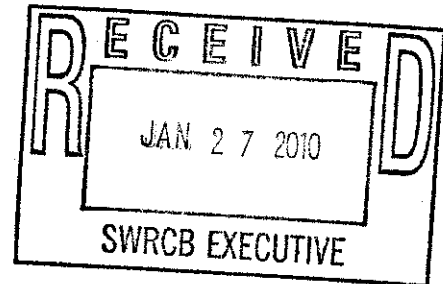


COAST ACTION GROUP, PO BOX 215, POINT ARENA, CA 95468

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: Comment Letter – Proposed CEQA Regulations

As noted in the State Board notice document on this project, Basin Plan Amendments and related environmental review (to conform to CEQA) is a Certified Regulatory Program.

Basin Planning (as a CRP) is still subject to mandates of CEQA that must be fulfilled and can not be subverted or ignored.

Such projects must fulfill the CEQA mandates that include but are not limited to: full and adequate project description, appropriate public and agency noticing requirements, recognition and discussion of project impacts or consequences - including options for discussion of mitigation of adverse consequences, appropriate consideration of project effects and related mitigations - with appropriate findings, alternatives discussion considering the legitimate full range of alternatives, consideration of professional, responsible agency, and interested party comments on a project, response to comments and discussion showing the full deliberative process.

Also, the project must go through a review of consistency with other regulatory authority - including State Water Code, State Fish and Game Code, and other State and Federal statutes (including the State and Federal ESA).

We noticed that in the new proposed regulatory changes related to CEQA compliance there are some areas where these new proposals fall short of the intent

of CEQA to encourage public participation and fully incorporate the intended informed decision making process.

Public Notice: The proposal does not fully consider or allow for a good, reliable, and comprehensive method to give notice of projects to the public.

Project Review: The intent to stream line the project approval process, as proposed, does not allow for public review and comment a Basin Plan Amendment (or other projects) if the project is substantially changed by the State Board. Substantial changes, and/or the addition of substantial new information to a file, requires re-circulation of project to allow for public and responsible agency review of and such changes. Efforts in the streamlining of the approval process must recognize this and provide a format for re-circulation (this does not mean the project must return to the Regional Board for revision).

Sincerely,

Alan Levine, For Coast Action Group.