

US EPA ARCHIVE DOCUMENT



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

March 11, 2013

Mr. Brad Hubbard  
Bureau of Reclamation  
2800 Cottage Way, MP-410  
Sacramento, CA 95825

Subject: Final Environmental Impact Statement (EIS) for the Water Transfer Program for the San Joaquin River Exchange Contractors Water Authority 2014-2038 (CEQ#20130023)

Dear Mr. Hubbard:

The 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 Section 309 of the Clean Air Act.

EPA reviewed the Draft EIS and rated it as Environmental Concerns - Insufficient Information (EC-2) in our letter dated July 2, 2012. We expressed concerns regarding impacts to distribution, timing, and quality of water in the San Joaquin Basin. We recognize and appreciate the additional explanation of groundwater impacts in the Response to Comments, as well as the description of other actions that the Exchange Contractors have taken to manage their agricultural drainage water.

We have continuing concerns regarding the cumulative impacts of past and present water transfer programs; however, we recognize that improving water quality and flows along the San Joaquin River system is a complex problem. The Final EIS concludes that tailwater recapture will reduce salt loading to the River, contributing to an overall water quality improvement. While EPA supports tailwater recovery, we note that the larger problem of managing salt balance in the basin remains, since withholding tailwater from the River does not remove salts from the watershed. EPA is concerned that salts in evaporation ponds for tailwater can still be mobilized and reach the river during extreme weather events. We encourage Reclamation to continue to explore ways to prevent salts from reaching the river.

As described in the Response to Comments, shifts in the timing and intensity of water use, improved conjunctive use of surface and ground water, improved coordination and routing of existing supplies, and water conservation are all available solutions for improving San Joaquin River flows and quality. Other actions, which the Exchange Contractors have taken and might expect to take to manage their agricultural drainage water, were not included as part of this EIS. Given that one such action -- land fallowing -- is a source of transfer water, we encourage Reclamation to explore ways in which fallowing could be encouraged in areas with the greatest concentrations of salt and selenium, as well as areas near the San Joaquin River where the direct and indirect effects of San Joaquin River flows, such as an increase in shallow groundwater, have conflicted with farming practices.

EPA appreciates the opportunity to provide comments for this project. If you have any questions, please contact me at (415) 972-3521 or contact Stephanie Skophammer, the lead reviewer for this project. Stephanie can be reached at (415) 972- 3098 or Skophammer.stephanie@epa.gov.

Sincerely,

/s/

Kathleen Martyn Goforth, Manager  
Environmental Review Office (CED-2)  
Communities and Ecosystems Division

cc: Dan Russell, US Fish and Wildlife Service  
Joy Winckel, San Joaquin River Exchange Contractors Water Authority  
Rudy Schnagl, Central Valley Regional Water Quality Control Board  
Joann White, San Joaquin River Exchange Contractors Water Authority