



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

February 26, 2007

R. Phipps
Shasta-Trinity National Forest
3644 Avtech Parkway
Redding, CA 96002

Subject: Draft Environmental Impact Statement (DEIS) for the Turntable Bay Marina Master Development Plan (CEQ# 70001)

Dear Mr. Phipps:

The U.S. Environmental Protection Agency (EPA) has reviewed the document referenced above. 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.

The Shasta-Trinity National Forest (STNF) is proposing to relocate the Digger Bay Marina to Turntable Bay on Shasta Lake. The purpose of the project is to improve the quality of the marina facilities and services. The STNF manages the Shasta Unit of the Whiskeytown-Shasta-Trinity National Recreation Area (NRA) and has identified Turntable Bay as the most feasible location for a new marina to better accommodate fluctuating water levels in the 1996 NRA Management Guide.

EPA rates the Preferred Alternative as Lack of Objections (LO) (see enclosed *Summary of EPA Rating Definitions*). Although there is additional information we would like to see in the Final EIS (FEIS), implementation of the preferred alternative (Alternative 3) with mitigation, should not result in significant environmental impacts. Alternative 3 incorporates reduced grading activities in areas with concentrations of nesting/roosting habitat for bald eagles and osprey when compared to Alternative 2. Alternative 3 also increases the vegetative buffer around the lake and reduces degradation of soil quality and erosion.

However, the DEIS does not describe how the project goals were formulated (for example, the number and size of parking lots needed to meet the project objectives). While this information may be included in the 1986 Environmental Assessment, it should be summarized in the FEIS to justify the amount of construction needed. Under the proposed project, grading

associated with development of roads and parking areas would result in impacts to 2.18 to 2.21 acres of Waters of the U.S. Therefore, this NEPA document will also serve to meet Clean Water Act Section 404(b)(1) requirements. The FEIS should ensure that impacts to Waters of the U.S. have been reduced to the lowest amount possible. The Clean Water Act Section 404 permit requires that the Least Environmentally Damaging Practicable Alternatives (LEDPA) be selected. Additionally, the DEIS notes that compensatory mitigation for direct impacts to jurisdictional waters shall be achieved through habitat improvement on Shasta Lake. Once these measures are determined, they should be included in the FEIS.

Short-term increases in turbidity in Shasta Lake could violate the Water Quality Control Basin Plan for the Sacramento River and San Joaquin River Basins (Basin Plan). Therefore, we support the adoption of the reduced grading associated with Alternative 3 and the regular monitoring of Shasta Lake for elevated turbidity. The DEIS notes that after project implementation, public access to Digger Bay will be restricted until the STNF determines the dispensation of these facilities (p.1-7). Any future decisions regarding activities at Digger Bay that could result in sedimentation in Shasta Lake should be reviewed cumulatively with the activities at the Turntable Bay Marina.

In addition, while the STNF is in compliance with all national ambient air quality standards, the portion of the STNF where construction is proposed exceeds the California ambient air quality standard for particulate matter less than 10 microns in diameter (PM10). Table 3.11-4 notes that the construction activities associated with the project could result in significant increases in fugitive dust and associated particulate matter. Therefore, EPA is supportive of the minimization measures outlined on page 3.11-9. The FEIS should evaluate the possibility of completing the major construction of the marina at a time when fuel reduction projects in the STNF are not being undertaken.

We appreciate the opportunity to review this DEIS. When the FEIS is released, please send one copy to address above. If you have any questions, please contact me at 415-972-3876 or Summer Allen, the lead reviewer for this project. Summer can be reached at 415-972-3847 or allen.summer@epa.gov.

Sincerely,

/S/ Summer Allen for

Nova Blazej, Manager
Environmental Review Office

Enclosed: Summary of EPA Rating Definitions
Main ID # 4634