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

OCT 23 2014

David Woolley
Bureau of Reclamation
U.S. Department of the Interior
1243 N. Street, SCC-431
Fresno, California 93721

Subject: Final Resource Management Plan and Environmental Impact Statement for Contra Loma Reservoir and Recreation Area, Contra Costa County, California (CEQ# 20140279)

Dear Mr. Woolley:

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

The EPA supports the development of a comprehensive RMP to guide future resource management actions, and commends the efforts by the Bureau of Reclamation to address key issues such as (1) the increasing demand for use of the trail system, swimming lagoon, and recreational facilities, and (2) protection of the water supply and quality of the reservoir. We support current programs at Contra Loma that the RMP/EIS indicates will continue, including body contact restrictions on reservoir use, litter and waste reduction programs, continued prevention of zebra and quagga mussel infestation, and prohibitions on public use of gasoline-powered engines on the reservoir.

The EPA reviewed the Draft EIS and provided comments to Reclamation on July 1, 2014. We rated the Draft EIS as *Environmental Concerns– Insufficient Information* (EC-2), primarily due to concerns regarding potential impacts to air, water and biological resources from proposed recreation enhancements and construction activities. Our comments identified the need for additional information regarding these resources and provided recommendations to reduce potential impacts. The Final EIS resolves some, but not all, of our concerns.

We appreciate Reclamation's efforts to respond to our Draft EIS comments, and we were pleased to note additional analyses and mitigations that support environmentally preferable outcomes. In particular, we commend the addition of fugitive dust and emission control measures (MM AQ-1), measures to reduce greenhouse gas emissions (MM AQ-2), and provisions to minimize habitat fragmentation, including efforts to cluster new or expanded facilities in close proximity to existing facilities. The Final EIS also quantifies the potential impact to wetlands that could result from the proposed seasonal drawdown of the reservoir and commits to compliance with Clean Water Act Section 404(b)(1) Guidelines in subsequent project-level analyses. In addition, we were pleased to see a more robust discussion of climate change in California and potential effects on the future ecosystem conditions in the planning area.

Notwithstanding these and other improvements in the Final EIS, we have a few remaining concerns regarding air quality mitigation measures, herbicide use, and water quality. Appendix G - Responses to

Comments - indicates that "the EPA-recommended measures were incorporated into MM AQ-1 and MM AQ-2" (p. 14). While we note MM AQ-1 includes the Bay Area Air Quality Management District's mitigation measures, Section 4.12.7 does not integrate the additional measures we recommended for consideration in our Draft EIS comment letter (e.g. commitment to the best available emissions control technology for project construction equipment). Given Contra Costa County's non-attainment status for federal 8-hour ozone and particulate matter (less than 2.5 micrometers), all feasible measures should be implemented to reduce air quality impacts to the greatest extent practicable. We recommend that the Record of Decision incorporate, as part of MM AQ-1, our previous recommendations for mitigating impacts to air quality from future construction projects.

We also note that the response to the EPA's comments (Appendix G, p. 21) indicates that Sections 3.1.1, 4.8.4, 4.9.8 and 4.10.3 were modified to identify the health and environmental impacts associated with exposure to herbicides, commit to specific best practices for herbicide use, and provide alternatives to herbicide use. Those sections in the Final EIS do not reflect these changes. We recommend that the ROD include the intended modifications and update Management Action 19 to ensure these provisions are incorporated into subsequent pesticide management plans.

In light of total coliform levels in the reservoir often exceeding standards, we previously requested clarification of whether MA-51 would permit grazing livestock on approximately 3 acres of grassland immediately adjacent to the reservoir, and whether potential impacts to water quality in the reservoir may result. The response to our comment states that proposed changes to grazing areas would not be located within the reservoir's watershed, so grazing in those areas would not affect reservoir water quality (Appendix G, p. 15). As the nearest boundary of the proposed parcel is approximately 100 feet from the reservoir, we recommend that the ROD update MA-51 to specify the requisite buffer distance (i.e. between the reservoir and the proposed grazing activity) to protect water quality, and include a monitoring plan to ensure that the reservoir's water quality is not affected.

Lastly, given the programmatic nature of this RMP/EIS, we were pleased to note that the Final EIS clarifies commitments to future project-level analyses for general conformity, compliance with Clean Water Act Section 404(b)(1) Guidelines, and impacts to water quality due to construction activities. We also note that Reclamation plans to solicit input from the US Fish and Wildlife Service and the California Department of Fish and Wildlife on specific measures to achieve no or minor impacts to special status wildlife species or their habitat. We recommend that the ROD include a firm commitment to these project-specific NEPA analyses and agency consultations.

The EPA appreciates the opportunity to review this Final EIS. If you have any questions, please contact Tom Plenys, the lead reviewer for this project, at 415-972-3238 or plenys.thomas@epa.gov.

Sincerely,

Kathleen Martyn Goforth
Manager
Environmental Review Section