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

November 28, 2011

Myrnie Mayville
Bureau of Reclamation
2800 Cottage Way, Room E-2606
Sacramento, CA 95825

Subject: Final Environmental Impact Statement for Upper Truckee River Restoration and Golf Course Reconfiguration Project, El Dorado County, California [CEQ #20110348].

Dear Ms. Mayville:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Upper Truckee River Restoration and Golf Course Reconfiguration Project (Project). Our comments are provided 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.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for the Project and provided comments to the Bureau of Reclamation on November 01, 2010. We rated the document EC-2, Environmental Concerns – Insufficient Information based on potential impacts to water quality, floodplains, riparian habitat, surface and groundwater, irrigation system runoff, water usage and existing impaired ecological conditions. In addition, we stated concerns regarding mitigation and monitoring measures during and after construction. Based on our review of the FEIS, our concerns regarding the significant environmental impacts identified in our comments on the DEIS remain unresolved.

The Project monitoring program should include water quality sampling of flood flows and/or other forms of monitoring (e.g., cross-section surveys, ideally employing LiDAR techniques) on the floodplain. The goal being to determine the degree of deposition or entrapment of fine sediment particles regulated by the Lake Tahoe TMDL (i.e., sub-16 µm diameter particles), resulting from overbank flooding. This monitoring should be in addition to monitoring conducted to confirm pollutant load reductions required by the TMDL's load allocation for stream channel erosion,[1] and should attempt to quantify the project's water quality benefits beyond the TMDL load allocation. Such monitoring would benefit tracking TMDL implementation and would potentially provide incentives to conduct additional floodplain restoration/reconnection projects elsewhere in Lake Tahoe Basin.

Section 1.1.3 of the FEIS suggests that the Project may require a Clean Water Act Section 404 permit from the United States Army Corps of Engineers. If required, we recommend the practicability analysis include the estimated cost of the golf course restoration verses decommissioning when determining the Least Environmentally Damaging Practicable Alternative.

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[1] http://www.swrcb.ca.gov/rwqcb6/water_issues/programs/tmdl/lake_tahoe/docs/tmdl_rpt_nov2010.pdf. (p. 10-4; p. 71 of PDF, Tables 10-1 - 10-3)

We appreciate the opportunity to review this FEIS. If you have any questions, please contact me at (415) 972-3521, or contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3800 or munson.james@epa.gov.

Sincerely,

/s/

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

Cc: Douglas Kleinsmith, Bureau of Reclamation
Cyndie Walchk, California State Parks
Brian Judge, Lake Tahoe Environmental Improvement Program