



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

September 7, 2006

James Reynolds, Superintendent
Death Valley National Park
Death Valley, CA 92328

Subject: Final Environmental Impact Statement (EIS) for Reconstruction of the Furnace Creek Water Collection System, Death Valley National Park [CEQ #20060281]

Dear Mr. Reynolds:

The U.S. Environmental Protection Agency (EPA) has reviewed the above referenced document. Our review and comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementation Regulations at 40 CFR 1500-1508, and Section 309 of the Clean Air Act.

In our December 12, 2005, comment letter on the Draft EIS for the Furnace Creek project, we expressed concerns regarding the National Park Service's (NPS) proposal to discharge drinking water treatment residuals from the reverse osmosis plant into the Furnace Creek Wash alluvium. We recommended that the Final EIS provide additional information on this issue.

The Final EIS (p. II-27) states that the reverse osmosis residuals "would either be conveyed into the park's sewage treatment system for evaporation, blended with water collected from the Furnace Creek Collection Gallery for nonpotable use, or transported to Furnace Creek Wash and discharged into a percolation trench for groundwater recharge." However, based on our August 31, 2006, conference call with Linda Greene of Death Valley National Park and other NPS staff and contractors, we understand that NPS has recently decided not to pursue its proposal to discharge the reverse osmosis residuals into the Furnace Creek Wash alluvium. NPS's current preferred alternative is to convey the reverse osmosis residuals via pipeline to the golf course pond where it would be blended with other nonpotable water and then used by Xanterra to irrigate its resort facilities. We understand that if Xanterra determines that the blended water does not meet its irrigation water quality criteria, the residuals would be piped instead to the park's sewage treatment system for evaporation. NPS and Xanterra may also wish to explore the possibility of piping some water to the pond and some water to the sewage treatment plant.

Since NPS has eliminated the option to discharge drinking water treatment residuals into percolation trenches or otherwise discharge them below ground surface, then the questions in our Draft EIS comments regarding the reverse osmosis plant and

applicability of the federal Underground Injection Control regulations to that discharge are no longer relevant. However, State water quality regulations may apply to NPS's new preferred alternative. We recommend you contact the Lahontan Regional Water Quality Control Board so they may advise you regarding this option. Any reconsideration of the percolation trench option should involve discussion with EPA.

The Record of Decision (ROD) should clearly describe the fate of the reverse osmosis residuals. If some or all of this water will go to the golf course pond for irrigation use, the ROD should: (1) indicate how much water will be piped to the pond; (2) include the projected constituent concentrations of the blended water; (3) discuss permitting or other regulations that apply to the discharge; (4) describe the potential impacts to all affected resources; and (5) identify all measures needed to mitigate adverse impacts. If some or all of this water will go to the sewage treatment system, the ROD should: (1) indicate how much water will be piped to the sewage treatment system; (2) discuss potential impacts to all affected resources; and (3) identify all measures needed to mitigate adverse impacts.

We appreciate the opportunity to review this Final EIS and request a copy of the ROD when it becomes available. If you have any questions, please call me at (415) 972-3988, or have your staff call Jeanne Geselbracht at (415) 972-3853.

Sincerely,

/s/

Duane James, Manager
Environmental Review Office

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cc: Cyndi Mitton, California Regional Water Quality Control Board, Lahontan Region – Victorville Office