UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

MAR 07 2011

Mr. Jim Bartel
Field Supervisor
U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road, Suite 101
Carlsbad, CA 92011

Subject: Final Environmental Impact Statement for the San Diego County Water Authority Subregional Natural Community Conservation Plan/Habitat Conservation Plan, San Diego and Riverside Counties, California (CEQ#20110026)

Dear Mr. Bartel:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) and provided comments to the U.S. Fish and Wildlife Service ("Service") on June 10, 2010. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2), primarily because the document failed to sufficiently describe how climate change may affect the 64 species ("Covered Species") included in the Habitat Conservation Plan (HCP or the "Plan"). We also requested information describing the potential for San Diego County Water Authority ("Water Authority") activities to induce growth within the 992,000 acres of San Diego and southwestern Riverside Counties that would comprise the HCP, as well as information detailing how the Water Authority will work with the Service and the U.S. Army Corps of Engineers to comply with Section 404 of the Clean Water Act.

The FEIS addresses the major issues pertaining to climate change, induced growth, and wetlands protection identified in our review of the DEIS. EPA commends the Water Authority and the Service for preparing a response to our climate change concerns that references CEQ's draft climate change guidance. We also applaud the inclusion, in the HCP, of an adaptive management plan (AMP) and "changed circumstances process" to ensure the long-term protection and conservation of Covered Species and their habitats, including with regard to potential impacts that may result from

climate change. Additionally, we appreciate the detailed responses provided on induced growth and Section 404 compliance.

EPA has no objection to the proposed project; however, we recommend, both because of the breadth of the Covered Species included in the HCP, as well as the 55-year permit term, that the aforementioned AMP include comprehensive and robust monitoring for the effects of climate change, and provide for alteration of the Plan, accordingly, to protect and conserve said species and their habitats.

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at (415) 947-4221 or gerdes.jason@epa.gov.

Sincerely,

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

cc: Jenness McBride, Regional HCP Coordinator, U.S. Fish and Wildlife Service