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

JUL 18 2013

Amy Witherall
SCAO-7300
Bureau of Reclamation
Southern California Area Office
27708 Jefferson Avenue, Suite 202
Temecula, CA 92590

Subject: Final Environmental Impact Statement for the Riverside-Corona Feeder Project, Bunker Hill Groundwater Basin, San Bernardino and Riverside Counties, California (CEQ #20130171)

Dear Ms. Witherall:

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

EPA reviewed the Draft Environmental Impact Statement and provided comments to the Bureau of Reclamation on April 5, 2011. We rated the Preferred Alternative - Realignment Alternative with Additional Connections - as *Environmental Concerns – Insufficient Information* (EC-2). Our rating was primarily based on potential direct and cumulative effects on groundwater quality, and concerns regarding the proponent's ability to ensure that replenishment and extraction of water from 20 new production wells does not result in adverse effects on drinking water supplies or on the remediation and management of contaminated groundwater plumes.

EPA appreciates the efforts of BOR, the Western Municipal Water District (Western), and its consultants to discuss and respond to our DEIS comments. We continue to support local and regional efforts to enhance water supply reliability, provided proposed actions are consistent with a balanced water supply and demand strategy, based upon a reliable developed water supply, and do not adversely affect the environment or third party beneficial uses.

We note a number of changes that were made in the FEIS to address our concerns. In particular, we were pleased to see: clarification throughout the FEIS that the project is designed to transport "potable" water and that water produced from any new or existing wells will be "treated" to meet drinking water standards; revisions to MM GW-2 to clarify how new or existing wells will be monitored and to identify priority treatment methods to be used should they become contaminated; additional information on the horizontal and vertical characterization of the pollution plumes and their relative spatial relationship to the cones of depression of the proposed

extraction wells; additional details on the current monitoring, accounting and management procedures used in the Bunker Hill Groundwater Basin; and a detailed discussion of Western's ongoing efforts to achieve sustainable water management. We also appreciate Western's and BOR's commitment to work with EPA to encourage local and regional efforts to enhance water supply reliability through sustainable water supply management.

While recognizing these improvements, to help ensure adequate and timely treatment of extracted groundwater, we recommend that the Record of Decision include a commitment that all future water supply permitting requests will identify appropriate "sentinel" monitoring well locations for each new production well that would allow sufficient time to prepare and implement necessary treatment should potential draw to contaminated plumes be detected. Additionally, to ensure in-depth water quality analyses are conducted in the future, we recommend that the ROD include a commitment to analyze whether recharging, with imported water, portions of an aquifer formerly occupied by contaminated plumes results in contamination by residual volatile organic compounds (VOC), perchlorate, trichloroethylene (TCE), or other contaminants. The commitment should identify appropriate remedies, and the timeframe for action, should such contamination occur.

We recommend that all mitigation measures, including specific criteria for assessing the success of mitigation, be adopted in the ROD and included as conditions in future permits and any other approvals, as appropriate, to minimize adverse environmental impacts to the extent possible. If any mitigation measures in the FEIS are not adopted, the ROD should explain the basis for the decision not to adopt them.

EPA appreciates the opportunity to review this FEIS and provide comments on this project. We are available to discuss all recommendations provided. When the ROD is signed, please send one copy to the address above (mail code CED-2). If you have any questions, please contact me at 415-972-3521, or contact Tom Plenys, the lead reviewer for this FEIS. Tom can be reached at 415-972-3238 or plenys.thomas@epa.gov.

Sincerely,

Kathleen Martyn Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Cc: Jack Safely, Western Municipal Water District
Matthew H. Litchfield, City of San Bernardino Municipal Water District