California Regional Water Quality Control Board

Los Angeles Region

Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

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CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REQUIREMENTS

The California Regional Water Quality Control Board, Los Angeles Region (hereinafter referred to as the Regional Board) is the Lead Agency for evaluating the environmental impacts of the proposed amendment to the *Water Quality Control Plan for the Los Angeles Region* (Basin Plan). The proposed amendment incorporates a Total Maximum Daily Load (TMDL) for toxicity, chlorpyrifos and diazinon and siltation in Calleguas Creek, its tributaries, and Mugu Lagoon. The Secretary of Resources has certified the basin planning process as exempt from certain requirements of the California Environmental Quality Act (CEQA), including preparation of an initial study, negative declaration, and environmental impact report (California Code of Regulations, Title 14, Section 15251(g)). As the proposed amendment to the Basin Plan is part of the basin planning process, the environmental information developed for and included with the amendment is considered a substitute to an initial study, negative declaration, and/or environmental impact report.

The "certified regulatory program" of the Regional Board, however, must satisfy the documentation requirements of California Code of Regulations, Title 23, Section 3777(a) which requires the following:

- A written report providing:
  - a description of the proposed activity;
  - reasonable alternatives to the proposed activity; and
  - mitigation measures to minimize any significant adverse impacts.
- A completed environmental checklist as approved by the Resources Agency

The attached checklist, the technical reports for the TMDL for toxicity and the pesticides chlorpyrifos and diazinon in Calleguas Creek, its tributaries, and Mugu Lagoon and responses to comments prepared by staff fulfill the requirements of Section 3777, Subdivision (a). In preparing these CEQA substitute documents, the Regional Board has considered the requirements of Public Resources Code section 21159 and California Code of Regulations, title 14, section 15187, and intends these documents to serve as a tier 1 environmental review.

Any potential environmental impacts associated with the TMDL depend upon the specific compliance projects selected by dischargers, many of whom are public agencies with their own CEQA obligations. (See Pub. Res. Code § 21159.2.) If not properly mitigated at the project level, there could be adverse environmental impacts. The CEQA substitute documents identify broad mitigation approaches that should be considered at the project level. Consistent with CEQA, the substitute documents do not engage in speculation or conjecture and only consider the reasonably foreseeable environmental impacts of the methods of compliance, the reasonably foreseeable feasible mitigation measures, and the reasonably foreseeable alternative means of compliance, which would avoid, eliminate, or reduce the identified impacts. The Regional Board recognizes that there may be project-level impacts that the local public agencies may determine are not feasible to mitigate. To the extent the alternatives, mitigation measures, or both, are not deemed feasible by those agencies, the necessity of implementing the federally required toxicity, chlorpyrifos and diazinon TMDL and removing the related impairments from Calleguas

Creek, its tributaries, and Mugu Lagoon (an action required to achieve the express, national policy of the Clean Water Act) outweigh the unavoidable adverse environmental effects

I. DESCRIPTION OF PROPOSED ACTIVITY

The Water Quality Control Plan for the Los Angeles Region (also know as a Basin Plan) designates beneficial uses of waterbodies, establishes water quality objectives for the protection of these beneficial uses, and outlines a plan of implementation for maintaining and enhancing water quality. The proposed amendment would incorporate into the Basin Plan a TMDL for toxicity and the pesticides chlorpyrifos and diazinon in Calleguas Creek, its tributaries, and Mugu Lagoon.

The Regional Board has identified Calleguas Creek, its tributaries, and Mugu Lagoon as impaired due to toxicity and the pesticides chlorpyrifos and diazinon. The beneficial uses most likely to be impaired by toxicity, chlorpyrifos and diazinon loadings are those associated with aquatic life and wildlife, including wildlife habitat (WILD), rare, threatened or endangered species (RARE), warm freshwater habitat (WARM), and wetlands (WET).

The Regional Board's goal in incorporating the TMDL is to protect and restore the overall water quality in Calleguas Creek, its tributaries and Mugu Lagoon by controlling the loading of sediment and pesticides. The adoption of a TMDL is not discretionary and is compelled by both section 303(d) of the federal Clean Water Act (33 USC 1313(d)) and by a federal consent decree. The proposed TMDL sets numeric water quality targets based on federal and state standards and guidance.

The proposed TMDL establishes a 10-year implementation schedule for compliance. The implementation plan includes water quality monitoring, waste pesticide collection and Best Management Practices for sediment control. The proposed TMDL also consists of a monitoring program to assess compliance with the waste load allocations; to collect additional data in order to evaluate the uncertainties and assumptions made in development of the TMDL, and to collect data to evaluate potential management scenarios.

II. GENERAL ENVIRONMENTAL COMMENTS

The detailed environmental setting and authority for the Calleguas Creek Watershed toxicity, chlorpyrifos and diazinon TMDL is set forth in the detailed technical reports entitled "Total Maximum Daily Load for toxicity and the pesticides chlorpyrifos and diazinon and removing the related impairments from Calleguas Creek, its tributaries, and Mugu Lagoon." The report identifies the environmental setting and need for the project. In addition, the report identifies the reasonably foreseeable methods of compliance. As established in the technical report, response to comments, hearings, and the administrative record, there is no one-size-fits-all implementation strategy for dischargers. Individual dischargers will most likely opt for a mix of pollution prevention, sediment removal, and structural and non-structural BMPs to implement the TMDL.

The Regional Board has considered potential environmental impacts arising from the reasonably foreseeable means of compliance with the TMDL. (Pub. Res. Code, § 21159(a).) Many of these compliance approaches are already required under existing law, since the CTR establishes federal, numeric water quality standards for many of the pesticides subject to this TMDL. The continued

exceedance of water quality standards is itself an adverse environmental impact, as the receiving water will remain toxic to aquatic life during the implementation period for the TMDL. The TMDL allows for a 10 year implementation period to bring the waterbody into compliance with water quality standards;however, the Regional Board staff has determined that the 10-year period is reasonable and as short as practicable to allow dischargers to implement a complex, yet efficient, mix of projects to comply with the waste load allocations. The adverse impacts of non-compliance with water quality standards are mitigated through a progressive reduction in the loading of pollutants to Calleguas Creek, its tributaries and Mugu Lagoon through a schedule that is reasonable and as short as practicable.

Based on information developed during the CEQA scoping process, the accompanying CEQA checklist identifies the reasonably foreseeable environmental impacts of the methods of compliance. (Pub. Res. Code, § 21159(a)(1).) This analysis is a program-level (i.e., macroscopic) analysis. CEQA does not require the Regional Board to conduct a project-level analysis of environmental impacts. (Pub. Res. Code, § 21159(d).) Similarly, the CEQA substitute documents do not engage in speculation or conjecture. (Pub. Res. Code, § 21159(a).) When the programmatic CEQA scoping identifies a potential environmental impact, the accompanying analysis identifies reasonably foreseeable feasible mitigation measures. (Pub. Res. Code, § 21151(a)(2).) Because dischargers will most likely use a combination of structural and non-structural BMPs, the CEQA substitute documents have identified the reasonably foreseeable alternative means of compliance. (Pub. Res. Code, § 21159(a)(3).)

The Dischargers are likely to use a dynamic combination of structural and non-structural BMPs that will vary from project to project. These project-level determinations could have environmental impacts if not properly mitigated at the project level. Project proponents will need to consider mitigation such as alternative siting, varying construction times for any projects requiring construction activities, and designing systems to minimize the potential for flooding. With respect to potential environmental impacts that may occur at the project level, the accompanying checklist identifies the types of mitigation that may be feasible. In the event that a specific BMP may have impacts that can not feasibly be mitigated, the project proponent may need to consider an alternative BMP or combination of BMPs to comply with the TMDL. Furthermore, to the extent the alternatives, mitigation measures, or both, are not deemed feasible by those agencies, the necessity of implementing the federally required TMDL and removing the toxicity and the pesticides chlorpyrifos and diazinon and removing the related impairments from Calleguas Creek, its tributaries, and Mugu Lagoon (an action required to achieve the express, national policy of the Clean Water Act) outweigh the unavoidable adverse environmental effects.

III. ENVIRONMENTAL CHECKLIST		Environmental Impacts YES	MAYBE	NO
1.	**Earth. Will the proposal result in:**			
	a. Unstable earth conditions or in changes in geologic substructures?			No
	b. Disruptions, displacements, compaction or overcoming of the soil?		Maybe	
	c. Change in topography or ground surface relief features?			No
	d. The destruction, covering or modification of any unique geologic or physical features?			No
	e. Any increase in wind or water erosion of soils, either on or off the site?			No
	f. Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?			No
	g. Exposure of people or property to geologic hazards, such as earthquakes, landslides, mudslides, ground failure, or similar hazards?			No
2.	**Air. Will the proposal result in:**			
	a. Substantial air emissions or deterioration of ambient air quality?		Maybe	
	b. The creation of objectionable odors?			No
	c. Alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally?			No
3.	**Water. Will the proposal result in:**			
	a. Changes in currents, or the course of direction or water movements, in either marine or fresh waters?			No
	b. Changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff?	Yes		
	c. Alterations to the course of flow of flood waters?		Maybe	
	d. Change in the amount of surface water in any water body?		Maybe	
	e. Discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen, or turbidity?	Yes		
	f. Alteration of the direction or rate of flow of ground waters?		Maybe	

III. ENVIRONMENTAL CHECKLIST		Environmental Impacts YES MAYBE NO
	g. Change in the quantity or quality of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?	Maybe
	h. Substantial reduction in the amount of water otherwise available for public water supplies?	No
	i. Exposure of people or property to water related hazards such as flooding or tidal waves?	Maybe
4.	**Plant Life. Will the proposal result in:**	
	a. Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, microflora and aquatic plants)?	No
	b. Reduction of the numbers of any unique, rare or endangered species of plants?	No
	c. Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?	No
	d. Reduction in acreage of any agricultural crop?	No
5.	**Animal Life. Will the proposal result in:**	
	a. Change in the diversity of species, or numbers of any species of animals (birds, land animals including reptiles, fish and shellfish, benthic organisms, insects or microfauna)?	No
	b. Reduction of the numbers of any unique, rare or endangered species of animals?	No
	c. Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?	No
	d. Deterioration to existing fish or wildlife habitat?	Maybe
6.	**Noise. Will the proposal result in:**	
	a. Increases in existing noise levels?	Maybe
	b. Exposure of people to severe noise levels?	No
7.	**Light and Glare. Will the proposal:**	
	a. Produce new light or glare?	No

III. ENVIRONMENTAL CHECKLIST		Environmental Impacts YES	MAYBE	NO
8.	**Land Use. Will the proposal result in:** a. Substantial alteration of the present or planned land use of an area?		Maybe	
9.	**Natural Resources. Will the proposal result in:** a. Increase in the rate of use of any natural resources?			No
	b. Substantial depletion of any nonrenewable natural resource?			No
10.	**Risk of Upset. Will the proposal involve:** a. A risk of an explosion or the release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation) in the event of an accident or upset conditions?			No
11.	**Population. Will the proposal:** a. Alter the location, distribution, density, or growth rate of the human population of an area?			No
12.	**Housing. Will the proposal:** a. Affect existing housing, or create a demand for additional housing?			No
13.	**Transportation/Circulation. Will the proposal result in:** a. Generation of substantial additional vehicular movement?			No
	b. Effects on existing parking facilities, or demand for new parking?			No
	c. Substantial impact upon existing transportation systems?			No
	d. Alterations to present patterns of circulation or movement of people and/or goods?		Maybe	
	e. Alterations to waterborne, rail or air traffic?		Maybe	
	f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians?			No
14.	**Public Service. Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:** a. Fire protection?			No
	b. Police protection?			No
	c. Schools?			No
	d. Parks or other recreational facilities?			No

III. ENVIRONMENTAL CHECKLIST		Environmental Impacts YES	MAYBE	NO
	e. Maintenance of public facilities, including roads?	Yes		
	f. Other governmental services?	Yes		
15.	**Energy. Will the proposal result in:**			
	a. Use of substantial amounts of fuel or energy?			No
	b. Substantial increase in demand upon existing sources of energy, or require the development of new sources of energy?			No
16.	**Utilities and Service Systems. Will the proposal result in a need for new systems, or substantial alterations to the following utilities:**			
	a. Power or natural gas?			No
	b. Communications systems?			No
	c. Water?			No
	d. Sewer or septic tanks?			No
	e. Storm water drainage?	Yes		
	f. Solid waste and disposal?			No
17.	**Human Health. Will the proposal result in:**			
	a. Creation of any health hazard or potential health hazard (excluding mental health)?		Maybe	
	b. Exposure of people to potential health hazards?			No
18.	**Aesthetics. Will the proposal result in:**			
	a. The obstruction of any scenic vista or view open to the public?			No
	b. The creation of an aesthetically offensive site open to public view?		Maybe	
19.	**Recreation. Will the proposal result in:**			
	a. Impact upon the quality or quantity of existing recreational opportunities?			No
20.	**Archeological/Historical. Will the proposal:**			
	a. Result in the alteration of a significant archeological or historical site structure, object or building?			No
21.	**Mandatory Findings of Significance**			
	Potential to degrade: Does the project have the potential to degrade the			No

III. ENVIRONMENTAL CHECKLIST		Environmental Impacts YES MAYBE NO
	quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	
	Short-term: Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively brief, definitive period of time, while long-term impacts will endure well into the future.)	No
	Cumulative: Does the project have impacts that are individually limited, but cumulatively considerable? (A project may impact on two or more separate resources where the impact on each resource is relatively small, but where the effect of the total of those impacts on the environment is significant.)	No
	Substantial adverse: Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	No

IV. DISCUSSION OF ENVIRONMENTAL EVALUATION

Expand on all "YES" and "MAYBE" answers given to the preceding questions in regard to environmental impacts. The evaluation shall consider whether the environmental impact indicated will have a substantial, adverse change in any of the physical conditions within the area affected by the activity. In addition, the evaluation should discuss environmental effects in proportion to their severity and probability of occurrence. (Use additional pages if necessary.)

1. Earth. b. Will the proposal result in disruptions, displacements, compaction or overcoming of the soil?

Answer: Maybe

Depending on the implementation strategy chosen, the proposal may result in the use of infiltration devices or other structural BMPs to treat of a portion of storm water, which could result in disruptions of the soil by increasing the rate at which water is discharged to the ground. This potential adverse impact could be mitigated to less than significant levels if structural BMPs are properly designed and sited in areas where risks to soil disruption are minimal.

2. Air. a. Will the proposal result in substantial air emissions or deterioration of ambient air quality?

Answer: Maybe

Depending on the implementation strategy chosen, sediment removal could result in increased air emissions. However, any potential air emissions resulting from construction or operational activities would be subject to regulation by the applicable air pollution control agency. However, any unmitigable impacts on air resources would be short-term in duration and are outweighed by the necessity of implementing the federally required toxicity, chlorpyrifos and diazinon TMDL and removing the related impairments from Calleguas Creek, its tributaries, and Mugu Lagoon (an action required to achieve the express, national policy of the Clean Water Act).

3. Water.

3. Water. b. Will the proposal result in changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff?

Answer: Yes

Changes in drainage patterns and the rate and amount of surface water runoff will occur if a portion of storm water is diverted and/or captured and treated or structural BMPs are implemented to achieve compliance with the TMDL. Changes in surface water runoff (i.e., reduction in polluted flows) resulting from the use of infiltration devices and other structural BMPs would be considered a positive environmental impact. The change in runoff may also be temporary if runoff is treated and released back to the stream. Such devices address the effects of development and increased impervious surfaces in the watershed.

IV. DISCUSSION OF ENVIRONMENTAL EVALUATION (continued)

3. Water. c. Will the proposal result in alterations to the course of flow of flood waters?

Answer: Maybe

Depending on the implementation strategy chosen, the proposal may result in the diversion and storage of a portion of storm water, altering its current course of flow in the river. However, if properly sited and designed, treatment strategies will not reduce the flood control function of Calleguas Creek and therefore these impacts would be less than significant. Moreover, they will likely reduce peak floodwater flows, which would be a positive impact.

3. Water. d. Will the proposal result in change in the amount of surface water in any water body?

Answer: Maybe

A change in the amount of surface water in waterbodies may occur if compliance with the TMDL is achieved by infiltration of storm water runoff or by diverting a portion of runoff to wastewater or urban runoff treatment facilities. Changes in surface water quantity resulting from the use of infiltration devices and other structural BMPs would be considered a positive environmental impact. Such devices address the effects of development and increased impervious surfaces in the watershed.

3. Water. e. Will the proposal result in discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen, or turbidity?

Answer: Yes

The proposed TMDL will improve surface water quality.

3. Water. f. Will the proposal result in alteration of the direction or rate of flow of ground waters?

Answer: Maybe

A change in the rate of flow of ground waters may occur if compliance with the TMDL is achieved through significant infiltration of storm water. Increased groundwater recharge would be considered a positive impact by the proposal.

3. Water. g. Change in the quantity or quality of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?

Answer: Maybe

A change in the quantity of ground waters may occur if compliance with the TMDL is achieved through significant infiltration of storm water. Increased groundwater recharge would be considered a positive impact by the proposal. If infiltration devices are not properly sited and constructed, ground water quality

IV. DISCUSSION OF ENVIRONMENTAL EVALUATION (continued)

could be adversely impacted. The potential for adverse impacts may be mitigated through proper design and siting of infiltration devices and through groundwater monitoring.

3. Water. i. Will the proposal result in exposure of people or property to water related hazards such as flooding or tidal waves?

Answer: Maybe

Depending on the implementation strategy chosen, the proposal may result in flooding hazards if structural BMPs are not properly designed, constructed, or maintained to allow for bypass of storm water during storms that exceed design capacity.

5. Animal Life. d. Will the proposal result in deterioration to existing fish or wildlife habitat?

Answer: Maybe

A change in the amount of surface water may occur if compliance with the TMDL is achieved by diverting a portion of agricultural runoff. However, Calleguas Creek receives significant continual flow from groundwater discharge and POTW effluent and the critical flow needed for aquatic life habitat would be required to be maintained despite a diversion of runoff. In addition, any diversion project would be required to assess and mitigate any potential impacts to aquatic life habitat. If there is a reduction in wildlife habitat, the environmental benefits of the project, water quality that is not toxic to the wildlife, override the marginal losses in habitat.

6. Noise. a. Will the proposal result in increases in existing noise levels?

Answer: Maybe

Depending on the implementation strategy chosen, the proposal may result in increases in existing noise levels, particularly in the case of construction of storage, diversion or treatment facilities for storm water. The potential for increased noise levels due to construction are limited and short-term. Potential impacts could be reduced by limiting or restricting hours of construction use of sound barriers, or auxiliary mufflers on construction equipment.

8. Land Use. a. Will the proposal result in substantial alteration of the present or planned land use of an area?

Answer: Maybe

Depending on the implementation strategy chosen, the proposal may result in alteration of the present or planned land use of an area to provide land for storage, diversion or treatment facilities for agricultural runoff water. However, projects may be designed to address the need for more parks and wildlife habitat and to improve water quality.

IV. DISCUSSION OF ENVIRONMENTAL EVALUATION (continued)

13. Transportation/Circulation. d. Will the proposal result in alterations to present patterns of circulation or movement of people and/or goods?

Answer: Maybe

Depending on the implementation strategy chosen, the proposal may result in temporary alterations to present traffic patterns during construction of storm water diversion or treatment facilities. The potential impacts are limited and short-term. Potential impacts could be reduced by limiting or restricting hours of construction.

13. Transportation/Circulation. e. Will the proposal result in Alterations to waterborne, rail or air traffic?

Answer: Maybe

See answer to 13.d.

14. Public Service. e. Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas: maintenance of public facilities, including roads?

Answer: Yes

The proposal will result in the need for increased maintenance of storm water diversion facilities or structural BMPs. Non-structural BMPs, such as increased storm drain catch basin cleanings and improved street cleaning, would require additional road maintenance as well.

14. Public Service. f. Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas: other government services?

Answer: Yes.

The proposal will result in the need for increased monitoring in Calleguas Creek, its tributaries, and Mugu Lagoon to track compliance with the TMDL. Non-structural BMPs, such as education and outreach, would result in the need for new or altered governmental services. In addition, as described in 14.e., additional maintenance would be required for street sweeping and structural BMP maintenance.

16. Utilities and Service Systems. e. Will the proposal result in a need for new systems, or substantial alterations to the following utilities: storm water drainage?

Answer: Yes

In order to achieve compliance with the TMDL, storm water drainage systems may need to be retrofitted with structural BMPs or re-configured to divert and/or capture and treat a portion of storm water.

IV. DISCUSSION OF ENVIRONMENTAL EVALUATION (continued)

17. Human Health. a. Will the proposal result in creation of any health hazard or potential health hazard (excluding mental health)?

Answer: Maybe

The implementation of storm water detention and treatment BMPs could create a potential health hazard if facilities are not properly maintained to include vector (mosquito) control. This potential adverse impact can be mitigated by designing systems that minimize stagnant water conditions and/or by requiring oversight and treatment of those systems by vector control agencies.

18. Aesthetics. b. Will the proposal result in the creation of an aesthetically offensive site open to public view?

Answer: Maybe

Depending on the implementation strategy chosen, the proposal may result in the installation of storage, diversion or treatment facilities and structural BMPs for storm water that could be aesthetically offensive if not properly designed, sited, and maintained. However, many structural BMPs are designed to provide habitat, recreational areas, and green spaces in addition to improving storm water quality.

V. DETERMINATION

The implementation of this TMDL will result in improved water quality in Calleguas Creek, its tributaries, and Mugu Lagoon and will not have significant adverse impacts to the environment. Specific projects employed to implement the TMDL may have significant impacts, but these impacts are expected to be limited, short-term or may be mitigated through design and scheduling. The staff report for the TMDL and this checklist provide the necessary information pursuant to Public Resources Code section 21159 to conclude that properly designed and implemented BMPs or treatment systems will not have a significant adverse effect on the environment. Any of the potential impacts would need to be mitigated at a subsequent, project level because they would involve the design of a specific BMP or treatment system. At this stage, any conclusions would be speculative. Specific projects, which may have a significant impact, would be subject to a separate environmental review. The lead agency for subsequent projects would be obligated to mitigate any impacts they identify, for example by mitigating potential flooding impacts by designing the BMPs with adequate margins of safety. To the extent the alternatives, mitigation measures, or both, are subsequently deemed not feasible by agencies complying with the TMDL, the necessity of implementing the federally required toxicity, chlorpyrifos and diazinon TMDL and removing the impairments from Calleguas Creek, its tributaries and Mugu Lagoon (an action required to achieve the express, national policy of the Clean Water Act) outweigh the unavoidable adverse environmental effects.

On the basis of this initial evaluation and staff report for the TMDL, which collectively provide the required information:

☐ I find the proposed Basin Plan amendment could not have a significant effect on the environment.

☒ I find that the proposed Basin Plan amendment could have a significant adverse effect on the environment. However, there are feasible alternatives and/or feasible mitigation measures that would substantially lessen any significant adverse impact. These alternatives are discussed above and in the staff report for the TMDL.

☐ I find the proposed Basin Plan amendment may have a significant effect on the environment. There are no feasible alternatives and/or feasible mitigation measures available which would substantially lessen any significant adverse impacts. See the attached written report for a discussion of this determination.

DATE: 5-31-05

Jonathan Bishop
Executive Officer