ADDENDUM TO THE SUBSTITUTE ENVIRONMENTAL DOCUMENTS FOR THE REVOLON SLOUGH AND BEARDSLEY WASH TRASH TMDL AND MALIBU CREEK WATERSHED TRASH TMDL

Project Title: Amendments to the Water Quality Control Plan for the Los Angeles Region to Revise the Total Maximum Daily Loads (TMDL) for Trash in Revolon Slough/Beardsley Wash and the Malibu Creek Watershed

I. INTRODUCTION

The California Regional Water Quality Control Board, Los Angeles Region (Los Angeles Water Board) is the Lead Agency for evaluating the environmental impacts of proposed amendments to the *Water Quality Control Plan - Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties* (Basin Plan). On June 7, 2007 and May 1, 2008, the Los Angeles Water Board established the Revolon Slough and Beardsley Wash Trash TMDL (Resolution No. R07-007) and the Malibu Creek Watershed Trash TMDL (Resolution No. R08-007), respectively. In establishing these TMDLs, the Los Angeles Water Board previously prepared "substitute environmental documentation" for each TMDL pursuant to Title 23, California Code of Regulations, sections 3775 *et seq*., and Public Resources Code section 21159. That documentation for each TMDL contained the required environmental documentation under the State Water Resources Control Board's California Environmental Quality Act (CEQA) regulations. (Cal. Code Regs., tit. 23, §§ 3777, 3779.5.)

On April 7, 2015, the State Water Board adopted Resolution 2015-0019, which approved an "Amendment to the Water Quality Control Plan for Ocean Waters of California to Control Trash" and "Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries" (Trash Amendments).

The proposed project is adoption of Basin Plan amendments that would revise the Revolon Slough/Beardsley Wash and Malibu Creek Watershed trash TMDLs programs of implementation for the waste load allocations assigned to municipal separate storm sewer system (MS4) discharges to align the full capture system compliance approach with the State Water Board's Trash Amendments. For MS4 permittees employing the full capture system approach, the currently effective TMDLs require that all storm drains are addressed with full capture systems, while the Trash Amendments require MS4 permittees to address storm drains in high trash generation, or priority land use, areas only.

The Los Angeles Water Board has prepared this Addendum to its previously prepared Substitute Environmental Documents (SEDs) for the Revolon Slough and Beardsley Wash Trash TMDL and the Malibu Creek Watershed Trash TMDL in accordance with California Code of Regulations,

title 14, section 15164 to take into account the revisions to the TMDLs. None of the revisions to the TMDLs will result in any new significant environmental effects or in a substantial increase in the severity of the prior impacts disclosed in the prior SEDs. Further, there are no changes in circumstances or new information that would otherwise warrant any subsequent or supplemental environmental review under Public Resources Code section 21166 or CEQA Guidelines sections 15162 or 15163. The Los Angeles Water Board has therefore determined that the prior SEDs adequately address the potential environmental impacts of the TMDLs, as revised, and no further environmental review is necessary.

II. BACKGROUND

On June 7, 2007 and May 1, 2008, the Los Angeles Water Board established the Revolon Slough and Beardsley Wash Trash TMDL (Resolution No. R07-007) and the Malibu Creek Watershed Trash TMDL (Resolution No. R08-007), respectively. Each TMDL was subsequently approved by the State Water Board, the Office of Administrative Law, and the United States Environmental Protection Agency, and thereafter became effective. The Los Angeles Water Board's purpose in establishing the TMDLs was to address water quality impairments due to trash and restore the aquatic life, wildlife, recreational, and fishing beneficial uses of the waterbodies in the respective watersheds.

The 2007 Revolon Slough and Beardsley Wash Trash TMDL addressed impairments of water quality caused by trash in Revolon Slough and Beardsley Wash, which is located in a subwatershed of the Calleguas Creek Watershed in eastern Ventura County and drain to Mugu Lagoon. Revolon Slough starts as Beardsley Wash at the Camarillo Hills and becomes Revolon Slough in the Oxnard Plain. The wash flows through mostly residential neighborhoods and agricultural areas. Revolon Slough flows into Mugu Lagoon in a channel that runs parallel to Calleguas Creek near the Pacific Coast Highway.

The 2008 Malibu Creek Watershed Trash TMDL addressed impairments of water quality caused by trash in the waterbodies of the Malibu Creek Watershed, which is located within both Ventura County and Los Angeles County and has a drainage area of 109 square miles. Tributaries of Malibu Creek include Lindero Canyon Creek, Medea Creek, Palo Comado Canyon Creek, Cheeseboro Canyon Creek, Las Virgenes Creek, Hidden Valley Creek, Potrero Valley Creek, Triunfo Creek, and Cold Creek. The dominant land use in the Malibu Creek Watershed is open space, accounting for approximately 82.7% of the watershed. Other land uses include agriculture, recreation, residential, commercial, and industrial land uses.

The currently effective TMDLs established a numeric target of zero trash based on the narrative water quality objectives for "Floating Material" and "Solid, Suspended, or Settleable Materials" specified in the Basin Plan. The TMDLs assign waste load allocations (WLAs) to discharges from the municipal separate storm sewer system (MS4) within the respective watersheds. The TMDLs allow MS4 permittees to comply with WLAs through several approaches. If MS4 permittees choose to comply with WLAs via the full capture system[1] approach, then they are required to

[1] A full capture system consists of any device or series of devices that traps all particles that are 5 mm or greater and has a design treatment capacity of not less than the peak flow rate resulting from a one-year, one-hour, storm in the area draining to the device(s).

install full capture devices addressing all MS4 discharges from their jurisdictions. The TMDLs allow eight years for MS4 permittees to complete installation of full capture devices. The currently effective TMDLs also assign load allocations (LAs) to nonpoint source discharges of trash. Nonpoint source responsible entities can comply with LAs by implementing a Minimum Frequency of Assessment and Collection/Best Management Practice (MFAC/BMP) Program. The TMDLs require that the MFAC/BMP Program include an initial minimum frequency of trash assessment and collection and suite of structural and/or nonstructural BMPs to progressively reduce trash from accumulating between collection events.

On April 7, 2015, the State Water Board adopted Resolution 2015-0019, which approved an "Amendment to the Water Quality Control Plan for Ocean Waters of California to Control Trash" and "Part 1 Trash Provisions of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries" (Trash Amendments). The State Water Board developed the Trash Amendments to provide statewide consistency for the regional water boards' regulatory approaches to reduce trash and protect aquatic life and public health beneficial uses in state waters across California not previously addressed by trash TMDLs, while focusing resources on high-trash generating areas. The Trash Amendments require MS4 permittees to comply via one of two tracks. If MS4 permittees choose the full capture system track, then they are required to install full capture systems for all storm drains that capture runoff from the priority land uses in their jurisdictions. The Trash Amendments define priority land uses as high density residential, industrial, commercial, mixed urban, and public transportation station land uses.

The Trash Amendments became effective on December 2, 2015 and apply to all surface waters of the State, with the exception of those waters within the jurisdiction of the Los Angeles Water Board where trash or debris TMDLs were in effect prior to the effective date of the Trash Amendments. The Trash Amendments directed the Los Angeles Water Board to convene a public meeting within a year of the effective date of the Trash Amendments to reconsider the scope of its trash TMDLs, with the exception of those TMDLs for the Los Angeles River and Ballona Creek watersheds, to particularly consider an approach that would focus MS4 permittees' trash-control efforts on high-trash generation areas within their jurisdictions.

On November 28, 2016, the Los Angeles Water Board held a public meeting to reconsider the scope of certain Board-adopted trash TMDLs, including the 2007 Revolon Slough/Beardsley Wash Trash TMDL and the 2008 Malibu Creek Watershed Trash TMDL, to particularly consult with the public in considering an approach that would focus MS4 permittees trash control efforts in high trash generation areas within their jurisdictions.

III. PROJECT DESCRIPTION

The proposed project that is the subject of this Addendum consists of Basin Plan amendments to revise the Revolon Slough/Beardsley Wash and Malibu Creek watersheds trash TMDLs' programs of implementation for the WLAs assigned to MS4 discharges to align the full capture system compliance approach with the State Water Board's Trash Amendments. The currently effective TMDLs require MS4 permittees to address ***all*** storm drains with full capture systems, while the statewide Trash Amendments require MS4 permittees to address storm drains ***in priority land use***

areas only. Therefore, the proposed project amounts to a reduction in the amount of full capture systems installed in the respective watersheds.

The proposed project does not make changes to the fundamental technical elements of the TMDLs. The Numeric Targets, Loading Capacity, WLAs and Load Allocations, Margin of Safety, and Critical Condition and Seasonal Variation have not been significantly changed. Neither are there significant changes proposed to the overarching compliance options identified in the TMDLs, namely the use of full capture systems, partial capture devices, and institutional controls. The changes to the TMDLs align with the Trash Amendments, while ensuring protection of the beneficial uses of Revolon Slough/Beardsley Wash and waterbodies in the Malibu Creek watershed.

IV. CEQA STATUTORY AND REGULATORY BACKGROUND

Pursuant to Public Resources Code section 21080.5, the Secretary of the Resources Agency has certified the State and Regional Water Boards' 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); California Code of Regulations, Title 23, section 3782). As amendments to the Basin Plan are part of the basin planning process, the environmental information developed for and included with the amendments are considered a substitute to an initial study, negative declaration, and/or environmental impact report. The "certified regulatory program" of the Water Boards, however, must satisfy the requirements of California Code of Regulations, Title 23, section 3777(a), which requires a written report, containing an environmental analysis of the project, and an environmental checklist as part of its substitute environmental documents (SEDs). The Los Angeles Water Board's substantive obligations when adopting Basin Plan amendments are also described in Public Resources Code section 21159. Section 21159, which allows expedited environmental review for environmental 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 environmental impacts of the methods of compliance, reasonably foreseeable feasible mitigation measures, and reasonably foreseeable alternative means of compliance with the rule or regulation.

The Los Angeles Water Board previously prepared "substitute environmental documentation" for the establishment of the 2007 Revolon Slough and Beardsley Wash Trash TMDL (Resolution No. R07-007) and the 2008 Malibu Creek Watershed Trash TMDL (Resolution No. R08-007) pursuant to Title 23, California Code of Regulations, sections 3775 *et seq.*, and Public Resources Code section 21159.[2] That documentation for each TMDL contained the required environmental documentation under the State Water Board's CEQA regulations. (Cal. Code Regs., tit. 23, §§ 3777, 3779.5.) In preparing the previous substitute environmental documentation, the Los Angeles Water Board considered the requirements of Public Resources Code section 21159 and California

[2] Pursuant to Title 23, California Code of Regulations, section 3779.5(b), final substitute environmental documentation includes the materials described in section 3777 (i.e., written report containing an environmental analysis and a completed environmental checklist), comments and responses to comments pursuant to section 3779, the board resolution adopting the project, and other documentation as the board prescribes.

Code of Regulations, Title 14, section 15187, and intended those documents to serve as a tier 1 environmental review. The previous substitute environmental documentation contained significant environmental analysis and numerous findings related to the reasonably foreseeable methods of compliance, the impacts of the methods of compliance, feasible mitigation measures, and alternative means of compliance. Those documents were filed with the Resources Agency on March 21, 2008 and August 11, 2009 for the 2007 Revolon Slough and Beardsley Wash Trash TMDL and 2008 Malibu Creek Watershed Trash TMDL, respectively.

The Los Angeles Water Board provided a variety of opportunities for early public consultation on the initial TMDLs and the proposed revisions to these two TMDLs. The Los Angeles Water Board held scoping meetings on December 5, 2006 for the Revolon Slough/Beardsley Wash Trash TMDL and on December 13, 2007 for the Malibu Creek Watershed Trash TMDL. These meetings are documented in Resolution Nos. R2007-007 and R2008-007, respectively, as well as in the administrative records for the two TMDLs. In addition, the Los Angeles Water Board held a public meeting on November 28, 2016 to seek early input on its reconsideration of the scope of these two trash TMDLs and other trash TMDLs in the region.

When a CEQA environmental document has been adopted for a project, no subsequent or supplemental environmental document is required by the lead agency unless, "on the basis of substantial evidence in the light of the whole record," the agency determines one or more of the following:

(1) Substantial changes are proposed in the project which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was adopted shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous environmental document;

(B) Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental document would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

(Cal. Code Regs., tit. 14, §§ 15162(a)(1)-(3), 15163; *see also* Pub. Res. Code, § 21166.)

If a subsequent environmental document is not required, the lead agency may document its decision and supporting evidence in an addendum to the environmental document. (Cal. Code Regs., tit. 14, § 15164(e).) An addendum is appropriate if minor technical changes or modifications to the proposed project occur, and only if the minor technical changes or modifications do not result in any new significant impacts or substantially increase the severity of previously identified significant impacts. (*Id*., § 15164(a)-(b)). The addendum and lead agency's findings should include a "brief explanation of the decision not to prepare a subsequent [environmental document]," and the explanation "must be supported by substantial evidence." (*Id*., § 15164(e).) An addendum need not be circulated for public review; however, an addendum is to be considered by the lead agency long with the previously-adopted environmental document prior to making a decision on the project. (*Id*., § 15164(c)-(d).)

This Addendum is prepared as an addition to the previously adopted Substitute Environmental Documents (SEDs) for the Revolon Slough and Beardsley Wash Trash TMDL (approved June 7, 2007) and the Malibu Creek Watershed Trash TMDL (approved May 1, 2008) in accordance with California Code of Regulations, title 14, section 15164 to take into account the revisions to the TMDLs. This Addendum demonstrates that none of the revisions to the TMDLs will result in any new significant environmental effects or in a substantial increase in the severity of the prior impacts disclosed in the prior SEDs. Further, there are no changes in circumstances or new information that would otherwise warrant any subsequent or supplemental environmental review under Public Resources Code section 21166 or CEQA Guidelines sections 15162 or 15163. This Addendum, therefore, supports the finding that the prior SEDs adequately address the potential environmental impacts of the TMDLs, as revised, and no further environmental review is necessary.

V. ENVIRONMENTAL SETTING AND BASELINE CONDITIONS

The prior establishment of the 2007 Revolon Slough and Beardsley Wash TMDL and the 2008 Malibu Creek Watershed Trash TMDL serve as the baseline for CEQA analysis of the proposed project. As described in Section IV. above, the Los Angeles Water Board previously prepared SEDs for each TMDL pursuant to Title 23, California Code of Regulations, sections 3775 *et seq*., and Public Resources Code section 21159. Those SEDs contained significant environmental analysis and numerous findings related to the reasonably foreseeable environmental impacts of the methods of compliance (Pub. Res. Code § 21159(a)(1)), reasonably foreseeable mitigation measures (*Id*., § 21159(a)(2)), reasonably foreseeable alternative means of compliance (*Id*., §

21159(a)(3)), and a reasonable range of environmental, economic, and technical factors; population and geographic areas; and specific sites (*Id*., § 21151(c)).

As established in the final SEDs for the TMDLs, MS4 permittees will employ structural and non-structural implementation strategies to attain WLAs. The previous SEDs for the prior establishment of the TMDLs considered the potential impacts due to the installation and maintenance of full capture systems and other structural and non-structural trash control measures. While the currently effective TMDLs require MS4 permittees to address all storm drains with full capture systems, the Los Angeles Water Board has determined that revising the TMDLs to require full capture systems in only the priority land use areas will fully address all of the trash discharged in the watershed as long as MFAC/BMP programs remain in place in the impaired waters.

The proposed revisions to the TMDL programs of implementation for the WLAs assigned to MS4 discharges to require full capture systems in only the priority land use areas could allow for increased levels of trash to be discharged from non-priority land uses within the MS4 that are not addressed by full capture systems. The analysis in this Addendum for the proposed amendments focuses on the potential environmental impacts arising from potentially increased levels of trash discharged from non-priority land uses. Compliance with these amendments will not require additional structural or non-structural treatment strategies, new technologies or new or expanded facilities from those required to achieve the existing TMDLs.

Therefore, the existing TMDLs serve as the baseline from which to analyze the significance of impacts posed by the proposed project. Because the proposed amendments are limited to the revision of the TMDL programs of implementation for the WLAs assigned to MS4 discharges, and do not require any additional treatment strategies or facilities, all compliance options are established within the baseline and no additional analysis of the potential impacts due to compliance with the TMDLs is required with the exception of the reduction in the number of full capture systems to be installed.

VI. ANALYSIS

A. Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project:

☑ Aesthetics	□ Agriculture & Forestry Resources	□ Air Quality
☑ Biological Resources	□ Cultural Resources	□ Geology/Soils
□ Greenhouse Gas Emissions	□ Hazards/Hazardous Materials	☑ Hydrology/Water Quality
□ Land Use/Planning	□ Mineral Resources	□ Noise
□ Population/Housing	□ Public Services	□ Recreation
□ Transportation/Traffic	□Utilities/Service Systems	□ Mandatory Findings of Significance

Aesthetics, Biological Resources, and Hydrology/Water Quality are the only environmental factors potentially affected by this proposed project because they are the only factors potentially affected by the reduction in the number of full capture systems installed under the revised TMDLs. The other environmental factors potentially affected by the installation and maintenance of various structural (e.g., catch basin inserts, vortex separation systems, trash nets, and Gross Solids Removal Devices) and non-structural (e.g., enforcement of litter laws, street sweeping, storm drain cleaning, public education, and ordinances) trash control measures were previously analyzed as part of the SEDs for the currently effective TMDLs (Resolution Nos. R07-007 and R08-007) and the SED for the statewide Trash Amendments (Resolution No. 2015-0019).

B. Environmental Checklist

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
AESTHETICS Would the project:				
a. Have a substantial adverse effect on a scenic vista?				X
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c. Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X
BIOLOGICAL RESOURCES Would the project:				
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			x	

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
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 California Department of Fish and Game or US Fish and Wildlife Service?			x	
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal, pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				x
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?				x
HYDROLOGY AND WATER QUALITY				

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements?			x	
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)?				x
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?				x
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?				x
e. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?				x

	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
f. Otherwise substantially degrade water quality?				x
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?				x
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				x
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?				x
j. Inundation by seiche, tsunami, or mudflow?				x

C. Discussion of Environmental Checklist

1. Aesthetics

Would the project
c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less than significant Impact

As described in the technical report for the proposed project, there is a potential for non-priority land use areas to discharge trash; however, there are MFAC/BMP programs in the impaired waters downstream that collect any discharged trash before it can harm beneficial uses in the receiving waters. Under the proposed project, the number of catch basins ultimately addressed with full capture devices will decrease by approximately two-thirds. There are approximately 1,900 catch basins in the Revolon Slough/Beardsley Wash watershed and about 1,040 of those are within non-priority land use areas. There are approximately 4,960 catch basins in the Malibu Creek watershed and about 3,570 of those are within non-priority land use areas. The additional trash discharged from these non-priority land use areas could have a negative impact on aesthetics by substantially degrading the existing visual character or quality of the site and its surroundings if trash were to

accumulate in the receiving waters downstream. However, the TMDLs include MFAC/BMP programs in the impaired waters downstream of the non-priority land use areas, which involve collecting trash at regular frequencies in order to prevent trash from accumulating in amounts that could degrade the visual character or quality of the waterbodies. The TMDLs require assessments and collections ranging from weekly to monthly in addition to regular clean ups and BMP implementation to reduce the amount of trash that accumulates between collection events. Thus, as long as MFAC/BMP programs remain in place in the impaired waters downstream, revising the TMDLs to require full capture systems in only the priority land use areas will fully address the trash discharged from the MS4s and, therefore, will result in a less than significant impact to aesthetics.

2. Biological Resources

Would the project

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 Game or U.S. Fish and Wildlife Service?*
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 California Department of Fish and Game or US Fish and Wildlife Service?*
c. *Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the 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 wildlife corridors, or impede the use of native wildlife nursery sites?*

Less than significant Impact

As described in the technical report for the proposed project, there is a potential for non-priority land use areas to discharge trash; however, there are MFAC/BMP programs in the impaired waters downstream that involve collection of any discharged trash before it can harm beneficial uses in the receiving waters. Under the proposed project, the number of catch basins ultimately addressed with full capture devices will decrease by approximately two-thirds. There are approximately 1,900 catch basins in the Revolon Slough/Beardsley Wash watershed and about 1,040 of those are within non-priority land use areas. There are approximately 4,960 catch basins in the Malibu Creek watershed and about 3,570 of those are within non-priority land use areas. The additional trash discharged from these non-priority land use areas could have a negative impact on candidate, sensitive, or special status species; riparian habitat; federally protected wetlands; or the movement of native resident or migratory fish or wildlife species if trash were to accumulate in the receiving waters downstream. However, the TMDLs include MFAC/BMP programs in the impaired waters downstream of the non-priority land use areas, which involve collection of trash at regular frequencies in order to prevent trash from accumulating in amounts that could adversely impact biological resources. The TMDLs require assessments and collections ranging from weekly to monthly in addition to regular clean ups and BMP implementation to reduce the amount of trash

that accumulates between collection events. Thus, as long as MFAC/BMP programs remain in place in the impaired waters downstream, revising the TMDLs to require full capture systems in only the priority land use areas will fully address the trash discharged from the MS4s and, therefore, will result in a less than significant impact to biological resources.

3. Hydrology and Water Quality

Would the project
a. Violate any water quality standards or waste discharge requirements?

Less than significant Impact

As described in the technical report for the proposed project, there is a potential for non-priority land use areas to discharge trash; however, there are MFAC/BMP programs in the impaired waters downstream that involve collection of any discharged trash before it can harm beneficial uses in the receiving waters. Under the proposed project, the number of catch basins ultimately addressed with full capture devices will decrease by approximately two-thirds. There are approximately 1,900 catch basins in the Revolon Slough/Beardsley Wash watershed and about 1,040 of those are within non-priority land use areas. There are approximately 4,960 catch basins in the Malibu Creek watershed and about 3,570 of those are within non-priority land use areas. The additional trash discharged from these non-priority land use areas could violate water quality standards if trash were to accumulate in the receiving waters downstream. However, the TMDLs include MFAC/BMP programs in the impaired waters downstream of the non-priority land use areas, which involve collection of trash at regular frequencies in order to prevent trash from accumulating in amounts that could cause an exceedance of the TMDLs' zero trash numeric target. The TMDLs require assessments and collections ranging from weekly to monthly in addition to regular clean ups and BMP implementation to reduce the amount of trash that accumulates between collection events. Thus, as long as MFAC/BMP programs remain in place in the impaired waters downstream, revising the TMDLs to require full capture systems in only the priority land use areas will fully address the trash discharged from the MS4s and, therefore, will result in a less than significant impact to hydrology and water quality.

D. Summary and Findings

Review of the proposed project has concluded that the project will not result in new significant environmental impacts beyond those analyzed in the prior SEDs for the initial establishment of the TMDLs. The TMDL revisions do not alter the environmental analysis that was previously prepared for the establishment of the TMDLs because the TMDL revisions will not result in different implementation actions than those previously analyzed, or different effects upon the environment. Because the proposed project is limited to the revision of the TMDLs' programs of implementation for WLAs assigned to MS4 discharges, and does not require any additional trash control measures, all compliance options are established within the baseline and no additional environmental analysis of the potential impacts due to compliance with the TMDLs are required. Since MS4 permittees will be required to address storm drains in high trash generation, or priority land use, areas only, the proposed project amounts to a reduction in the number of full capture systems to be installed in the watersheds. A reduction in the number of full capture systems could allow for increased

levels of trash to be discharged from non-priority land uses. However, the Los Angeles Water Board has determined that revising the TMDLs to require full capture systems in only the priority land use areas, consistent with the Trash Amendments, will fully address all of the trash discharged from the MS4 in the watersheds as long as an effective MFAC/BMP program remains in place in the impaired waters downstream.

The Los Angeles Water Board has determined that an Addendum is the appropriate CEQA environmental document for its approval of the Basin Plan amendments to revise the trash TMDLs for Revolon Slough/Beardsley Wash and Malibu Creek Watershed. None of the conditions described in Title 14, California Code of Regulations, section 15162 calling for preparation of a subsequent environmental document, or section 15163 calling for a supplemental environmental document, have occurred, and thus an Addendum to the prior SEDs for the TMDLs is appropriate to satisfy CEQA requirements for the proposed project. The minor technical changes or additions to the SEDs made by this Addendum do not raise important new issues about the significant effects on the environment and would not trigger the need for further environmental review. This Addendum finds that the TMDL revisions will not result in any new significant environmental effects, a substantial increase in the severity of previously identified significant effects, or mitigation measures or alternatives that are considerably different from those analyzed in the previous SEDs.

VII. CONCLUSION

The revision of the Revolon Slough/Beardsley Wash and Malibu Creek Watershed trash TMDLs will fully address all of the trash discharged from the MS4s in the watersheds as long as the MFAC/BMP programs remain in place in the impaired waters downstream. The changes to the TMDLs align with the scope of the statewide Trash Amendments, while ensuring protection of the beneficial uses in the Revolon Slough/Beardsley Wash and Malibu Creek watersheds. Through this Addendum, the Los Angeles Water Board has determined that no subsequent or supplemental environmental documentation is required for the proposed project.