



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

January 27, 2006

Dr. Nedenia Kennedy
U.S. Army Corps of Engineers
Los Angeles District
ATTN: CESPL-PD-RQ
P.O. Box 532711
Los Angeles, CA 90053

Subject: Draft Environmental Impact Statement (DEIS) for the Prado Dam Basin, Riverside and San Bernardino Counties, California (CEQ# 50531)

Dear Dr. Kennedy:

The Environmental Protection Agency (EPA) has reviewed the DEIS referenced above. Our review is 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.

We recognize the need to update the Prado Flood Control Basin Master Plan (Master Plan), previously completed in 1976. We have some concerns with the proposed plan and request that additional clarifications be made in the FEIS. For this reason, we have rated the document as Environmental Concerns - Insufficient Information (EC-2) (see enclosed "Summary of Rating Definitions"). For example, the information in the Master Plan relies on species surveys from 1998 and 1999. The FEIS should clarify if more recent surveys are being completed and how these will be incorporated into the overall plans for the area. The analysis includes an Extreme Resource Area, an area established by the U.S. Fish and Wildlife Service which contains the vast majority of the riparian woodlands and habitat for the federal and state endangered least Bell's vireo, and the federal endangered southwestern willow flycatcher. We note that the document uses a 300-foot buffer between development areas and the Extreme Resource Area to determine the potential for impacts. The FEIS should clarify why this buffer distance has been used.

The FEIS should include a description of the air quality in the project area. The DEIS estimates that the project will have long and short-term air quality impacts to this area as well as substantial adverse traffic impacts (p. 6-25). As transportation improvements will most likely be needed (p. 6-25), compliance with the General Conformity requirements of the CAA

(§176(c)(1)) will be required for these future proposals. The General Conformity requirement mandates that the Federal government not license, permit, or approve any activity not conforming to an approved CAA implementation plan.

In addition, the document notes that water use impacts could be minimized if the Western Municipal Water District is provided the opportunity to evaluate the needs of the Master Plan and take these needs into account for future plans (p. 6-11). The FEIS should clarify how this coordination will take place. We also note that while many of the planning areas do not have specific plans assigned for future use, a few of the planning areas, such as Planning Area SB-5 and C-8, have water parks planned. It is unclear whether this assignment in the Master Plan will restrict the range of alternatives analyzed in the project-specific NEPA document. The FEIS should clarify how the range of alternatives for each planning area will be determined.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send (2) copies to the address above (mailcode: CED-2). If you have any questions, please contact me at 415-972-3988 or Summer Allen, the lead reviewer for this project. Summer can be reached at 415-972-3847.

Sincerely,

/S/

Duane James, Manager
Environmental Review Office

Main ID # 4752

Enclosures: Summary of Rating Definitions

