UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

April 28, 2008

Mr. Bradley Hubbard
Bureau of Reclamation
Division of Resources Management
2800 Cottage Way
Sacramento, CA. 95825

Subject: Draft Environmental Impact Statement (DEIS) American Basin Fish Screen and Habitat Replacement Project, Sacramento and Sutter Counties, CA (CEQ# 20080074)

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.

We have rated the DEIS as Lack of Objections (LO) (see enclosed "*Summary of Rating Definitions*"). The proposed action would consolidate five existing unscreened water diversions into two new screened water diversions, remove fish barriers and facilities from the Natomas Cross Canal, and improve Natomas Basin water conveyance canals. As a result, there would be a reduction in adverse effects on anadromous fish, improvement of a migration corridor to additional fish habitat, enhanced flood conveyance capacity in the Natomas Cross Canal, and increased riparian and giant garter snake habitat. While the DEIS does not appear to identify a Preferred Alternative, we note that the American Basin Fish Screen Proposed Action would have the least adverse effects on sensitive fish habitat, mature trees, and Swainson's hawk foraging habitat.

As a party to CALFED, EPA supports the goals of the project. We have a few suggestions to maximize resource conservation in the context of the proposed demolition and construction of facilities. We recommend maximizing the salvage, recycling, and reuse of demolition waste and use of materials with recycled content. In addition, in the interest of full disclosure, we recommend the final environmental impact statement (FEIS) include a table comparing alternative canal modifications, clearly demonstrate that the overall canal design changes would not increase overall system capacity and diversion rates, provide updated information on Sacramento River fisheries, and describe how interim pumping design limits would be achieved. These suggestions are described further in our enclosed detailed comments.

We commend the Bureau of Reclamation, California Department of Fish and Game, and Natomas Central Mutual Water Company (Natomas Mutual) for your efforts to improve conditions for anadromous fish and the giant garter snake while ensuring continued water supply reliability for Natomas Mutual. We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and one CD ROM to the address above (mail code: CED-2). If you have any questions, please contact me at (415) 972-3846 or Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or fujii.laura@epa.gov.

Sincerely,

Laura Fujii for

Nova Blazej, Manager
Environmental Review Office

Enclosure:
Summary of EPA Rating Definitions
Detailed Comments

cc: Mr. James Navicky, California Dept. of Fish and Game

EPA DETAILED DEIS COMMENTS AMERICAN BASIN FISH SCREEN & HABITAT IMPROVEMENT PROJECT, SACRAMENTO & SUTTER COUNTIES, CA, APRIL 28, 2008

Pollution Prevention

Salvage, recycle, and reuse demolition waste. Use materials with recycled content. The action alternatives include decommissioning and dismantling the five existing water diversion plants. These plants would be replaced with two new screened diversion plants. Modifications to existing irrigation and drainage canals would also take place in order to ensure the same level of water service from the two new diversions.

> ***Recommendation:***
> Maximize resource conservation and pollution prevention in accordance with Executive Order 13148 Greening the Government Through Leadership in Environmental Management. We recommend the project design include the salvage, recycling, and reuse of the demolition waste. We also recommend new construction maximize the use of materials with recycled content. The following websites provide useful information on pollution prevention, green building, and waste recycling:
> http://www.epa.gov/region09/waste/p2/business.html
> http://www.epa.gov/opptintr/p2home/index.htm
> http://www.epa.gov/epaoswer/osw/pubs/recycling.htm
> http://www.epa.gov/osw/infoserv.htm#other

Full Disclosure

Include a comparative table of canal modifications. Demonstrate that canal design changes would not increase overall system capacity and diversion rates. The consolidation of five diversion plants to two would require changes in the distribution canals in order to mitigate for the effects on supply response time that would occur as a result of moving the water supplies further from the demands (e.g., rice fields) (p. 2-39). The draft environmental impact statement (DEIS) describes the various canal modifications and states that the modified canal system capacity would be sized to replace and maintain existing peak service conveyance capacity (p. 2-37). Based on this description it is difficult to compare alternatives or to verify that the proposed canal modifications maintain, versus increase, existing conveyance capacity. The potential expansion of the existing water conveyance system and possible induced growth is of concern especially given the significant pressure for urban growth in the Natomas Basin.

> ***Recommendation:***
> We recommend the final environmental impact statement (FEIS) include a comparative table of the proposed canal modifications by alternative. We recommend this table include information on design features that change flow rates and conveyance capacity compared to existing conditions. A clear explanation for the changes should be included, plus verification that the changes do not increase the overall system capacity and diversion rate beyond the existing conditions.

Provide updated fish information. In recent months there have been significant changes in the existing conditions and population status of Sacramento River fisheries. For instance, a recent decision by Federal regulators canceled the 2008 salmon fishing season due to a sharp decline in the Sacramento River's fall-run chinook salmon.

> ***Recommendation:***
> In the interest of full disclosure of the environmental context for the proposed project, we recommend the FEIS include updated information regarding the existing and projected conditions and population status of Sacramento River fisheries. We recommend including a short discussion of the potential implications of current events on the project.

Provide an estimate of costs and benefit/cost ratios by alternative. The DEIS states that funding will be provided from the Central Valley Project Improvement Act Restoration Fund, California Proposition 204, and the CALFED Ecosystem Restoration Program Plan (p. S-1). Projected costs, costs by component (e.g., diversion plants, canal modifications), and benefit/cost (b/c) ratios are not provided.

> ***Recommendation:***
> We recommend the FEIS include a table of the costs and b/c ratios of the alternatives.

Describe how interim pumping design limits would be achieved. Phase I of the American Basin Fish Screen Proposed Action would replace 2 existing diversion plants with one. The three remaining diversions would continue to operate until completion of Phase II and III. Thus, Phase I includes design limits to control pumping so that it would not exceed the existing diversion capacity of 630 cubic feet per second during the interim period when the new Sankey Diversion is operating in conjunction with the remaining existing diversions (p. 2-17).

> ***Recommendation:***
> We recommend the FEIS describe how the pumping design limits would be achieved until Phase II and III are complete.