

PLOO will be diluted to background levels by the time the wastefield approaches any of these protected areas.

3. Endangered or Threatened Species

A 301(h)-modified permit shall not be issued where such issuance would conflict with the federal Endangered Species Act, as amended. This law is administered by the U.S. Fish and Wildlife Service and the NOAA National Marine Fisheries Service (collectively, the Services).

According to the applicant, 24 listed and candidate species may occur in the vicinity of Point Loma. Operation of the PLOO could affect these species by altering physical, chemical, or biological conditions, including: habitat suitability, water quality, biological integrity, food web dynamics, or the health of organisms. However, long-term monitoring conducted by the City shows no evidence of significant effects from operation of the PLOO on environmental conditions or biological communities. The applicant has reported to the Services that maintaining the existing discharge through the PLOO should not have an adverse impact on listed species or threaten their critical habitat.

By letters dated October 29, 2007, the applicant has requested determinations by the Services that the modified discharge is consistent with the federal Endangered Species Act. The issuance of a 301(h)-modified permit for the Point Loma WTP discharge is contingent upon determinations by the Services.

4. Fishery Conservation and Management

A 301(h)-modified permit shall not be issued where such issuance would conflict with the federal Magnuson-Stevens Fishery Conservation and Management Act, as amended (the MSA).

According to the applicant, the marine environment in the vicinity of Point Loma supports a wide variety of commercial fisheries that are protected and managed through the "Essential Fish Habitat" provisions of the MSA. The fisheries management plans (FMPs) for species that could occur in the Point Loma area are the Pacific Groundfish FMP (83 species), the Coastal Pelagic Species FMP (6 species), and the U.S. West Coast Fisheries for Highly Migratory Species (13 species). According to the applicant, the PLOO could have two types of effects on fisheries: physical impacts associated with the presence of the pipeline and diffusers on the ocean bottom, and biological impacts associated with the discharge of treated wastewater. Based on long-term monitoring results, the applicant has reported to the National Marine Fisheries Service that maintaining the existing discharge through the PLOO should not have an adverse effect on Essential Fish Habitat or Managed Species.

By letter dated October 29, 2007, the applicant has requested a determination by the National Marine Fisheries Service that the modified discharge is consistent with the

Magnuson-Stevens Fishery Conservation and Management Act. The issuance of a 301(h)-modified permit for the Point Loma WTP discharge is contingent upon the NMFS' determination.

J. State Determination and Concurrence

In accordance with 40 CFR 125.59(i)(2), no 301(h)-modified permit shall be issued until the appropriate State certification/concurrence is granted or waived, or if the State denies certification/concurrence, pursuant to 40 CFR 124.54.

The PLOO discharges beyond the 3 nautical mile State waters limit, into federal waters. Therefore, EPA has primary regulatory responsibility for the discharge. However, in May 1984, a Memorandum of Understanding was signed between EPA and the State of California to jointly administer discharges that are granted 301(h) modifications from federal secondary treatment standards. Under California's Porter-Cologne Water Quality Control Act, the Regional Water Boards issue waste discharge requirements which serve as NPDES permits. The joint issuance of a 301(h)-modified NPDES permit for the Point Loma WTP discharge which incorporates both the federal 301(h) variance and State waste discharge requirements will serve as the State's concurrence, pursuant to 40 CFR 124.54.

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