

# **Substitute Environmental Documents for Proposed Amendment to the Los Angeles Water Quality Control Plan (Basin Plan) – to Incorporate 2013 United States Environmental Protection Agency “Aquatic Life Ambient Water Quality Criteria for Ammonia – Freshwater” in the Los Angeles Region**

Prepared under the California Environmental Quality Act (CEQA)  
Requirements of a Certified Regulatory Program

## **1. Executive Summary**

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) is the lead agency for evaluating the environmental impacts of the proposed amendment to the Los Angeles Water Quality Control Plan (Basin Plan) – to incorporate 2013 United States Environmental Protection Agency “Aquatic Life Ambient Water Quality Criteria for Ammonia – Freshwater” in the Los Angeles Region. This Substitute Environmental Document (SED) analyzes environmental impacts that may occur from reasonably foreseeable methods of implementing the updated objectives. This SED is based on a proposed Basin Plan Amendment that will be considered by the Los Angeles Water Board. The Basin Plan amendment is described in the Staff Report, Tentative Board Resolution, and Tentative Basin Plan Amendment (BPA) available on the Los Angeles Water Board’s website. This SED analyzes foreseeable methods of compliance with the update of the objectives and evaluates the potential environmental impacts, mitigation, and alternatives in accordance with the California Environmental Quality Act (CEQA).

The SED will be considered by the Los Angeles Water Board when the Los Angeles Water Board considers adoption of the Basin Plan amendment. Approval of the SED is separate from approval of a specific project alternative or a component of an alternative and refers to the process of: (1) addressing comments, (2) confirming that the Los Angeles Water Board considered the information in the SED, and (3) affirming that the SED reflects independent judgment and analysis by the Los Angeles Water Board CEQA Guidelines sections 10590 and 15090, title 14 of California Code of Regulations.

## **2. Regulatory Requirements**

This section presents the regulatory requirements for assessing environmental impacts of a Basin Plan amendment at the Los Angeles Water Board. This Basin Plan amendment

is evaluated at program-level detail under a Certified Regulatory Program, and the information and analyses are presented in this SED as discussed in this section.

## **2.1. Exemption from Certain CEQA Requirements**

The California Secretary of Natural Resources has certified the State and Regional Water Boards' basin planning process as exempt from certain requirements of the CEQA, including preparation of an initial study, negative declaration, and environmental impact report (Cal. Code Regs., tit. 14, § 15251, subd. (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 for an initial study, negative declaration, and/or environmental impact report.

## **2.2 California Code of Regulations and Public Resources Code Requirements**

While the certified regulatory program of the Los Angeles Water Board is exempt from certain CEQA requirements, it is subject to the substantive requirements of California Code of Regulations, title 23, section 3777, subdivision (a), which requires a written report that includes a description of the proposed activity, an analysis of reasonable alternatives, and an identification of mitigation measures to minimize any significant adverse environmental impacts. Section 3777, subdivision (a) also requires the Los Angeles Water Board to complete an environmental checklist as part of its substitute environmental documents. The checklist is provided in this document.

In addition, the Los Angeles Water Board must fulfill substantive obligations when adopting performance standards as described in Public Resources Code section 21159. Section 21159, which allows expedited environmental review for mandated projects, provides that an agency shall perform, at the time of the adoption of a rule or regulation requiring the installation of pollution control equipment, or a performance standard or treatment requirement, an environmental analysis of the reasonably foreseeable methods of compliance. The statute further requires that the environmental analysis at a minimum, include, all of the following:

- (1) An analysis of the reasonably foreseeable environmental impacts of the methods of compliance.
- (2) An analysis of reasonably foreseeable feasible mitigation measures to lessen the adverse environmental impacts.
- (3) An analysis of reasonably foreseeable alternative means of compliance with the rule or regulation that would have less significant adverse impacts (Public Res. Code, § 21159, subd. (a).)

Section 21159, subdivision (c) requires that the environmental analysis take into account a reasonable range of:

- (4) Environmental, economic, and technical factors,

- (5) Population and geographic areas, and
- (6) Specific sites.

## **2.2. Program- and Project-Level Analysis**

Public Resources Code section 21159, subdivision (d) specifically states that the public agency is not required to conduct a “project-level analysis.” Rather, a project-level analysis must be performed by the local agencies that are required to implement the requirements of the TMDL (Public Res. Code, § 21159.2). Notably, ***the Los Angeles Water Board is prohibited from specifying the manner of compliance with its orders*** (Wat. Code, § 13360), and accordingly, the actual environmental impacts will necessarily depend upon the compliance strategy selected by the local agencies and other permittees.

The SED identifies the reasonably foreseeable environmental impacts of the ***reasonably foreseeable*** methods of compliance (Public Res. Code, § 21159, subd. (a)(1)), based on information developed before, during, and after the CEQA scoping process that is specified in Public Resources Code section 21083.9. This analysis is a program-level (i.e., macroscopic) analysis. CEQA requires the Los Angeles Water Board to conduct a program-level analysis of environmental impacts (Public Res. Code, § 21159, subd. (d)). Similarly, the CEQA substitute documents do not engage in speculation or conjecture (Public Res. Code, § 21159, subd. (a)). When the CEQA analysis identifies a potentially significant environmental impact, the accompanying analysis identifies reasonably foreseeable feasible mitigation measures (Public Res. Code, § 21159, subd. (a)(2)). Because responsible agencies will most likely use a combination of structural and non-structural BMPs, the SED has identified the reasonably foreseeable alternative means of compliance (Public Res. Code, § 21159, subd. (a)(3)).

## **2.3. CEQA Scoping Meeting**

CEQA requires the Los Angeles Water Board to seek early public consultation with public agencies and members of the public prior to circulating the SED (Cal. Code Regs., tit. 23, § 3775.5, subd. (a).) The consultation may include one or more scoping meetings to engage the stakeholders and public agencies early in the planning and formulation stages of the project to scope the range of actions, alternatives, reasonably foreseeable methods of compliance, significant impacts, and cumulative impacts, if any, that should be analyzed in the study and mitigation measures that will reduce impacts to a less than significant level, and to eliminate from the project any elements found not to be important (Cal. Code Regs., tit. 23, § 3775.5, subd. (b).). A virtual (online) CEQA Scoping Meeting for this project was held on November 17, 2022. Notice for the meeting is available on [Los Angeles Water Board's Basin Planning website](#) and presentation material was emailed to all registrants of the meeting. Video recording of the meeting is available on Los Angeles Water Board's FTP site.

## **3. Compliance with AB 52: Consultation with California Native American Tribes**

In 2014, Assembly Bill (AB) 52 (Gatto) established a new category of resources in CEQA called Tribal Cultural Resources. These resources are either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
  - a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
  - b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe. (Pub. Resources Code, § 21074.)

AB 52 also established a consultation process with all California tribes on the Native American Heritage Commission List. Consultation with a California Native American tribe that has requested such consultation may assist a lead agency in determining whether the project may adversely affect tribal cultural resources, and if so, how such effects may be avoided or mitigated. AB 52 requires formal notice to California tribes of an opportunity to consult with the lead agency prior to the release of a negative declaration, mitigated negative declaration, or SED if the tribe is traditionally and culturally affiliated with the geographic area of the proposed project.

The requirements to consider tribal cultural resources and to consult with California tribes apply to CEQA projects for which the lead agency issues a notice of preparation or a notice of intent to adopt a negative declaration or mitigated negative declaration on or after July 1, 2015. The State Water Board considers Assembly Bill 52's requirements as also applying to the preparation of an SED.

Pursuant Public Resources Code § 21080.3.1 (AB 52 Gatto), between August 26 and September 1, 2022, the Los Angeles Water Board sent letters to eight tribes that are required to be contacted for CEQA projects being initiated in the Los Angeles Region to receive AB 52 notices and to 66 tribal representatives in Los Angeles, Ventura and other counties as identified by the Native American Heritage Commission. The Los Angeles Water Board received no response to the letters requesting consultation on the project. Only one email was received from San Manuel Tribe on September 26, 2022 stated that unless anything changed, they had no concern over the project.

#### **4. Purpose of CEQA**

CEQA's basic purposes are to: 1) inform the decision makers and public about the potential significant environmental effects of a proposed project, 2) identify ways that environmental damage may be mitigated, 3) prevent significant, avoidable damage to the

environment by requiring changes in projects, through the use of alternative or mitigation measures when feasible, and 4) disclose to the public why an agency approved a project if significant effects are involved (Cal. Code Regs., tit. 14, § 15002, subd. (a)).

To fulfill these functions, a CEQA review "...need only be adequate, complete, and a good faith effort at full disclosure "(Cal. Code Regs., tit. 14, § 15151) (*City of Fremont v. San Francisco Bay Area Rapid Transit Dist.*, supra, 34 Cal.App.4th at p. 1786.) In *River Valley Preservation Project v. Metropolitan Transit Development Board* (1995) 37 Cal.App.4th 154, 178: "[a]s we have stated previously, "[our] limited function is consistent with the principle that [t]he purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind..." (*City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1448 [263 Cal. Rptr. 340]; quoting *Laurel Heights I*, supra, 47 Cal.3d at p. 393).

Nor does CEQA require unanimity of opinion among experts. The analysis is satisfactory as long as those opinions are considered (Cal. Code Regs., tit. 14, § 15151).

In this document, the Los Angeles Water Board staff has performed a good faith effort at full disclosure of the reasonably foreseeable environmental impacts that could be attendant with the proposed Basin Plan amendment.

## **5. Project Description**

The Project description, project goals and proposed ammonia objectives and fully described in the Staff Report.

## **6. Environmental Setting**

The state CEQA Guidelines require identification of the "precise location and boundaries of the project [to be] shown on a detailed map." The location of the Los Angeles Water Board's project is all freshwater streams and lakes of the Los Angeles Region (Figure 1).



environmental impacts associated with compliance, the CWA and California Water Code do not allow for partial protection of beneficial uses.

## **7.1. Program Alternatives**

### **7.1.1. Alternative 1 – Adoption of the Basin Plan Amendment**

This program alternative is based on the Basin Plan amendment that is presently proposed for Los Angeles Water Board consideration. The Basin Plan amendment will be implemented through Los Angeles Water Board surface water implementation programs including NPDES and WDR permits.

During the development of the Basin Plan amendment, on November 17, 2022, a CEQA scoping meeting was held during which the manner of compliance was discussed. Given that the proposed objectives will be similar to or less stringent than the current objectives for most reaches in the Los Angeles Region while remaining protective of beneficial uses, staff found that there would be less than significant impacts and/or no impacts with the proposed new freshwater ammonia criteria and invited stakeholders to provide comment or additional information.

The Los Angeles Water Board has taken a number of actions to monitor and regulate nutrients including ammonia in the Region's water bodies. Almost all wastewater treatment plants discharging to freshwater in the Los Angeles region use N/DN<sup>1</sup> (nitrification-denitrification, the use of N/DN treatment by wastewater treatment plants is considered part of the baseline or current conditions to control ammonia level. Under the Surface Water Ambient Monitoring Program (SWAMP), the Los Angeles Water Board conducted water quality assessments through their ambient monitoring program for the Santa Monica Bay, Calleguas Creek, Santa Clara River, Dominguez Channel, San Gabriel River, and Los Angeles/Long Beach Harbor Management Area Watersheds between FY 2001 – 2003 to record and measure any impairments (including nutrients) present in water bodies<sup>2</sup>. These monitoring efforts were used to better characterize sites with exceedances to meet the Los Angeles Water Board's needs for programs such as 303(d) listings and the development of TMDLs that manage nutrient concentrations for specific water bodies, which are available on Chapter 7 of the Basin Plan. Other future efforts include a statewide provision of biostimulatory substances (compounds that stimulate excess aquatic growth), including water quality objectives for total nitrogen and total phosphorus. Since 2005, the Los Angeles Water Board has also regulated nonpoint source (NPS) discharges from irrigated agriculture activities under a Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands, which includes the management of nutrients<sup>3</sup>.

---

<sup>1</sup> The exception is Malibu Mesa which recycles all its water and retains an NPDES permit in case of uncommon discharge, however, Malibu Mesa is planning on upgrading the facility to a membrane bioreactor to provide full N/DN by 2026.

<sup>2</sup> Basin Plan: Chapter 6. Monitoring and Assessment

<sup>3</sup> Basin Plan: Chapter 4. Strategic Planning and Programs of Implementation

### **7.1.2. Alternative 2 – No Program Alternative**

This program alternative assumes that the Los Angeles Water Board does not adopt nor implement the Basin Plan amendment. While there would be no potential for environmental impacts, the Los Angeles Region would not be implementing the most recent EPA guidance for ammonia.

### **7.1.3. Recommended Program Alternative**

This environmental analysis finds that Alternative 1 is the most environmentally advantageous alternative because it will provide for protection of beneficial uses with the most recent EPA ammonia guidance.

## **7.2. Project-Level Alternatives**

The program alternatives above do not require any specific projects to achieve compliance. Rather, if a project is necessary to comply with the Basin Plan amendment, a project-level analysis must be performed by the local agencies that are required to implement the requirements of the TMDL (Public Res. Code, § 21159.2). Notably, the Water Boards are prohibited from specifying the manner of compliance with its orders (Wat. Code, § 13360), and accordingly, the actual environmental impacts will necessarily depend upon the compliance strategy selected by the local municipalities, agencies, and other permittees.

The components assessed at a project level have specific locations which will be determined by implementing municipalities and agencies. The project-level components will be subject to additional future environmental review, including review by cities and municipalities implementing bacteria TMDL projects.

## **8. Implementation Alternatives and Site-Specific Analysis**

The Los Angeles Water Board is prohibited from specifying the manner of compliance with its orders (Wat. Code, § 13360), and accordingly, the actual compliance strategies will be selected by the local agencies and other permittees. Although the Los Angeles Water Board does not mandate the manner of compliance, foreseeable methods of compliance are well known.

Because almost all wastewater treatment plants discharging to freshwater in the Los Angeles region use N/DN already and the one exception is already planning N/DN without the Basin Plan amendment, no additional construction of N/DN facilities is anticipated to be necessary.

For waterbodies that receive discharge from approximately 97,000 acres of irrigated agricultural fields that are or may be generating nonpoint source pollution in Los Angeles Region, compliance with the “Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region” or with the expected “Waste Discharge Requirements for Discharges from Irrigated Lands within the Los Angeles Region” will be the primary mechanism to control discharge. Nitrogen

management in agricultural fields can be achieved by implementing common agricultural practices, such as crop rotation, no-tillage, and fertilizer scheduling as required by regulatory orders for irrigated agricultural lands. Changes in ammonia objectives due to this Basin Plan amendment are not significantly different from the current objectives in the Basin Plan and will not result in a reduction or increase in nitrogen management practices that are required.

## 9. Environmental Impacts of Incorporating 2013 Ammonia Criteria

### 9.1. Aesthetics

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. Due to its nutrient properties, ammonia can cause eutrophic (heavy plant growth) conditions. The exact combination of factors (e.g., climate, flow, other nutrients such as phosphorus) that lead to eutrophication are well but not completely understood, including scientists' predictive ability of the phenomenon. Because rivers and other fresh waterbodies may be considered scenic resources, eutrophication, if happens, can reduce the value of scenic resources.

Because ammonia is addressed by current ammonia objectives and the proposed objectives will be similar to or less stringent than the current objectives for most reaches in the Los Angeles Region, approval and implementation of the proposed ammonia objectives would not change the aesthetic conditions, relative to existing conditions. Overall, the proposed Basin Plan amendment would have **less-than-significant impact** on aesthetic conditions in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare that would adversely	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

affect day or nighttime views in the area?

## 9.2. Agricultural Resources

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. Approval and implementation of the proposed ammonia objectives would not adversely affect agricultural resources (e.g., farmland conversion to non-agricultural uses and vice versa). The generally less stringent ammonia criteria under the proposed objectives would instead potentially offer a relief for agricultural producers under compliance with the current Basin Plan objectives for most water body reaches in the Los Angeles Region while remain protective of aquatic life. Consequently, no agricultural resources, including farmland irrigation and livestock watering, would be affected by the proposed project. Overall, the proposed Basin Plan amendment would have **no impact** on agricultural resources in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping & Monitoring Program of the California Resources Agency, to non-agricultural uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined by Public Resources Code section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 9.3. Air Quality

The proposed project would establish updated ammonia objectives for the Los Angeles Region through approval of the proposed Basin Plan amendment to protect aquatic life beneficial uses. Because a low quantity of ammonia does not directly affect air quality, there would be no direct impacts from the proposed project on air quality.

Since implementation of the proposed project would not involve any construction-related activities that would generate increased concentrations of pollutants, objectionable odors, or obstruct the implementation of any air quality plan, there would be no secondary impacts from the proposed project on air quality.

In addition, if a construction project were necessary, since Best Management Practices (BMPs) would be implemented and effects on these resource areas would be temporary, construction-related impacts to air quality, noise, and transportation/traffic, the proposed Basin Plan amendment would have **less-than-significant impact** on air quality in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 9.4. Biological Resources

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. States are required to protect all beneficial uses, including the uses of water that support habitats that are necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered. Although the unionid mussel can

be removed from the national criteria dataset for the site-specific recalculation procedure, U.S. EPA maintains the data from non-unionid bivalves *Musculium* (i.e., the fourth most sensitive genus in the national dataset for the chronic criteria). U.S. EPA also states that existing data from sensitive freshwater snails “are not likely to be deleted from the datasets in a criteria recalculation” due to their ubiquitous presence in the environment. In the 2013 update, the pH and temperature dependence are therefore maintained for the chronic ammonia objectives and introduced for the acute ammonia objectives, which corresponds to greater recognition of invertebrates’ sensitivity to ammonia in general.

For water bodies in the Los Angeles Region, three fish species are identified as threatened or endangered: unarmored three-spine stickleback (*Gasterosteus aculeatus williamsoni*), Santa Ana sucker (*Catostomus santaanae*), and steelhead trout (*Oncorhynchus mykiss*). In the 2013 update, U.S. EPA specifies that recalculation procedures for acute ammonia criteria should “retain all tested species in the Order Salmoniformes as tested surrogate species representing untested freshwater fish resident in the US from another Order”. In addition, U.S. EPA specifies that the Species Sensitivity Distribution relationship must be maintained from the complete acute dataset. Salmonids are considered highly sensitive to ammonia. The mountain whitefish *Prosopium williamsoni*, which is the most acutely-sensitive genus of salmonids, is ranked as the eighth most sensitive GMAV after seven more sensitive GMAVs of freshwater mussel species. For the recalculation of chronic ammonia criteria, two of the four most sensitive genera are fish ELS. In addition, the proposed ammonia criteria only relax the chronic ammonia objective at temperatures <22°C or <71.6°F when ELS are not present compared to the 1999 ammonia criteria that only relax the chronic ammonia objective at temperatures <15°C or <59°F. To protect fish ELS, the Los Angeles Water Board took a conservative approach by converting all reaches to ELS present condition since there are potentially more fish species that reproduce at temperatures <22°C than at temperatures <15°C. Therefore, more fish species should be protected under the proposed objective and the proposed Basin Plan amendment would have **no impact** on biological resources in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

California Department of Fish and Wildlife  
or U.S. Fish and Wildlife Service?

c. Have a substantial adverse effect on federally-protected wetlands as defined by Section 404 of the federal Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, *etc.*) through direct removal, filling, hydrological interruption or other means?

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites?

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

### 9.5. Cultural Resources

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not involve any action or activity that would cause an adverse change in historical, archaeological, paleontological resources, or human remains (e.g., exposure, destruction).

Furthermore, if construction was required, there was some excavations or other activities that could cause a substantial adverse change in the significance of a unique archaeological or paleontological resource or site or unique geologic feature, since Best Management Practices (BMPs) would be implemented and effects on these resource areas would be temporary, the proposed Basin Plan amendment would have **less-than-significant impact** on cultural resources in the Los Angeles Region.

Would the project:

Potentially Significant Impact      Less Than Significant With Mitigation Incorporated      Less Than Significant Impact      No Impact

a) Cause a substantial adverse change in the significance of a

historical resource as defined in § 15064.5?

- |  |                          |                          |                                     |                          |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Cause a substantial adverse change in the significance of an archaeological resource as defined in § 15064.5?                     | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?                              | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| d) Disturb any human remains, including those interred outside of formal cemeteries?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code § 21074? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

### 9.6. Geology and Soils

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not involve any action that would expose people or structures to the risk of loss, injury, or death involving a known earthquake fault, strong seismic ground shaking, seismic related ground failure, or landslides.

While a construction project may trigger ground shaking, particularly if the project site is located in a seismically active area, as is the case throughout the Southern California region. If a construction project were necessary, there is potential for significant ground shaking during a strong seismic event on active regional faults in the southern California area. Similarly, there is a possibility of liquefaction and landslide happening due to seismic process. Construction can also increase soil erosion, unstable soil, or expansive soil. However, since each city must implement General Plan Safety Element as required by State Law and Best Management Practices (BMPs) to protect people from unreasonable risks associated with disasters, including earthquakes, floods, fires, landslides, and other hazards, the proposed Basin Plan amendment would have **less-than-significant impact** on geology and soils in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
--------------------	--------------------------------	--	------------------------------	-----------

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soils, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### 9.7. Greenhouse Gas Emissions

The proposed project would establish ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. There are many species of nitrogen (e.g., nitrite, nitrate) that become the precursor for greenhouse gas emission, including ammonia. With the help of different types of bacteria (e.g., nitrification, denitrification) and multiple steps of conversion, ammonia can be converted to nitrous oxide, a potent greenhouse gas when microbes are not able to fully convert nitrate to nitrogen gas. Currently, the denitrification of nitrate to nitrous oxide along its course in water ecosystems is considered the single largest source of uncertainty in nitrous oxide inventory. However, because ammonia itself is very reactive and short-lived in the atmosphere, while there is uncertainty in the nitrous oxide inventory, the global warming potential of ammonia is negligible. The proposed Basin Plan amendment would have **less-than-significant impact** on greenhouse gas emission in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

purpose of reducing the emissions of greenhouse gases?

### 9.8. Hazards and Hazardous Materials

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. No changes to physical facilities or operations at most wastewater treatment plants are expected.

If construction was necessary, there would be potential increase in environmental exposure to hazardous materials (e.g., fuels, oils, lubricants, etc.) that are associated with transportation of workers, equipment, and supplies to and from the site, and operation of equipment on-site during the construction period. However, since construction BMPs would be implemented to minimize exposure to hazards and hazardous materials, the proposed Basin Plan amendment would have **less-than-significant impact** on current or potential hazards or hazardous materials. Furthermore, the environmental effects of the construction and operation of the necessary distribution facilities would only be temporary and have already been the subject of other CEQA review.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard for people residing or working in the project area?

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

### 9.9. Hydrology and Water Quality

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not affect erosion or siltation rates, existing drainage pattern of the site or area, or the amount of area runoff. The proposed project would not change the 100-year flood magnitude or route, expose people or structures to significant risk of loss, injury, or death involving flooding, or increase the potential for inundation by seiche, tsunami, or mudflow. Therefore, the proposed Basin Plan amendment would have **no impact** on hydrology of the water bodies in the Los Angeles Region.

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. Therefore, the project is expected to affect water quality. However, the proposed objectives were developed in recognition of sensitive organisms that are not adequately protected under the current ammonia objectives. Therefore, the proposed Basin Plan amendment would have **less-than-significant impacts** to water quality in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- |   |                          |                          |                                     |                                     |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| f) Otherwise substantially degrade water quality?   | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| i) Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| j) Inundation by seiche, tsunami, or mudflow?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

## 9.10. Land Use and Planning

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not involve any action, physical activity, or land use change that would divide any established community, conflict with any land use plan, policy or regulation, or conflict with any habitat conservation plan or natural community plan. Therefore, the proposed Basin Plan amendment would have **no impact** on land use and planning in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 9.11. Mineral Resources

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not involve any action or physical activity that would result in the loss of any known mineral resource or known mineral resource site. Therefore, the proposed Basin Plan amendment would have **no impact** on mineral resources in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## 9.12. Noise

The proposed project would establish ammonia objectives for the Los Angeles Region through approval of the proposed Basin Plan amendment to protect aquatic life beneficial uses. The project would not involve any action or physical activity (e.g., construction) that would result in increased noise levels or exposure of people to noise.

If construction were necessary, there would be potential noise from the construction site and from transportation/traffic associated with transportation of workers, equipment, and supplies to and from the site, and operation of equipment on-site during the construction period. These transportation and construction activities would temporarily increase local traffic and noise levels, particularly within several miles of the plant site. However, since construction BMPs would be implemented to minimize air quality, noise, and transportation/traffic impacts and because effects on these resource areas would be temporary, construction-related impacts to air quality, noise, and transportation/traffic, the proposed Basin Plan amendment would have **less-than-significant impact** on noise in the Los Angeles Region.

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to, or generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to, or generation of, excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing in or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

people residing in or working in the project area to excessive noise levels?

### 9.13. Population and Housing

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The immigration of people to an area is typically influenced by such factors as job opportunities, affordable housing, quality schools and public services, and aesthetic quality, among others. Updated ammonia objectives will not likely encourage or discourage people from moving to the Los Angeles area. Also, since the project involves no action or physical activity associated with land conversions, no housing would need to be relocated or otherwise be affected. Therefore, the proposed Basin Plan amendment would have **no impact** on population and housing in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 9.14. Public Services

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not involve any action that would adversely affect fire protection, police protection, schools, parks, or any other public facility. Therefore, the proposed Basin Plan amendment would have **no impact** on public services in the Los Angeles Region.

Would the project impact any of the following public services:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 9.15. Recreation

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. Approval and implementation of the project is expected to continue to protect commercially and recreationally important salmonids and their ELS, as well as other fish species and organisms such as invertebrates that support biodiverse and healthy river system. Therefore, the project is expected to have **no impact** on recreation in or along the water bodies in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 9.16. Transportation/Traffic

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not involve any action that would affect amounts of traffic or congestion, road management, traffic patterns, traffic hazards, emergency access, parking, or current transportation policies. Therefore, the proposed Basin Plan amendment would have **no impact** on transportation or traffic in the Los Angeles Region.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

e) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 9.17. Utilities and Service System

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not involve any action that would affect the current regulations or utilities or the need for new utilities. Therefore, the proposed Basin Plan amendment would have **no impact** on utilities and service systems.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental impacts?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 9.18. Tribal Cultural Resources

The proposed project would update ammonia objectives for the Los Angeles Region to protect aquatic life beneficial uses. The project would not cause substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe involve any action that would affect the current regulations or utilities or the need for new utilities. Therefore, the proposed Basin Plan amendment would have **no impact** on Tribal Cultural Resources.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 9.19. Mandatory Findings of Significance

Because there would be no significant Project or cumulative impacts, no mandatory findings of significance are required.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to degrade the 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects that will cause substantial diverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 10. Cumulative Impact Analysis of the Project

Cumulative impacts refer to one or more individual effects which, when taken together, could compound or increase other environmental impacts. Such effects result from the incremental impact of a project when added to other closely related past, present, and reasonably foreseeable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. Like the proposed objectives for ammonia, Los Angeles Water Board staff are currently reviewing its recommendations for a Basin Plan amendment to update temperature objectives in the Los Angeles Region. The proposed temperature objectives would be developed to protect and maintain aquatic biological resources and other beneficial uses. While temperature can be a challenge to comply with the proposed ammonia objectives in some water body reaches, additional time would be needed to develop the temperature objectives. With the N/DN treatment process, which is considered part of the baseline or current conditions and the possibility of adopting new technology to remove ammonia, there are no circumstances that can reasonably be forecasted for the unique combination of environmental conditions in the affected area under which ammonia objectives would

collectively cause a significant adverse cumulative impact to aquatic life or any other environmental resources in the Los Angeles Region.