

DEPARTMENT OF WATER RESOURCES

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**NOTICE OF PREPARATION****Environmental Impact Report for the
State Water Project San Joaquin Field Division
Operations and Maintenance Habitat Conservation Plan**

June 21, 2024

Introduction

Pursuant to the California Environmental Quality Act (CEQA), the California Department of Water Resources (DWR) will initiate preparation of an Environmental Impact Report (EIR) to evaluate the potential environmental effects associated with implementation of the California State Water Project (SWP) San Joaquin Field Division (SJFD) Operations and Maintenance Habitat Conservation Plan (HCP) and issuance of federal and state Incidental Take Permits (ITPs) (referred to as the Project). DWR is the lead agency under CEQA.

DWR prepared this Notice of Preparation (NOP) in accordance with CEQA to inform agencies, organizations, and interested parties that an EIR will be prepared for the Project. DWR is requesting input from agencies, organizations, and interested parties regarding the scope and content of the environmental analysis to be included in the EIR. In accordance with CEQA, DWR requests that agencies provide comments on the environmental issues related to the statutory responsibilities of their particular agency. This NOP contains a description of the Project, its location, and a preliminary overview of the environmental resource topics to be addressed in the EIR.

Issuance of a federal ITP is a federal action that must comply with the National Environmental Policy Act (NEPA). The U.S. Fish and Wildlife Service (USFWS) is the federal lead agency and will publish a Notice of Intent to formally initiate the NEPA process. As the federal lead agency under NEPA, USFWS will determine what type of document is required to satisfy the requirements of NEPA.

Project Location

The Project location encompasses the HCP Area, which includes the Permit Area and other areas where Conservation Actions would be implemented under the HCP (see Figure 1). The HCP Area is generally within the southern half of the Central Valley, extending from Kings County south to Los Angeles County, just south of the Tehachapi Mountains. The HCP Area spans portions of multiple counties consisting of Kings, Monterey, San Luis Obispo, Kern, Ventura, and Los Angeles. The Permit Area covers 13,882 acres over approximately 157 miles, a substantial portion of which is composed of the existing open water of the DWR aqueducts and hardscape associated with the DWR aqueducts, pumping plants, and other existing infrastructure. The Permit Area consists of the DWR SWP right-of-way (ROW) for portions of the California Aqueduct (CAAQ), an underground pipeline section of the Coastal Branch Aqueduct (CBA), the SJFD Operations and Maintenance Center, the underground ROW associated with the underground pipeline section of the CAAQ through the Tehachapi Mountains, and nine associated pumping plants within this Permit Area along the CAAQ and CBA. Specific locations for Conservation Actions are not known at this time,

but all Conservation Actions would occur within the broader HCP Area, which was delineated based on the boundaries of watersheds at the Hydrologic Unit Code 10 and 12 levels that intersect the Permit Area, with refinements to exclude areas that have no potential for Conservation Actions.

Regulatory Background

The HCP is intended to fulfill the requirements of the federal and state Endangered Species Acts, summarized below, as well as provide a framework for subsequent Covered Activity permitting requirements for federal Clean Water Act Sections 401 and 404, California's Porter-Cologne Water Quality Control Act, and California Department of Fish and Wildlife (CDFW) Streambed Alteration Agreement requirements (California Fish and Game Code [CFGF] Sections 1600–1616).

Federal Endangered Species Act

The federal Endangered Species Act (FESA) (16 USC Section 1531 et seq., as amended) prohibits the unauthorized "take" of a species that is listed as threatened or endangered. "Take" includes a range of activities that could result in death or injury to a species, including harm that foreseeably results from substantial adverse habitat modification (as defined in 50 Code of Federal Regulations Section 10.12). FESA Section 10 allows USFWS and the National Marine Fisheries Service to authorize the taking of species that is incidental to an otherwise lawful activity by a non-federal entity if the entity first prepares and agrees to implement a conservation plan that meets permit issuance criteria and minimizes and mitigates, to the maximum extent practicable, the potential impacts of such incidental take.

California Endangered Species Act

The California Endangered Species Act (CESA) (CFGF Section 2050 et seq.) generally prohibits the "take" (as defined in CFGF Section 86) of species that are listed or candidates for listing by the State of California. Take authorization may be obtained by project applicants from CDFW under CESA Section 2080.1 or 2081(b). Under Section 2080.1, if a species is listed by both FESA and CESA and the applicant has obtained a federal ITP, CDFW can issue a consistency determination that finds the federal documents consistent with CESA. Alternatively, CDFW can issue an ITP under CFGF Section 2081(b), which allows take that is incidental to an otherwise lawful activity. In July 2023, California Senate Bill 147 amended the CFGF to allow CDFW to issue a permit under CESA to authorize the take of a Fully Protected species resulting from impacts attributable to implementation of specified projects, including implementation of a maintenance, repair, or improvement project to SWP facilities undertaken by DWR. Permittees must implement species-specific Avoidance and Minimization Measures (AMMs) and fully mitigate the impacts of the project. The HCP is not a required component of the CESA ITP application (as it is for the FESA ITP application process). However, the HCP serves as a tool for describing and analyzing the Project's effects to meet the CESA permit issuance criteria.

Project Description

Project Background and Purpose

The SWP is the nation's largest state-built water and power development and conveyance system. It includes facilities that capture, store, and convey water to 29 water agencies serving 27 million Californians and 750,000 acres of irrigated farmland. Proper operation of the SWP is critical to the people and economy

of California, and routine maintenance of SWP facilities is required to ensure its proper operation. The SJFD is responsible for the maintenance, repair, and improvement of existing features of the SWP within the SJFD service area, including, but not limited to, the following activities:

- Continued function of pumping plants, control systems, check structures, and turnouts
- Delivery of water via the aqueducts to communities and agriculture
- Maintenance of electrical, mechanical, and mobile equipment
- Maintenance of all buildings and structures, including open-air canals and underground pipelines
- Repair and reconstruction on the above-listed features
- Management of vegetation within the SWP ROW

Maintenance and repairs within the SJFD service area can be described as either routine, urgent, or emergency. Routine maintenance is typically conducted every 1 to 5 years, and sometimes up to every 10 years, depending on the type of maintenance being performed. Urgent actions are those where SJFD must act quickly to maintain or repair SWP infrastructure to prevent additional damage, but where an emergency has not been identified. Emergency activities are conducted in response to sudden, unexpected events that require immediate action to prevent or mitigate the loss of/damage to life, health, property, or necessary public services (i.e., SWP deliveries).

Under existing conditions, SWP maintenance, repair, and improvement activities are limited to specific boundaries and/or times of year to avoid incidental take of listed species, or the activities require individual ITPs on a project-by-project basis. This individual permitting process is slow and costly, which can prevent some needed maintenance, repair, and improvement activities from happening in a timely fashion. This creates a backlog of maintenance, repair, and improvement work, creating challenges for SJFD staff, reducing SWP capacity, and increasing costs and complexity compared to performing the work earlier on an as-needed basis.

The Project purpose is to allow for efficient and cost-effective maintenance, repair, and improvement activities within the SJFD service area of SWP facilities while providing for the conservation of Covered Species to comply with the permitting criteria of FESA Section 10(a)(1)(B), CFGC Section 2081 (i.e., CESA), and the permitting process for Fully Protected species established by California Senate Bill 147. The HCP fully mitigates the impact of the incidental take of Covered Species associated with maintenance, repair, and improvement activities identified as Covered Activities under the HCP.

The HCP performs the following functions:

- Provides a comprehensive set of AMMs for planned Covered Activities to avoid and minimize, to the maximum extent practicable, take of Covered Species.
- Provides mitigation through habitat acquisition and management, habitat restoration and management, connectivity improvements, and other means (collectively, Conservation Actions) to fully mitigate the effects of the Covered Activities on Covered Species.
- Provides for the protection and enhancement of stream, riparian, and aquatic resources, which are vital to maintain water quality throughout the region.
- Allows for an expedited and predictable process for permitting DWR maintenance, repair, and improvement activities under FESA and CESA, and establishes the basis for subsequent permitting

of these activities under Clean Water Act Sections 401 and 404, the Porter–Cologne Water Quality Control Act, and CFGC Sections 1600–1616.

- Provides future incidental take authorization of currently non-listed species that may become listed under one or both of FESA and CESA during the Permit Term.

The HCP identifies the effects of Covered Activities on Covered Species and describes a Conservation Strategy to conserve the Covered Species and achieve the Biological Goals and Objectives for Covered Species. USFWS and CDFW (collectively, the Wildlife Agencies) would each issue ITPs under FESA Section 10(a)(1)(B) and CESA Section 2081 to DWR to authorize take of Covered Species incidental to Covered Activities. DWR is seeking ITPs that remain in effect for a Permit Term of 50 years.

Covered Species

The HCP covers 17 Covered Species consisting of 3 plant species and 14 wildlife species. Covered Species are listed in Table 1.

Table 1. State Water Project San Joaquin Field Division Operations and Maintenance Habitat Conservation Plan Covered Species

Common Name	Scientific Name	Status (Federal/State)
Invertebrates		
Crotch's bumble bee	<i>Bombus crotchii</i>	None/SC
monarch	<i>Danaus plexippus</i>	FC/None
Amphibians and Reptiles		
California red-legged frog	<i>Rana draytonii</i>	FT/SSC
western spadefoot	<i>Spea hammondi</i>	PT/SSC
blunt-nosed leopard lizard	<i>Gambelia sila</i>	FE/SE, FP ¹
Birds		
tricolored blackbird	<i>Agelaius tricolor</i>	None/ST, SSC
burrowing owl	<i>Athene cunicularia</i>	None/SSC ²
Swainson's hawk	<i>Buteo swainsoni</i>	None/ST
Mammals		
San Joaquin antelope squirrel	<i>Ammospermophilus nelsoni</i>	None/ST
giant kangaroo rat	<i>Dipodomys ingens</i>	FE/SE
short-nosed kangaroo rat	<i>Dipodomys nitratoides brevinasus</i>	None/SSC
Tipton kangaroo rat	<i>Dipodomys nitratoides nitratoides</i>	FE/SE
Buena Vista Lake ornate shrew	<i>Sorex ornatus relictus</i>	FE/SSC
San Joaquin kit fox	<i>Vulpes macrotis mutica</i>	FE/ST
Plants		
Kern mallow	<i>Eremalche parryi</i> ssp. <i>kernensis</i>	FE/None
San Joaquin woollythreads	<i>Monolopia congdonii</i>	FE/None
Bakersfield cactus	<i>Opuntia basilaris</i> var. <i>treleasei</i>	FE/SE

Notes:

Status

Federal Endangered Species Act: PT = Proposed Threatened; FC = Candidate; FT = Threatened; FE = Endangered

California Endangered Species Act: SC = Candidate; ST = Threatened; SE = Endangered; FP = Fully Protected species under the California Fish and Game Code

Other State Status: SSC = Species of Special Concern.

- ¹ Blunt-nosed leopard lizard is Fully Protected under California Fish and Game Code Section 5050. However, on July 10, 2023, Senate Bill 147 was signed into law and amends the Fish and Game Code to allow a 10-year permitting mechanism for a defined set of projects within the renewable energy, transportation, and water infrastructure sectors, including maintenance, repair, and improvements to State Water Project facilities undertaken by the Department of Water Resources. The Covered Activities qualify for this permitting process.
- ² In March 2024, burrowing owl was petitioned for listing as endangered or threatened under the California Endangered Species Act, but it has not been formally evaluated for candidacy.

Covered Activities

Covered Activities under the HCP include routine maintenance, repair, and improvement activities; Conservation Actions implemented on nonoperational DWR lands or off-site Preserve lands under the HCP Conservation Program; and some emergency activities conducted by DWR. Activities conducted by third parties and coverage for other DWR activities are also included. These are discussed further below.

Maintenance, Repair, and Improvement Covered Activities

The primary Covered Activities under the HCP consist of the current and foreseeable routine maintenance, repair, and improvement activities required to ensure continued function of the SWP within the SJFD service area, as well as those activities that do not regularly occur but are anticipated to occur during the Permit Term due to changes in SWP facilities or environmental conditions. Activities are typically performed every 1 to 5 years, and sometimes up to every 10 years. Routine maintenance, repair, and improvements are categorized into the following main components, which broadly define the types of activities covered by the HCP:

1. **Upland vegetation management**, including mowing, burning, tree and shrub trimming and removal, discing of firebreaks, herbicide application, and livestock grazing.
2. **Road maintenance and construction**, including grading, road repair and minor new construction, and berm and V-ditch installation and repair.
3. **Conveyance, water storage, and drainage features maintenance**, including pond and drainage maintenance and installation, aquatic vegetation management, and conveyance structure repairs.
4. **Miscellaneous erosion repairs**, including to embankments, hillsides, and other targeted locations.
5. **Animal abatement**, including surface treatments to discourage burrowing, and live trapping and control.
6. **Pumping plant maintenance**, including repairs and maintenance of plant, valve, and radial gates, and installation and repair of surveillance instruments.
7. **Subsidence repairs**, including various repair at various locations on the CAAQ.
8. **Miscellaneous maintenance, repair, and improvement activities**, including borrow, stockpile, and spoil site creation, use, and maintenance; dewatering; fencing installation, repair, and maintenance; patrolling and inspections; geotechnical investigations; and observation well installation and monitoring.
9. **Fire and security modernization**, including modernization of pumping plants and operations and maintenance centers.

Conservation Program Covered Activities

In addition to the maintenance, repair, and improvement activities and actions described above, take authorization is being sought for activities on DWR lands and other conservation lands associated with implementation of the HCP Conservation Strategy. Conservation Program Covered Activities are divided into the following categories:

- **Management and monitoring**, including vegetation management, including livestock grazing, mowing, string trimming, manual removal, establishment of fuel breaks, and prescribed burns; vehicle and pedestrian travel, including by all-terrain vehicles and trucks, for inspecting and maintaining facilities, moving and managing livestock, and patrolling; use of mechanized equipment for construction, maintenance, and resource management projects in mitigation areas (e.g., vehicles, weed trimmers, mowers); activities to control non-native plant and wildlife species; installation and repair of fencing; construction, operation, and maintenance of pipelines providing irrigation to support Conservation Actions; hazardous materials remediation, such as appropriate closure of underground storage tanks, soil remediation, and cleanup of illegal dumping; modification and use of existing structures for uses related to management of conservation lands; construction of unpaved roads and stream/channel crossings to provide access to conservation lands; and species and habitat surveys and monitoring.
- **Habitat enhancement, restoration, and creation**, including demolition and removal of structures, roads, and built facilities to enhance or re-establish habitat; vegetation management to restore or enhance habitat, including grazing of livestock, mowing, manual removal, and prescribed burns; restoration of historical/natural hydrologic conditions; construction, operation, and maintenance of pipelines to provide irrigation; and activities to enhance or re-establish species habitat, such as installation of raptor perches and bat boxes, and creation of aquatic resources.
- **Existing utility maintenance and repair**, including for electrical, natural gas, water, wastewater, and cell tower facilities within existing ROW easements.

Emergency Covered Activities

Potential foreseeable emergency projects include actions that are likely to occur but for which the times and locations are unpredictable. This category includes repairs of facilities for conditions that immediately threaten the integrity of the CAAQ, CBA, or pumping plants, such as canal or pipeline leaks; canal lining slips or cracks; slumps, slides, or major subsidence; catastrophic failure of water-contractor, easement-holder, or encroachment-permit-holder facilities (e.g., pipelines, pumps, roadways); and damage related to natural hazards (e.g., floods, wildfires, earthquakes). Emergency projects require immediate action to repair the integrity of the facility and avoid impacting public health and safety. Repairs of this type are part of regular maintenance activities, but this category also applies to repairs that may extend outside of the designated area affected by maintenance. For example, failure of a protective embankment may require work outside of the area designated as the embankment and into surrounding portions of the ROW not considered part of the embankment itself. However, DWR does not conduct repairs outside of the Permit Area. These actions would be taken immediately, not as part of scheduled maintenance, and it may be necessary to ignore time-of-day and seasonal constraints when conducting emergency repairs to protect facility integrity and public health and safety.

Third-Party Covered Activities

Third parties whose facilities or activities may be covered by the HCP are divided into the following four categories: (1) owners of existing facilities, (2) water contractors, (3) easement holders, and (4) encroachment permit holders. Third parties are responsible for their own compliance and mitigation, including the costs for planning, permitting, and implementing any requirements. Third-Party Covered Activities include the following:

1. **Vehicle and equipment use** of roads and parking areas to access turnouts, turnins, pipelines, and other facilities within the ROW. Activities include performing minor repairs to eroded road surfaces and canal embankments with hand tools, compaction equipment, and earthmoving equipment to maintain access.
2. **Fencing installation and repair** adjacent to or crossing turnouts, turnins, pipelines, and other facilities. Infrequent removal and replacement of limited portions of fencing may be required during installation, repair, and maintenance of facilities.
3. **Access and use of turnout areas.** Construction, operation, and maintenance activities may extend beyond the paved, graveled, or graded surfaces to operate, maintain, access, or install buried pipelines, or to remove tumbleweeds accumulated against fencing.
4. **Herbicide spraying and burrowing rodent control.**
5. **Upland vegetation removal**, including accumulated live and dead brush at fence lines and over and adjacent to meter vaults, buried pipelines, and other facilities to maintain clear and safe access; prevent facility damage; and provide for maintenance, repair, and improvement of facilities.
6. **Pipeline, turnin, and turnout facility** access, operation, maintenance, construction, repair, and replacement of existing and future pipeline, turnin, and turnout facilities, whether above or below ground.
7. **Electric and communication line** access, construction, maintenance, repair, improvement, and replacement of existing and future electric and communication lines.
8. **Drainage channel** access, construction, maintenance, repair, improvement, and replacement of existing and future natural and artificial drainage channels crossing the ROW, including related facilities within or immediately adjacent to said crossings.
9. **Road and livestock crossing** access, construction, maintenance, repair, improvement, and replacement of existing and future road and livestock crossings of the ROW, including related facilities within or immediately adjacent to said crossings.
10. **Emergency actions** such as those described above under "Emergency Covered Activities."

Other Covered Activities

A new type of activity not specifically identified in the HCP might be covered under the HCP ITPs if DWR determines adequate take coverage remains available and if the activity has not already been considered but rejected for coverage under the HCP. These other activities could potentially be covered by the ITPs through a minor amendment to the HCP Implementing Agreement without requiring an ITP amendment.

Conservation Strategy

The HCP's Conservation Strategy consists of Biological Goals and Objectives; an environmental screening program to assess Covered Activities and select applicable AMMs to avoid and minimize take of Covered Species and impacts to their habitat; AMMs applicable to all Covered Activities, specific Covered Activities, and specific Covered Species or Covered Species groupings; compensatory mitigation obligations to mitigate unavoidable take; and a monitoring and management program.

Biological goals are broad, guiding principles that describe desired future conditions, and biological objectives are concise statements of how to achieve each goal that provide the basis for identifying conservation measures, establishing the monitoring direction, and assessing the effectiveness of the Conservation Strategy. The HCP's Biological Goals and Objectives are focused on avoiding and minimizing impacts to Covered Species, maintaining habitat quality, reducing effects of emerging threats and stressors, conserving habitat, enhancing habitat connectivity and facilitating wildlife movement, and conducting coordinated monitoring and management.

The environmental screening program will assess Covered Activities and identify the appropriate AMMs to avoid and minimize take of Covered Species and impacts to their habitat from Covered Activities through four phases: project scoping; environmental review, studies, and analyses; environmental clearance; and post-activity reporting.

The Conservation Strategy also includes lists of general, activity-specific, and species-specific AMMs to avoid and minimize take of Covered Species and their habitats from Covered Activities, as well as measures to mitigate unavoidable take of Covered Species and impacts to their habitat from Covered Activities. Measures to mitigate unavoidable take include creation of habitat Preserves on DWR fee-owned lands; habitat acquisition and preservation on non-DWR habitat lands; mitigation/conservation banks and in-lieu fee programs; development and implementation of site-specific habitat creation, restoration, or enhancement plans to create or restore habitat conditions that previously existed in currently disturbed areas; implementation of wildlife movement functional enhancements, such as overchute and fencing retrofits or new aqueduct overcrossings; and other conservation measures as approved by the Wildlife Agencies.

The monitoring and management program would monitor compliance with the HCP and ITP conditions and the effectiveness of the Conservation Strategy in achieving the Biological Goals and Objectives, allowing for an adaptive management approach over the Permit Term.

Probable Environmental Effects of the Project

Pursuant to CEQA Guidelines Section 15063(a), DWR has elected to proceed directly to the preparation of an EIR rather than preparing an Initial Study. DWR, as the lead agency, will describe and analyze the significant environmental effects of the Project. The EIR will include the suite of resource topics contained in Appendix G of the CEQA Guidelines, as follows:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy

- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Where the potential for the Project to cause significant environmental impacts is identified, the EIR will include feasible mitigation measures to avoid or substantially lessen those impacts. The analysis for all topics will address direct and indirect impacts of the Project, as well as cumulative impacts. Consistent with CEQA Guidelines Section 15130, cumulative impacts will be discussed where the incremental impact of the Project is cumulatively considerable when combined with other area projects. The EIR will also evaluate the potential for the Project to induce growth. In accordance with CEQA Guidelines Section 15126.6, the EIR will describe a range of reasonable alternatives to the Project capable of meeting most of the Project objectives and that would avoid or substantially lessen any potentially significant effects identified for the Project.

Public Scoping Comment Period and Meeting

As required by the CEQA Guidelines, within 30 days after receiving the NOP, each responsible and trustee agency is required to provide the lead agency with specific detail about the scope, significant environmental issues, reasonable alternatives, and mitigation measures related to the responsible or trustee agency's area of statutory responsibility that will need to be explored in the EIR. In the response, responsible and trustee agencies should indicate their respective level of responsibility for the Project.

This NOP is being furnished to obtain suggestions and information from other agencies and the public on the scope of issues and alternatives to consider in developing the EIR. The primary purpose of the scoping process is to identify important issues raised by the public and responsible and trustee public agencies related to the issuance of regulatory permits and authorizations, and natural resource protection. Written comments from interested parties are invited to ensure that the full range of environmental issues related to development of the EIR are identified. All comments received, including names and addresses, will become part of the official administrative record and may be made available to the public.

The Project is of statewide, regional, and/or area-wide significance; therefore, a CEQA scoping meeting is required pursuant to Public Resources Code Section 21083.9(a)(2). **During the 30-day public scoping period, DWR will hold two public scoping meetings, as follows: on Tuesday, July 16, 2024, from 10:00 a.m. to 11:00 a.m. and 6:00 p.m. to 7:00 p.m. The content provided at both meetings will be the same. Meetings will be held virtually via online Zoom webinar. Register to attend at <https://bit.ly/3VxNSti>.**

The public scoping meetings will provide an additional opportunity to receive and disseminate information, identify potential environmental issues of concern, and discuss the scope of analyses to be included in the EIR. The scoping meetings are not public hearings, and no decisions on the Project will be made at these meetings. The scoping meetings are provided as an additional opportunity for agencies, organizations, and the public to provide comments on what environmental issues should be addressed

in the EIR. All public agencies, organizations, and interested parties are encouraged to attend and participate in one of the meetings.

All scoping comments must be received in writing by 5:00 p.m. on Monday, July 22, 2024, which marks the end of the 30-day public scoping period. All written comments should indicate an associated contact person for the agency or organization, if applicable, and reference the Project name in the subject line. Pursuant to CEQA, responsible agencies are requested to indicate their statutory responsibilities in connection with the Project when responding. Mail or email comments and direct any questions to the following contact person:

Shelly Amrhein
Manager, Habitat Conservation Planning Section
Department of Water Resources
Operations and Maintenance, Environmental Assessment Branch
P.O. Box 942836
Sacramento, CA 94236-0001
Email: Rochelle.Amrhein@water.ca.gov

If comments are provided via email, please include “San Joaquin Field Division Habitat Conservation Plan” in the subject line, attach comments in Microsoft Word format, and include the commenter’s U.S. Postal Service mailing address.

Privacy Notice

DWR’s practice is to make the entirety of comments received as part of the public record. Therefore, names, home addresses, home phone numbers, and email addresses of commenters, if included in the response, will be made part of the record available for public review. Individual commenters may request that DWR withhold their name, home address, and other information, but you must state this prominently at the beginning of your comments. In the absence of this written request, this information will be made part of the record for public review. DWR will always make submissions from organizations and businesses, and from individuals identifying themselves as representatives of, or officials of, an organization or business, available for public inspection in their entirety.



SOURCE: OpenStreetMap (2019), State of California (Nov. 2020)



FIGURE 1

HCP Area