



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

August 6, 2009

David White
Mid-Pacific Region
Bureau of Reclamation
2800 Cottage Way
MP-730, Room W-2830
Sacramento, CA 95825-1898

Subject: Draft Environmental Impact Statement for North San Pablo Bay
Restoration and Reuse Project (North Bay Water Recycling Program),
Sonoma, Marin, and Napa Counties, California (CEQ# 20090178)

Dear Mr. White:

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. Our comments are provided in accordance with our June 5, 2009 agreement that EPA provide our comments no later than August 7, 2009. We appreciate the additional time to conduct our review.

EPA supports the project purpose to expand beneficial use of recycled water for agriculture, urban, and environmental uses in the North Bay region. Efficient and sustainable water use is vital in meeting the challenges of long-term drought, climate change, continuing population growth, and the collapse of the Bay-Delta ecosystem. We commend the North Bay Water Reuse Authority cooperative program and its support of sustainability and environmental enhancement through the expanded use of recycled water.

Potable water would be made available through the expanded use of recycled water for agricultural and landscape irrigation and wetland restoration. We encourage the use of this potable water to increase the reliability of water supplies for existing and in-fill development and existing and/or designated beneficial uses, prior to its use for new development.

We also urge the North Bay Water Reuse Authority and its Member Agencies to support ongoing research on the human and biological toxicology of microconstituents and emerging contaminants that may be present in recycled water. Potential avenues of support include collaboration with the State Water Resources Control Board on data collection; monitoring of recycled water use and its human, ecological, and biological

effects; and public education programs regarding proper disposal of pharmaceuticals and household products.

Our review has not identified potential environmental impacts requiring substantive changes to the proposal. We recommend the FEIS include a clear commitment to additional project-level environmental review for new storage reservoirs and subsequent project phases once site-specific project design alternatives are determined.

In light of the above comments, we have rated the DEIS as Lack of Objections (LO) (see enclosed "*Summary of Rating Definitions*"). 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) 972-3521, or contact Laura Fujii, the lead reviewer for this project. Laura can be reached at (415) 972-3852 or fujii.laura@epa.gov.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosure: Summary of Rating Definitions

cc: Marc Bautista, Sonoma County Water Agency
Ken Harris, Regulatory Section, State Water Resources Control Board
William Hurley, Watershed Management Division, San Francisco
Regional Water Quality Control Board
Susan K. Moore, US Fish and Wildlife Service
Charles Armor, Bay Delta Region, California Department of Fish and Game