.

Kelly O'Donnell Henderson

cc: Robert Thornton, Esq.
Matthew Woodhall