

TABLE 1
SANTA ANA RIVER CONSERVATION AND CONJUNCTIVE USE PROJECT (SARCCUP) CEQA
ASSESSMENT OF NOP COMMENTS

Date	Commenter	Environmental Issues Raised in Comment Letter	Response	Applicable PEIR Section
Native American Heritage Commission (NAHC)				
11/8/16	Native American Heritage Commission (NAHC)	AB52: Tribal consultation requirements for CEQA and impacts to Tribal Cultural Resources	AB52 process in progress	3.5 Cultural Resources and Tribal Cultural Resources
		NAHC Recommendations for Cultural Resources Assessments	Recommendations to be implemented as part of process to evaluate impacts to cultural resources	3.5 Cultural Resources and Tribal Cultural Resources
South Coast Air Quality Management District (SCAQMD)				
11/9/16	South Coast Air Quality Management District (SCAQMD)	Requests receipt of EIR with Air Quality calculation spreadsheets, modeling files, and health risk assessment files; Recommends use of CalEEMod.	Air quality analysis will be conducted and documented accordingly and using CalEEMod	3.3 Air Quality
		Suggests a health risk assessment be prepared if the project generates or attracts vehicle trips	Not anticipated to be required and will be explained in PEIR	3.3 Air Quality
Riverside County Flood Control and Water Conservation District				
11/22/16	Riverside County Flood Control and Water Conservation District	District approvals may be required for any work within District rights of way or easements; if so, District will be responsible agency under CEQA.	For projects that affect District facilities, rights-of-way, or easements, the agencies will coordinate with the District, as necessary, to secure necessary permits and approvals. This will be acknowledged in the PEIR.	2.0 Project Description
		The PEIR should address impact to flood control facilities, changes in drainage patterns, and mapped floodplains.	For projects that affect District facilities, the PEIR will disclose potential impacts to flood control facilities, impacts to flow in rivers, creeks, and channels relative to existing capacity, impacts to drainage patterns and mapped flood plains.	3.9 Hydrology and Water Quality
		Any potential conflicts between the proposed habitat restoration activities and flood control maintenance should be addressed.	PEIR will discuss BMPs and scheduling of habitat restoration such that flood control maintenance will not be affected.	3.9 Hydrology and Water Quality; 3.4 Biological Resources
California Department of Fish and Wildlife (CDFW)				
11/29/16	California Department of Fish and Wildlife (CDFW)	The PEIR should include an assessment of habitat types, a general biological inventory of species present in the project areas (CNDDDB search), and an inventory of rare, threatened, endangered species within the project footprint. Focused species-specific surveys are required.	The Environmental Setting of Section 3.4, Biological Resources of the PEIR will include an assessment of habitat types, a CNDDDB search, and a listing of special-status species. Due to programmatic nature of the analysis, focused surveys will not be conducted. Mitigation measures will outline procedures to be followed when projects are implemented.	3.4 Biological Resources

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			Mitigation measures will include performance criteria as necessary to ensure mitigation is not being deferred.	
		PEIR should include analysis of direct and indirect impacts (particularly wildlife movement corridors), open space, and cumulative impacts.	Wildlife movement corridors and open space/protected areas will be analyzed accordingly under Appendix G, CEQA Guidelines. All cumulative impacts pertaining to biological resources will be analyzed within the cumulative impacts section	3.4 Biological Resources; 5.0 Cumulative Impacts
		The CDFW suggests using specific mitigation measures.	Mitigation Measures for the programmatic analysis will outline procedures to be followed when projects are implemented, to avoid or lessen potentially significant impacts. Mitigation measures will include performance criteria as necessary to ensure mitigation is not being deferred.	3.4 Biological Resources
Monte Vista Water District (MVWD)				
12/7/16	Monte Vista Water District (Public Scoping Meeting Oral Comments)	MVWD requests extension of comment period by one to two weeks.	The NOP comment period was extended (one month) through January 12, 2017.	N/A
		MVWD stated that an upcoming comment letter will cover importing water to Chino Basin	Comment noted	N/A
		The proposed infrastructure may be different than currently planned, and the environmental document (PEIR) should note that further environmental review may be necessary.	If proposed facilities' locations or designs are undetermined or preliminary in nature, the PEIR will note that further environmental analysis may be required under CEQA.	N/A
		The upcoming comment letter will cover additional scoping/meeting to discuss with IEUA the Chino Basins specifically and environmental issues.	Comment noted	N/A
City of Chino				
12/9/16	City of Chino	The PEIR should thoroughly discuss/evaluate: All potential and anticipated impacts to the safe yields of the affected groundwater basins within the project area. Impacts and any proposed MMs should be described qualitatively and quantitatively.	The PEIR will describe the following for each groundwater basin affected by the project: the safe yield (and any constraints); the available storage (and any constraints); the existing operating criteria, adjudication, and agreements as applicable; the existing processes in place for approval of new facilities. The PEIR will explain how the proposed project will operate within these conditions, constraints, and processes. The PEIR will include mitigation measures outlining the	3.9 Hydrology and Water Quality
		The PEIR should thoroughly discuss/evaluate: Explanation and verification of basin storage capacities characterized as "available."		

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			procedures to be followed when projects are implemented to avoid or lessen potentially significant impacts. Mitigation measures will include performance criteria as necessary to ensure mitigation is not being deferred.	
		The PEIR should thoroughly discuss/evaluate: Potential competing interests (i.e. local native water, imported supplemental water) for basin storage capacity and associated institutional and/or physical hurdles to project implementation.	Operating criteria for the proposed project will be explained, relative to timing of water availability for this project versus other existing obligations, agreements, projects, competing interests.	3.9 Hydrology and Water Quality; 2.0 Project Description
		The PEIR should thoroughly discuss/evaluate: Potential competing interests for recycled water in-exchange for pumped groundwater and associated institutional and physical hurdles to project implementation.		
		The PEIR should thoroughly discuss/evaluate: All potential and anticipated impacts of the operations/obligations (current and planned) of retail water supplies, including (in the Chino Basin) all stakeholder water supply plans and Optimum Basin Management Program elements/activities, including but not limited to desalter operations, Basin recharge, and existing conjunctive use arrangements.		
		The PEIR should thoroughly discuss/evaluate: Discussion of Phase 2 implementation. To the extent possible afforded by program-level analysis, identify facilities that will be needed and how they will be used. Discuss likelihood of subsequent CEQA analyses (project level) that may be appropriate.	Future additional phases of SARCCUP have not yet been conceived but would result in an expansion of the proposed Conjunctive Use Program. Subsequent environmental analysis pursuant to CEQA would be required for modifications to the SARCCUP project description.	1.0 Introduction
		<p>The PEIR should thoroughly discuss/evaluate: There is potential for increasing the yield of Chino Basin by 10,000 AFY by producing GW that enters the southern portion of the basin from the SAR but then exits the Basin before it can be produced by existing wells.</p> <p>The PEIR should examine the relationship between this water and the NOP-described project target production of 3,000 gpm from new and/or existing wells in exchange for recycled water delivered to Orange County.</p>	<p>The PEIR will describe the following for each groundwater basin affected by the project: the safe yield (and any constraints); the available storage (and any constraints); the existing operating criteria, adjudication, and agreements as applicable; the existing processes in place for approval of new facilities.</p> <p>The PEIR will explain how the proposed project will operate within these conditions, constraints, and processes. The PEIR will include mitigation measures outlining the procedures to be followed when projects are implemented to avoid or lessen potentially significant impacts. Mitigation measures will include performance criteria as</p>	3.9 Hydrology and Water Quality

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			necessary to ensure mitigation is not being deferred.	
San Bernardino County Department of Public Works (SBC DPW)				
12/9/16		The PEIR should comprehensively identify any physical changes to the environment and include identification of all project-related impacts to DPW facilities.	The PEIR will identify all projects with potential to affect DPW facilities, and the potential impacts associated with such projects.	3.9 Hydrology and Water Quality; 3.4 Biological Resources
		The PEIR should identify alternative locations.	Feasible alternatives, including alternative locations for facilities, will be discussed in the PEIR as required by CEQA based on the determination of potentially significant project impacts and the need for alternatives to avoid or lessen such impacts.	7.0 Alternatives
		If projects would occur on District property, the PEIR should identify any benefits of mitigation credits that benefit the District.	Comment noted.	3.9 Hydrology and Water Quality
		The PEIR should identify encroachments on DPW rights-of-way, modifications or new structures that require a permit. The PEIR should acknowledge that DPW facilities built by the USACE will require DPW to obtain approval (408 permit) from the USACE.	For projects that affect DPW facilities, rights-of-way, or easements, the agencies will coordinate with DPW, as necessary, to secure permits and approvals. This includes potential approvals required from the USACE, such as a Section 408 permit. This will be acknowledged in the PEIR.	2.0 Project Description; 3.9 Hydrology and Water Quality
		The PEIR should address water spreading agreements that may need to be modified.	The PEIR will include a description of existing operating criteria for each basin, existing agreements between the agencies and the DPW affected by the project, and the need for any modifications or amendments to such agreements in order to proceed with project implementation.	2.0 Project Description
		For projects proposed within DPW right-of-way, the PEIR should assess potential impacts to biological resources and develop appropriate mitigation measures if necessary.	Potential impacts to biological resources will be identified for all project components, including those within DPW's rights-of-way. If necessary, mitigation measures will be developed to identify the required steps to avoid or minimize potentially significant impacts. Mitigation measures will include performance criteria as necessary to ensure mitigation is not being deferred.	
		District land will not be used for mitigation associated with this project.	Comment noted.	N/A
Office of Planning & Research (OPR)				
12/12/16	Office of Planning & Research (OPR)	OPR received the extension notice.	Comment noted	N/A

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Orange County Public Works (OCPW)				
12/12/16	Orange County Public Works	OCPW would like to be advised of any further development and kept on distribution list.	OCPW will be notified of any future development under SARCCUP	N/A
Southern California Association of Governments (SCAG)				
12/12/16	Southern California Association of Governments (SCAG)	Request to send environmental documentation to SCAG's Los Angeles office.	SARCCUP environmental documentation will be sent to SCAG's LA Office	N/A
		Provides goals, regional growth forecasts and demographics; Suggested mitigation measures within the Final PEIR for the 2016 RTP/SCS.	Demographic and population data will be incorporated into the analysis of growth inducement to be included in the PEIR. Mitigation is not anticipated to be required and will be explained in PEIR	6.0 Growth Inducement
Orange County Fire Authority (OCFA)				
12/13/16	Orange County Fire Authority	Depending on the size of the facilities expansion, this project may be subject to a Secure Fire Protection Agreement with Orange County Fire Authority.	Comment noted. Agencies will coordinate with Fire Authority, if necessary.	3.14 Public Services
Running Springs Water District (RSWD)				
12/21/16	Running Springs Water District	RSWD would like credit for continuing 500 AFY of treated wastewater into the Bunker Hill Basin.	Comment noted.	N/A
San Antonio Water Company (SAWC)				
1/4/17	San Antonio Water Company	Implementation of SARCCUP could result in loss of hydraulic control (HC) in the Chino Basin. With HC there are no losses. With SARCCUP there is potential for losses. Who would absorb these losses?	The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.	3.9 Hydrology and Water Quality
		Who is leading program and who will be paying for it?	Santa Ana Watershed Project Authority (SAWPA) will be leading the program. The operation of SARCCUP will be explained in the PEIR. Each member agency will fund proposed projects within their jurisdiction	2.0 Project Description
		Will all water producers in Chino Basin have water available to them for purchase? What will be the cost?	The distribution of water to Chino Basin water producers will be explained in the PEIR.	2.0 Project Description
		Who owns and operates new production wells in SBBA?	San Bernardino Valley Municipal Water District would own/operate new production wells in SBBA.	2.0 Project Description
		Please explain in-lieu recharge.	In-lieu recharge is the process of temporarily decreasing the amount of groundwater pumped from a basin, in combination with increasing surface water deliveries. Typically, the decrease in groundwater pumping occurs in wet years when surface water supplies can be delivered "in-lieu" of	2.0 Project Description

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			groundwater pumping. Decreasing pumping allows the natural recharge to accumulate in the groundwater basin for use during dry years.	
		Why are the interties in the Chino Basin the only ones proposed?	This will be explained in the project description.	2.0 Project Description
		Explain the reasoning for the amenities around the recharge basin in the San Jacinto Basin Area	EMWD has negotiated these recreation amenities with the City of San Jacinto. This will be explained in the project description.	2.0 Project Description
		Please explain relationship between SARCCUP and San Antonio Water Company's recharge in the San Antonio Channel. SAWCo's recharge is metered. How SARCCUP distinguish between local native water and imported water. Is the confluence of water recharge a problem?	SARCCUP's operational parameters will be explained in the project description.	2.0 Project Description
		What is being fixed with SARCCUP and how would it relate to safe yield?	SARCCUP is a water supply reliability project. The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.	3.9 Hydrology and Water Quality
		Was there a Material Physical Injury Analysis done?	The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control in the Chino Basin. As such, a Material Physical Injury Analysis is not being prepared for the PEIR.	3.9 Hydrology and Water Quality
		How would SARCCUP relate to the utilization of available groundwater capacity by owners of rights in the basin with respect to priority and preference over storage for export as stated in the Judgment?	SARCCUP is a groundwater banking project that will supplement adjudicated water supplies. The operational criteria for SARCCUP will explain the priority for storage and extraction relative to existing groundwater rights.	2.0 Project Description
Water Facilities Authority (WFA)				
1/11/17	Water Facilities Authority (WFA)	WFA states that SARCCUP will require approval through the Watermaster process and could have significant operational impacts on the WFA and its member agencies.	Operational criteria for SARCCUP will be explained in the PEIR	2.0 Project Description
		The PEIR needs to address the uncertainty associated with the SARCCUP project components in the Chino Basin.	The PEIR will analyze impacts associated with project implementation within the Chino Basin in accordance with the information and level of detail available	2.0 Project Description
		Requests that additional scoping be added within the framework of the currently proposed CEQA outline.	Comment noted	N/A
		1. Describe qualitatively and quantitatively the	The PEIR will describe the how	2.0 Project

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		impacts to Chino Basin Safe Yield, Safe Storage Capacity, and HC. As part of the analysis, please provide a specific explanation and verification of the "available storage space" within Chino Basin to support project.	SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.	Description; 3.9 Hydrology and Water Quality
		2. Describe qualitatively and quantitatively the impacts to Metropolitan's DYY Program. Analysis needs to evaluate the ability of DYY participants to perform under simultaneous implantation of Metropolitan's DYY Program and SARCCUP.	The PEIR project description will include operational criteria for SARCCUP and will explain the relationship of SARCCUP to Metropolitan's DYY Program.	2.0 Project Description; 3.9 Hydrology and Water Quality
		3. Describe qualitatively and quantitatively the impacts of any proposed redirection of imported water supplies during SARCCUP "storage calls" inclusive of location operational and water quality impacts.	The PEIR project description will include operational criteria for SARCCUP relative to existing operations of Chino Basin water agencies.	2.0 Project Description
		4. Describe qualitatively and quantitatively the impacts to approved and planned production, recharge, and basin management projects that may beneficially impact the Basin, including potential yield enhancement and production sustainability projects.	The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.	3.9 Hydrology and Water Quality; X.X Cumulative Impacts
		5. Describe qualitatively and quantitatively the impacts to existing and future recycled water program development for direct use, groundwater recharge and groundwater exchange within the Chino Basin. Describe Analysis will need to evaluate all current and planned uses of recycled water supplies in Chino Basin to meet demand, and potential impacts the use of recycled supplies for SARCCUP deliveries might have on individual member agencies rights under the Chino Basin Regional Sewer Services Contract.	The operation of SARCCUP relative to existing and future recycled water programs in the Chino Basin will be explained in the PEIR.	2.0 Project Description; X.X Cumulative Impacts
		6. Identify institutional obstacles to project implementation, including consistency of SARCCUP with other programs in the Chino Basin, such as the Peace Agreement, which requires broad regional benefits and mitigation of Material Physical Injury as defined by the Agreement. .	The operation of SARCCUP relative to other Chino Basin programs and agreements will be explained in the PEIR project description.	2.0 Project Description
		The PEIR should provide more detailed identification of Phase 2 facilities and how they would be implemented.	Clarification regarding future phases will be explained in the PEIR.	2.0 Project Description
Metropolitan Water District of Southern California (MWD)				
1/11/17	Metropolitan Water District of Southern California (MWD)	MWD does not consent to its member agencies purchasing SWP supplies directly from SBVMWD (MWD's SWP contract Article 15d requires MWD's consent for any other SWP contractor to supply water within MWD's boundaries). As such, suggest deleting "State Water Project water purchased from SBVMWD and wheeled to the storage locations" from the sources of water listed on page 7 of NOP.	This statement will be not be included within the PEIR	2.0 Project Description
		The use of Devil Canyon-Azusa pipeline need to be coordinated with MWD staff.	Will coordinate with MWD	N/A
Fontana Water Company (FWC)				
1/11/17	Fontana Water Company	1. What will be the net effect of using additional storage in local groundwater basins on the basins' safe yield, HC, and water quality at the Desalter	The PEIR will describe the how SARCCUP will be operated within existing constraints and	3.9 Hydrology and Water

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		treatment facility?	limitations on storage, safe yield and hydraulic control.	Quality
		2. Lytle Creek is governed separately from the Bunker Hill Basin and should be recognized as such – FWC and Fontana Union Water Company hold rights to surface and ground water resources in Lytle Creek.	Comment noted	N/A
		3. Will in-lieu water purposes under the terms of SARCCUP be subject to IEUA's readiness to serve charge? If in-lieu supplies can be wheeled through various water systems will wheeling fees be applied (who is responsible for fees)?	The operation of SARCCUP in the Chino Basin will be explained in the PEIR project description.	2.0 Project Description
		4. Will the source of water to be transported through proposed Baseline Feed Extension be raw untreated water intended solely for groundwater recharge or further treatment?	The operation of SARCCUP in the Chino Basin will be explained in the PEIR project description.	2.0 Project Description
		5. What role will IEUA have in habitat restoration and removal of arundo, and if IEUA does have a role then how will they fund it?	The PEIR project description will explain which agency will implement the SARCCUP habitat restoration components and the role of the other partner agencies.	2.0 Project Description
		6. Is IEUA the governing agency of the 5 SARCCUP agencies when determining where and when water will be recharged and extracted within its service area?	IEUA is the lead agencies for the SARCCUP CEQA document. The operational criteria for SARCCUP with respect to when and where water is recharged and extracted will be explained in the PEIR project description.	2.0 Project Description
Pechanga Band of Luiseno Indians [CONFIDENTIAL]				
1/12/17		The Tribe wants to be notified of all environmental review documents and processes associated with SARCCUP.	Will notify Tribe with all SARCCUP environmental documents	N/A
		The PEIR must document the Tribal values of the Santa Ana River, which is the northernmost extent of the Luiseno Traditional Territory and is aboriginal territory and a valuable and significant resource to the Tribe.	The Santa Ana River is a large area and component of the SARCCUP; Tribal values associated with the River will be included in the PEIR	3.5 Cultural Resources and Tribal Cultural Resources
		The Tribe formally requests to meet with IEUA and other appropriate agencies per AB 52. Letter described Ab 52 process.	AB52 process in progress	3.5 Cultural Resources and Tribal Cultural Resources
		<p>The Tribe provides information about cultural resources: Although well documented, the most critical source of information used to define traditional territories are their songs, creation accounts, and oral traditions.</p> <p>The Tribe describes the creation story of their main deity, at Temecula, and ending at Lake Elsinore. The area involves an extensive trail network.</p> <p>The Tribe describes one of the Luiseño songs which recounts a large flood that forced people to spread out and details their settling in destinations, several of which are located near the project area. Specifically, one location is from Rawson Canyon to Lake Matthews, east towards Aguanga.</p>	Comment noted; Supporting information of cultural resources will be included within the cultural and tribal cultural resources sections of the PEIR.	3.5 Cultural Resources and Tribal Cultural Resources

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		<p>The Tribe explains that Rock art and petroglyphs (San Luis Rey style) are an important territorial boundary: many exist in Riverside and San Diego Counties.</p> <p>The Tribe describes cupules or boulders in the shape of mushrooms or waves within the project boundaries.</p> <p>Lastly, the Tribe states that villages, material sites, natural resources, and sacred/ceremonial places exist within the project area.</p>		
		<p>The Tribe says that consultation is critical to determining potential impacts and how they can be avoided or mitigated.</p>	<p>AB52 process in progress</p>	<p>3.5 Cultural Resources and Tribal Cultural Resources</p>
		<p>The tribe may request a project-specific archaeological study with direct participation by a Pechanga Tribal member.</p>	<p>Comment noted. If impacts to archeological resources are potentially significant due to implementation of SARCCUP projects, then an archeological study will be conducted with a Pechanga Tribal member present.</p>	<p>3.5 Cultural Resources and Tribal Cultural Resources</p>
		<p>The Tribe provides steps for inadvertent discovery of resources and discovery of human remains.</p>	<p>Comment noted. This information will be incorporated into potential mitigation measures.</p>	<p>3.5 Cultural Resources and Tribal Cultural Resources</p>
Chino Basin Watermaster (CBWM)				
1/12/17		<p>The PEIR needs to explain agreement between IEUA, MWD, and CBWM that allows MWD to store water in Chino Basin for later extraction with the purpose of increasing DYY.</p>	<p>The PEIR project description will include operational criteria for SARCCUP and will explain the relationship of SARCCUP to Metropolitan's DYY Program.</p>	<p>2.0 Project Description; 3.9 Hydrology and Water Quality</p>
		<p>Would SARCCUP be in addition to or in place of this DYY Agreement?</p>	<p>The PEIR project description will include operational criteria for SARCCUP and will explain the relationship of SARCCUP to Metropolitan's DYY Program.</p>	<p>2.0 Project Description</p>
		<p>CBWM suggests clarification of project objectives that local storage space will be utilized within the parameters of local groundwater management schemes, respecting existing water rights.</p>	<p>Project objectives will support existing agreements, water rights, and current groundwater management documentation</p>	<p>2.0 Project Description</p>
		<p>CBWM states that the approximately 1,000,000 acre-feet of available storage space mentioned in the NOP may not be "usable" space. Storage estimates in the SARCCUP PEIR should be based on documented calculations that reflect individual basins' conditions and management schemes.</p>	<p>The amount of usable storage space will be documented in the PEIR.</p>	<p>2.0 Project Description; 3.9 Hydrology and Water Quality</p>
		<p>CBWM states that is unclear how Santa Ana sucker restoration relates to concurrent Santa Ana River Habitat Conservation Plan being prepared by SBVMWD – the nexus needs to be identified.</p>	<p>The relationship between the SARCCUP habitat restoration and the HCP will be explained in the PEIR</p>	<p>2.0 Project Description</p>
		<p>The PEIR should describe whether or not groundwater will be supplied to the Hidden Valley Drain project mentioned in the NOP. The PEIR should describe what the effects for hydraulic control and the Chino Basin Desalter Authority (CDA) operations will be.</p>	<p>The PEIR will disclose whether groundwater will be supplied to Hidden Valley Drain. The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on</p>	<p>2.0 Project Description; 3.9 Hydrology and Water Quality</p>

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			storage, safe yield and hydraulic control.	
		CBWM suggests including the statement that storage in Chino Basin is subject to rules and regulations regarding the adjudication process; that all storage and recovery applications are subject to MPIA and other rules.	<p>The relationship of SARCCUP to the existing basin adjudication, agreements, rules, and regulations will be included in the PEIR.</p> <p>The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.</p>	2.0 Project Description; 3.9 Hydrology and Water Quality
		CBWM requests including more a precise definition of wet-year in the PEIR; How reasonable is it to have three wet years in a decade (also how reasonable is the 10-year cycle)?	An explanation of the wet year cycle that forms the basis of SARCCUP will be provided in the PEIR.	1.0 Introduction and Background; 2.0 Project Description
		The PEIR needs to identify the existing recharge basins and ASR wells to be used as part of SARCCUP; All recharge in the Chino Basin must be conducted only with the approval of CBWM.	<p>Existing facilities to be used by SARCCUP will be documented in the PEIR.</p> <p>The PEIR will explain the approval process required by Watermasters in all affected groundwater basins, including CBWM, in order for SARCCUP to be implemented and operated.</p>	2.0 Project Description
		<p>CBWM provides this information regarding one-for-one exchange of groundwater for recycled water:</p> <ol style="list-style-type: none"> 1. Water quality of groundwater pumped will likely be poorer than recycled water discharged to the River and regulatory implications of this discharge may not be consistent with the maximum benefit commitments in the Basin Plan; 2. One-for-one exchange might affect the Basin's Safe-Yield; 3. The amount of groundwater production could interfere with CDA production and operations. 	<p>The PEIR will include a description of existing water quality in the river and groundwater basins and an analysis of impacts to water quality and beneficial uses due to SARCCUP implementation, including the use of recycled water.</p> <p>The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.</p>	3.9 Hydrology and Water Quality
		<p>CBWM states that the conjunctive use program in the Chino Basin will require analysis of: safe yield, land subsidence, maximum benefit commitments, and water quality.</p> <p>CBWM states that IEUA would need to apply on behalf of SARCCUP to CBWM for a Storage and Recovery Program, following which CBWM would conduct an analysis including MPI, HC, and water quality. The PEIR should include analyses that will facilitate CBWM's review of the application.</p>	<p>The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.</p> <p>SARCCUP would not contribute to existing land subsidence because it is a groundwater banking project. Water is recharged before it is extracted. This will be explained in the PEIR.</p>	3.9 Hydrology and Water Quality; 3.X Geology, Soils, and Seismicity
		The PEIR should include analysis of potential impacts on existing private agricultural wells in the Chino/IEUA south zone.	The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control. SARCCUP is not expected to affect existing wells because it	3.9 Hydrology and Water Quality

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			is a groundwater banking project such that water is recharged before it is extracted.	
Chino Basin Desalter Authority (CDA)				
1/12/17	Chino Basin Desalter Authority (CDA)	The CDA requests that the potential and anticipated impacts to CDA wells in the Chino/IEUA South zone, and any proposed mitigation measures, be described both qualitatively and quantitatively in the PEIR. The CDA will be operating a total of thirty (30) wells in this zone within the next few years.	The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control. SARCCUP is not expected to affect existing wells because it is a groundwater banking project such that water is recharged before it is extracted. If needed, the PEIR will include mitigation measures outlining the procedures to be followed when projects are implemented to avoid or lessen potentially significant impacts. Mitigation measures will include performance criteria as necessary to ensure mitigation is not being deferred.	3.9 Hydrology and Water Quality
United States Department of the Interior, Fish and Wildlife Service (USFWS)				
1/12/17	United States Department of the Interior, Fish and Wildlife Service (USFWS)	USFWS suggests the PEIR be explicit about the use of local surface water, including recycled, or storm flows, as opposed to imported water, for recharge in the PEIR, and analyze impacts to downstream natural resources.	The PEIR will evaluate impacts associated with recharge of imported water and recycled water, including impacts to natural resources.	3.4 Biological Resources, 3.9 Hydrology and Water Quality
		The effects to water dependent resources at the imported water point of origin should also be disclosed and discussed in the PEIR.	Wildlife species dependent on Santa Ana River and supporting tributary flows will be discussed within the PEIR	3.4 Biological Resources
		USFWS requests that the PEIR provide mitigation measures for effects to natural resources, as appropriate.	Mitigation Measures will be provided to lessen potential impacts to biological resources	3.4 Biological Resources
		If use of local surface or recycled water is proposed, a regional hydrologic model should be created to simulate interactions between surface and groundwater supplies.	The PEIR will describe the how SARCCUP will be operated within existing constraints and limitations on storage, safe yield and hydraulic control.	3.4 Biological Resources; 3.9 Hydrology and Water Quality
		The extraction of water that effects listed species or the function of their habitat must be analyzed to determine the impacts to those species and their habitats (positive or negative) and the potential for incidental take, whether it is surface or groundwater, and no matter the originating source (local or imported).	SARCCUP is not expected to affect HC or safe yield; SARCCUP is a groundwater banking project such that water will be recharge prior to extraction. SARCCUP will not result in the loss of surface water to groundwater. As such, SARCCUP is not expected to have adverse impacts to existing habitat and flow conditions. Therefore, a regional hydrological surface-groundwater interaction model is not necessary.	
		A regional, integrated surface-groundwater model would provide the means to make informed decisions on how these proposed projects could cumulatively affect listed species.		
		USFWS support the removal or arundo and measures	The PEIR will specifically	3.4 Biological

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		to support the Santa Ana sucker. The PEIR should be clear on the relationship, if any, between those efforts and project-related impacts to the fish or other sensitive resources.	analyze impacts to the Santa Ana Sucker and other sensitive resources that may be impacted by project implementation.	Resources