



August 30, 2010

Sent via Email

Patricia Leary, Senior Engineer
State Water Resources Control Board, Division of Financial Assistance
1001 I Street
Sacramento, CA 98814

RE: Response to SWRCB comments on the City of Trinidad Proposition 84 Areas of Special Biological Significant (ASBS) Grant for the Trinidad Head ASBS Stormwater Management Project

Dear Ms. Leary:

The letter provides a response to the August 9, 2010 letter sent to the City by the State Water Resources Control Board Division of Financial Assistance (SWRCB) requesting additional supporting project information. In addition, this letter addresses the review comments from the Area of Special Biological Significance (ASBS) Task Force.

The information presented in this letter will show:

- The proposed implementation project to infiltrate stormwater is feasible based on preliminary investigations.
- The proposed project will further define the geology and groundwater characteristics of the underlying area and thereby identify the best locations for infiltration Low Impact Development Best Management Practices (LID/BMPs) and the infiltration design capacity that is appropriate for each LID/BMP location.
- The proposed implementation project to be funded by the ASBS grant will result in reduced stormwater runoff to the ASBS, address the City's high threat discharge, improve water quality, and protect the beneficial uses of the ASBS, even with the proposed necessary division of the project into upper and lower watershed areas.
- The preliminary CEQA analysis shows there are no major environmental obstacles to implementing the project, including cultural resources. Most importantly, the preliminary CEQA analysis does not indicate the need for an EIR on this project.

This letter begins with a summary of how the stormwater project was developed and the project coordination. This is followed by a section on the project feasibility. Next information on the project scope of work is presented. A discussion of the project schedule and CEQA document follows. These sections provide the context and background of all the work that has led to this implementation project and finally direct responses are provided to the ASBS Task force comments.

Project Coordination

The Trinidad Head ASBS Stormwater Management Improvement Project was developed as part of the Trinidad-Westhaven Integrated Coastal Watershed Management Plan (ICWMP) to address water quality issues in the ASBS. The ICWMP was funded by a State Water Resources Control Board (SWRCB), Proposition 50, Chapter 8, Integrated Regional Water Management Planning Grant. The plan was adopted by the City of Trinidad on June 11, 2008. There was significant stakeholder involvement during the development of the ICWMP. A list of all the stakeholders involved with the development of the ICWMP is included as Attachment 1, and is taken directly from Chapter 13 of the ICWMP. Both California State Parks and California Department of Fish and Game as well as private citizens participated in the community outreach meetings.

In addition, the ASBS area is included as part of the Trinidad Head Pilot Critical Coastal Area (CCA) Program, one of only five areas selected for this program across the state. The state agency advisors for the Trinidad Pilot CCA include the California Coastal Commission, North Coast Regional Water Quality Control Board, State Water Resources Control Board--NPS Program, State Water Resources Control Board--Ocean Unit, California Department of Health Services, California State Parks, California Department of Fish and Game, Caltrans, California Department of Forestry & Fire Protection, and California Coastal Conservancy.

The Trinidad CCA state advisors are members of the Trinidad ICWMP team, and participated in numerous ICWMP stakeholder team meetings. The CCA state advisors provided technical assistance for the project, helped to focus the attention of responsible agencies, and coordinated with other relevant water quality protection programs to help guide development of the Trinidad ICWMP and the proposed stormwater improvement project. The CCA state agency representatives, including State Parks and CDFG, will be called upon for their expertise and guidance.

As part of this project, the stakeholder and public outreach will continue. California State Parks, and California Department of Fish and Game, as well as other stakeholders and private citizens will continue to be invited and will participate in the community outreach meetings as the project evolves.

Project Feasibility

Beyond the City's desire to protect the Kelp Beds at Trinidad Head ASBS, improve water quality, and reduce bacterial contamination at area beaches, the City of Trinidad is required to stop discharging polluted stormwater to the ASBS as defined by the constituents and thresholds outlined in the California Ocean Plan. In October 2004, the City received a letter from the State Water Resources Control Board (SWRCB) informing the City we are required to cease discharging polluted stormwater to the Trinidad Head ASBS, under the California Ocean Plan (COP) Section III.E.1. The letter also informed the City they may request an exemption to the prohibition of discharges to the ASBS, under COP Section III.I.1. The City submitted an exemption request and was informed in writing on April 30, 2007, that the exemption request was approved. This exception has allowed the City to continue discharging stormwater, while developing ways to comply with the COP requirements. This exception is time limited and there is no

guarantee that it will be extended. This project would allow the City move forward with permanent solutions that comply with the COP requirements.

While the City is operating under the exemption, the best long term solution to address the potential discharge of pollutants to the ASBS is still to eliminate discharge of stormwater from directly reaching the ASBS. As discussed above, the City of Trinidad's Proposed Stormwater Management Project was developed as a collaborative effort under the Trinidad-Westhaven ICWMP. In particular, the project resulted from the Stormwater Action Plan, which identified objectives and actions to achieve the goals in the ICWMP. Relevant Excerpts from the Stormwater Action Plan describing the project conceived by the Trinidad ICWMP team are included for reference in Attachment 2. The Stormwater Management Project was collaboratively developed and is consistent with the community's interest in modern stormwater management and "green" technologies. There are limited options available to the City to address the stormwater management as discussed below.

The City of Trinidad sits on a slope and in approximately 80% of the City area stormwater eventually drains directly to either Trinidad Bay to the South or the Pacific Ocean to the North within or immediately adjacent to the ASBS designated area. Given the topographic constraints and location of the City, options to reduce or eliminate stormwater discharges from the City to the ASBS are very limited. Due to the amount of rainfall and proximity to the ocean, options for treating stormwater to improve water quality is also limited. The basic methodology to reduce stormwater discharges to the ASBS is to redirect the discharges back into the water cycle before they discharge into Trinidad Bay. There are only a few ways to redirect the discharges back into the water cycle: evaporation/transpiration, infiltration, or discharge to surface water.

Pure evaporation is not an effective measure on the North Coast where rainfall rates exceed evaporation rates, although some minor amount of natural evaporation of rainwater will take place from the ground and any retention areas. Transpiration is part of the proposed solution through plant uptake in some of the Low Impact Development (LID) Best Management Practices (BMP) proposed for the project, including bioswales, rain gardens, and grassy swales. A large scale transpiration project such as reuse thorough irrigation is not feasible. There are no agricultural lands nearby where an irrigation project could be implemented and the area surrounding Trinidad is forested with steep slopes, which is also not conducive to an irrigation project to handle the quantity of stormwater generated. The final method to redirect stormwater back into the water cycle is through infiltration. This is the primary means the City of Trinidad has available to reduce or eliminate stormwater discharges to the ASBS, and thus, the proposed stormwater management project is to implement numerous LID BMPs to infiltrate stormwater. Discharging directly to surface water streams will not eliminate the pollutants or potential impacts to the ASBS as local surface water drains back to the ocean to the north or south of Trinidad Head and into or directly adjacent to the ASBS. This project does utilize surface water streams by redirecting small quantities of stormwater to them as feasible based on gravity flow and only after receiving treatment by various LID BMPs such as grassy swales.

The proposed stormwater management project was developed using both available data and literature as well as through field studies and stormwater monitoring. The local geology was considered in the development of the project and it is known that it is feasible to infiltrate stormwater in the area. A bibliography developed for a sub-component of the ICWMP, the "Assessment Model for Sediment Input from Geologic Processes on the Near Shore Waters at Trinidad, CA," is included as Attachment 3 to exemplify the types of information that were used in the development of the larger Stormwater Management Project. While it is known that infiltration is feasible based on the local soils and geology, it is not known how much stormwater is appropriate to safely infiltrate and at what locations, which is the reason the project scope of work includes a pre-design infiltration analysis. This is a unique and critical need for this project since the City is located on top of coastal bluffs, in a highly active seismic environment, with everyone utilizing infiltration through on-site septic systems. While stormwater infiltration is a common and accepted methodology, it may not be appropriate at all locations in the City, such as near the bluffs. Understanding the underlying geology, soils, and groundwater gradients will provide the information necessary to apply proper engineering standard of care to locate and design appropriate infiltration areas. It is not a question of whether or not infiltration works in this area, it is just a question of where it would be most appropriate.

Based on the information presented above, the City's best option to come into compliance with the requirements of the COP is through this infiltration project. A project of this type is feasible in Trinidad, follows the recommendations developed in the ICWMP Stormwater Action Plan, utilizes gravity and low technology solutions, and can safely eliminate the direct outfall to the ASBS. Additional feasibility Information is presented under CEQA considerations.

Project Phases/ Scope of Work

The SWRCB questioned the City's Scope of work as currently proposed, in regards to the current scope not assuring full implementation. A similar comment was made by the ASBS Task Force regarding the phasing of the project. Previous discussions and a site visit conveyed the logic to this approach in the past. It is a very legitimate question and the unique technical aspects of this project lend itself to a multi phased approach.

The Stormwater Management Project is very important to the City of Trinidad and neighboring areas. However, as a small rural disadvantaged community, they cannot afford to take on the costs of implementing a project of the size needed to address the COP requirements. The City has originally submitted the Stormwater Improvement project as two separate projects under the ASBS grant program which would have allowed for project implementation in both the upper and lower stormwater management areas. However, between the concept proposal stage and full proposal stage under the SWRCB ASBS Grant program, the State requested the City combine the two separate projects into one project, which reduced the total allowable grant funds from \$5 million with two projects to \$2.5 million under one project. It is unrealistic to expect the City can complete both components of the project for half the funding. It is possible and logical to break the project into two projects, or two phases. Thus, the City developed the project so that would result in immediate benefits to the ASBS when implemented and set the stage for completion of the full project.

While the City often refers to the Stormwater Management Project in terms of Phase I and Phase 2, they are really independent projects that just need to be implemented in a logical order. As stormwater obviously flows from the upper portions of the watershed to the lower portions it is logical to implement stormwater reduction projects in the upper portion of the watershed first, followed by the remaining downgradient portions second. Thus, when the City was asked to re-submit only one project to the ASBS Grant program it was the upper watershed area that was the focus. However, the subsurface into which stormwater will be infiltrated cannot as easily be separated into upper and lower watershed areas as the subsurface acts as one unit. It is possible to only study the upper watershed area, but it is not cost effective for anyone to break this predesign study into two pieces. Therefore the project as submitted proposes to evaluate the adjacent areas for the pre-design infiltration analysis. The adjacent lower watershed could be eliminated from study if it is a condition of the grant requirements, but not because this approach would be a practical solution.

It is the City's intent to complete both the upper and lower watershed area stormwater management improvement projects. These two projects will eventually work together to effectively eliminate the City's direct discharge to the ASBS. A comment was received after the concept proposal was submitted indicating the State wanted planning and design of the proposed infiltration chambers at the downstream end of the watershed included in the project. In addition, it is important to assure that Upper Watershed improvements are compatible with eventual lower watershed improvement. The scope of work as it currently stands includes design for the lower watershed area to approximately the 50% level of design, based in part on the project needs and at the request of the State. The City is willing to discuss with the state modifying the scope of work to include 10 to 30% conceptual design for the lower watershed area, or eliminating the adjacent lower watershed from study. The adjacent lower watershed could be eliminated from study if it is a condition of the grant requirements, but not because this approach would be a practical solution.

Full implementation of the proposed Upper Watershed Stormwater Management Project will further the priorities of the SWRCB ASBS Grant program: to address high threat discharges, provide water quality improvements, protect beneficial uses of the ASBS, and help meet the water quality objectives defined in the COP.

CEQA/ Schedule

The City has conducted a preliminary environmental review of the proposed project, and an initial study checklist with project comments is included as Attachment 4. It is the City's strong believe that a mitigated negative declaration is the appropriate CEQA document for the project. Typical environmental concerns that may cause the City to conduct a full blown environmental Impact Report are not anticipated to affect the City's project, as discussed below.

Often jurisdictions choose to pursue an EIR to address strong opposition to a project by the Public. As discussed at the beginning of this letter, the project was developed though an intensive public process, and the proposed project carries the support of the community to address water quality in the ASBS.

Another typical concern that may trigger an EIR is hydrology and groundwater. The project scope of work includes a geotechnical analysis and pre-infiltration analysis as a first step, which will ensure the project will be designed to avoid adverse impacts to these resources. The project concept was developed in coordination with both state and federal agencies that may have permitting authority over the project, and therefore, it is not anticipated that these same agencies, such as the Coastal Commission and CA Dept of Fish and Game would have objections to the project, if appropriate mitigations are included.

The last CEQA section that can often trigger an EIR or delays in a project is cultural resources. The cultural resources in the area are well documented by the numerous Indian tribes in the region. The City has conducted several other construction projects in the general vicinity of the proposed stormwater project, and has not encountered any issues with cultural resources for those projects. Thus, it is reasonable to assume that cultural resources can be easily avoided by the project.

The proposed project schedule includes 4 months for completion of CEQA documents. There is flexibility in the schedule that allows for an additional year to get final CEQA clearance, which would occur concurrently with project design. Thus, even if CEQA took a few additional months to complete, it would not delay construction of the project.

The next section presents additional details requested by the ASBS Task Force, which supplements the information presented above.

Task Force Questions

The ASBS Task force has questions on several areas of the grant application. These comments are addressed below in the order they were presented in the proposal review details.

The Project Team seems qualified to successfully complete the project; however, there is no coordination or recognition of collaboration with State Parks, or private property owners. The proposed LID/bioswale project abuts State Parks property, and the proposed LID appears to be on private property. The Proposal doesn't describe coordination with the Department of Fish & Game.

This comment is addressed above under project coordination.

The Proposed schedule seems reasonable and within the timeframe for completion, except for CEQA. CEQA for this project is not completed and may delay project implementation if an EIR is required.

A draft initial checklist indicating there are no major environmental obstacles to completing CEQA and getting environmental clearance for the project is included as Attachment 4. Additional discussion is provided above under 'CEQA/Schedule'.

Proposal's SOW shows detail for each task item. The budget did not provide enough information on costs. The SOW and Budget did not seem to match, and it was unclear what would be implemented with the funds.

The Proposed Project Scope of Work was provided as Attachment 3 to the Project Application while the budget was provided in Attachment 4. The Budget was developed using the five cost categories presented in the Proposition 84 ASBS Grant Program Guidelines (April 1, 2008). The Scope of Work was developed using these same cost categories. Each scope of work task is linked directly to a budget line item using the letter code (a-e) from the budget cost categories and an individual number. In this way each scope of work task can be directly linked to a budget line item. Further, Attachment 4 from the grant proposal included six supporting budget tables that provided additional detail for each budget line item, using the same letter/ number code discussed above.

The final budget table in Attachment 4, Table 4c, lists the construction costs, and indicates the general components to be implemented. As discussed under project feasibility, the final components cannot be described and designed until the necessary geotechnical and pre-infiltration analysis have been completed. The City is committed to implementing LID/ BMPS similar to those presented in Attachment 8 of the full grant proposal.

The Proposal does a reasonably good job of providing technical details, and the proposed control measures are appropriate, proven and reliable. However, only a qualitative (rather than quantitative) estimate of the receiving water quality benefits is provided. An awkward aspect of the proposal is that it provides for design of the controls for the lower area, but leaves unanswered the question of whether funding would become available for construction of the lower area controls, or whether the funds spent for design might be wasted. Street-level photos would have been helpful, including photos of the property where the BMP will be located on the vacant parcel, creekside photos, and photos of existing infrastructure and DI, culverts, that this project will replace.

At this point in time, with the completion of the geotechnical analysis and pre-infiltration analysis, the City cannot quantify the receiving water quality benefits of the project. As mentioned by the reviewer, the methods the City proposes are “appropriate, proven and reliable”, and thus will achieve improved water quality in the ASBS. The project benefits can be quantifiably defined during the early stages of design.

As discussed above under Project Phases/ Scope of Work , the Upper Watershed Stormwater Management Project provides stand alone benefits to the ASBS without the implementation of lower watershed improvements. The studies and pre-design effort that are included in the scope of work are necessary to assure that reducing stormwater in the upper watershed areas does not create problems in other areas of the City such as potentially increasing bluff erosion. The City is willing to discuss with the State reducing the amount of design on the lower watershed portion to only that which is absolutely necessary to assure the upper and lower projects will work together in the future. The state provided funds for this project will not be wasted.

The ASBS Task force requests additional photos of the vacant parcel where the BMP is proposed, creekside photos, and photos of existing infrastructure that this project will replace. Attachment 5

shows photos of the vacant parcel where the largest BMP for the upper watershed is proposed. In regards to infrastructure the project will replace, Attachment 6 includes photos of some of the existing drainage inlets (DIs) within the City of Trinidad watershed. The project will not necessarily replace all of these DIs, as most are fully functionally. The project will re-direct the flow from some of the DIs, add new DIs with different Best Management Practices integrated in, and the project will add new stand alone LID/BMPs to reduce the volume of stormwater flow to DIs. It is not clear what the Task Force was looking for in regards to creekside photos, thus there are no attachments for this item.

This Proposal has a good Attachment 7 which includes pre and post-monitoring and quantifying overall watershed goals. Specific indicators have been identified; however, many of these constituents may not be useful. This proposal would be stronger if more focus was put on human bacteria indicators. The applicant may want to consider new monitoring techniques.

The proposed pre and post monitoring is intended to provide a complete picture of Water Quality of the ASBS. Parameters are included to evaluate human bacteria indicators. The City feels the monitoring program submitted benefits both the current stormwater management project and facilitates a better understanding of water quality in the ASBS.

This Proposal will need further development and the applicant will need to provide the following to the Task Force for approval prior to entering into a Grant Agreement: (1) include a phased approach, with Geotechnical analysis as a first step, (2) quantify the benefits to Mill Creek as a result of the project, (3) provide street-level photos of the property where the BMP will be located, (4) ensure efforts are coordinated with DFG, State Parks and private property owners adjacent to the proposed LID/bioswale project, and (5) address whether an EIR is required and can be completed within the timeframe of the grant.

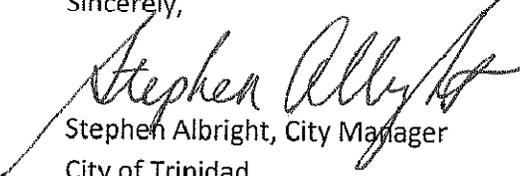
- (1) The project Schedule included in Attachment 5 of the full proposal does include a phase approach with the geotechnical analysis as one of the first steps to be initiated.
- (2) The project is not intended to result in measurable benefits to Mill Creek. The project does propose to infiltrate stormwater into the Mill Creek Watershed .
- (3) These are provided as discussed above.
- (4) The project will continue to be coordinated with local and state agencies as well as private land owners as discussed under Project Coordination.
- (5) An EIR is not required and the appropriate CEQA document a Mitigated Negative Declaration can be completed within the allotted time.

Summary

The City has provided information in this letter, which addresses the comments received from the SWRCB in your August 8, 2010 letter to the City as well as addressing the ASBS Task Force comments on the full application. We believe all comments have been addressed. There are several places the City has indicated we are willing to adjust the project scope to accommodate the needs of the SWRCB/ ASBS Grant Program better. Before implementing any changes to the scope of work or outreach plan, we would like to discuss the project and potential changes with the SWRCB and our City Engineer.

Please contact me at (707) 677-3876 or citymanager@trinidad.ca.gov to discuss next steps in moving the grant agreement forward.

Sincerely,



Stephen Albright, City Manager
City of Trinidad

Attachments: Attachment 1 – ICWMP Stakeholder List
Attachment 2 – Stormwater Action Plan Excerpts
Attachment 3 – Bibliography from “Assessment Model for Sediment Input from Geological Processes on the Nearshore Waters at Trinidad, CA”
Attachment 4 – CEQA Draft Initial Checklist
Attachment 5 – Photos of Proposed Upper Infiltration Area
Attachment 6 – Photos of Existing Drainage Inlets

cc: Rebecca Crow, PE, Winzler & Kelly 633 Third Street, Eureka, CA 95501

Table 7. Trinidad-Westhaven Coastal Watershed Project Participation Structure

Participant Category	Regional Agency	Local Stakeholders	State & Federal Agencies	Project Participants
Participants				
Project Team				
City of Trinidad	•	•		
Redwood Community Action Agency	•	•		
Streamline Planning Consultants	•	•		
Winzler & Kelly Consulting Engineers	•	•		
Critical Coastal Area Pilot Project Advisor				
Stakeholders				
Green Diamond Resource Co.	•	•		
County of Humboldt	•	•		
HSU Marine Biology Lab	•	•		
Center for Integrative Coastal Observation, Research & Education (CICORE)	•	•		
Trinidad Rancheria	•	•		
Tsurai Ancestral Society	•	•		
Westhaven Community Services District	•	•		
Yurok Tribe	•	•		
Humboldt North Coast Land Trust		•		
Trinidad property owners & residents				•
Westhaven property owners & residents				•
Interested Businesses				•
Interested Organizations				•
Other interested parties				•
CCA Pilot Project Advisors				
North Coast Regional Water Quality Control Board			•	
CA Coastal Commission			•	
CA Coastal Conservancy			•	
CDF/CalFire			•	
CA State Parks			•	
CA Department of Fish & Game			•	
CA State Water Resources Control Board			•	
CA Department of Transportation			•	
U. S. Bureau of Land Management			•	
NOAA Fisheries			•	
U.S. Fish and Wildlife Service			•	

13-2 Stakeholder Process

Stakeholder involvement is at the heart of the ICWM Plan development and implementation. The processes of stakeholder collaboration and participation by the general public provide valuable

STORM WATER ACTION PLAN
FOR THE TRINIDAD-WESTHAVEN COASTAL WATERSHED

Prepared by Winzler & Kelly for the City of Trinidad

The Action Plan defines activities needed to achieve the goals of the Watershed Management Plan. These activities may be undertaken voluntarily, and we have identified lead and supporting partners for each task and we look to those entities to act. Some of the recommended actions are already being implemented, while others have yet to be initiated. The City will generally support implementation of this Plan, taking on specific programs and projects that are beyond the mission or capacity of individual organizations/agencies or established partnerships. The City will also continue to provide a forum where programs and projects are discussed and considered. At this time, there is sufficient information to undertake many appropriate management and restoration actions through implementation of the recommendations contained in this Plan. In the future, additional assessment will be useful in guiding us towards more effective and efficient policies and programs; however, due to the complex nature of this natural system, we will continue to depend on the best available information and professional judgment if our efforts to manage human impacts on this system are to be timely.

ACTION PLAN

Action 1.0 Develop a coordinated and comprehensive water quality monitoring plan for Trinidad Bay and tributary streams.

Clean water is essential to aquatic, coastal and marine environments. In the Trinidad Bay watershed, water quality and healthy aquatic habitats are influenced by tidal circulation, by activities that occur nearby on land, and by pollutants delivered via surface run-off and subsurface seepage. A comprehensive long-term monitoring program is needed to document baseline conditions and identify trends for pollutants of concern. Pollutants refers to human created or induced alterations in the physical, biological or chemical character of water thereby producing undesirable environmental results, as well as the standard evaluation of substances affecting human health. Monitoring would provide the information needed to evaluate water quality in the bay and its tributaries, as well as the efficacy of projects to reduce non-point sources of pollution, management practices intended to improve water quality, and educational programs. It is anticipated that considerable energy and capital will be expended to improve water quality and it is essential to have a scientifically valid database to determine action efficiency. In this way, adaptive management and conservation strategies based on the most current and best available monitoring data can be incorporated into future actions in the watershed to improve water quality and watershed health.

The development of a comprehensive water quality monitoring program is only the first step in watershed monitoring for Trinidad Bay. Along with baseline monitoring (to characterize existing conditions) and effectiveness monitoring (to determine the success of existing or newly implemented projects or management practices), bio-indicators should be identified and monitored. In addition, it is necessary to monitor and evaluate land-use practices and other

- community and visitors, including: bed & breakfasts, state and national parks, inns and other commercial establishments including kayaking companies.
- Develop and disseminate an updated bibliography of scientific literature on Trinidad Bay.
 - Prepare an annual newsletter to be sent out to all residents in the watershed, and consider combining with local organizations' newsletters to increase visibility and readership. Post newsletter electronically on website, and if possible on other websites.
 - Develop a list of volunteer opportunities in the watershed- avenues for active engagement. Include this material in our outreach materials and website. Query local groups and agencies on their volunteer needs and programs.

II. Medium and long-term activities to increase public awareness about watershed stewardship:

- Promote education and outreach to encourage water conservation and the importance of installing common household low-water usage appliances (e.g. low flow toilets), and use of appropriate landscaping practices (e.g. planting native, drought tolerant plants).
- Support development and dissemination of watershed-based curricula to local schools. Promote and enhance watershed education efforts at local schools.
- Promote watershed educational outreach opportunities including hikes, tours, seminars, etc. Participate in and support existing efforts. Provide information on on-going volunteer opportunities with partners in the watershed.
- Hold tours of demonstration projects.
- Develop stewardship education packets.

These activities will be successful if they achieve these results. Specific criteria will be developed on a project basis:

1. Creation and dissemination of watershed education materials to communities in Trinidad using different media on a regular basis.
2. Development and maintenance of a website to facilitate education and information sharing about Trinidad Bay and its watershed.
3. Sustained community participating and interest in watershed planning activities.

Action 4.0 Implement Stormwater Projects Within and Outside of the City:

The proposed implementation projects described below were developed based on common stormwater treatment methodologies that target reduction of bacterial contamination. Reduction of impervious surfaces and stormwater retention that encourage sub-surface infiltration are widely accepted approaches for reducing bacterial contamination and loading of pollutants to surface waters. Implementation projects utilizing infiltration treatment methods for bacterial contamination reduction have been conceptually developed for the three project implementation

watersheds. The implementation projects described below are part of the planning objectives and goals set-forth in the ICWMP and meet the Clean Beach Initiative guidelines. Both the ongoing ICWMP planning project and the current proposed implementation projects enjoy support and collaboration with a wide range of local stakeholders and government agencies. There are two project areas for implementation projects proposed for funding by the Clean Beach Initiative program, as described below.

Mill Creek and City of Trinidad Watershed Project Area

The Mill Creek Watershed drains the northern region of the ICWMP planning area in addition to the northern portion of the City of Trinidad. The existing watershed divide is shown on Figure 3. Figure 3 shows an overview of the project area and current drainage patterns based on watershed divisions. Studies to date reveal that stormwater runoff originating in the northern portion of the City of Trinidad is routed through a series of roadside ditches, drain inlets, and culverts which discharge to the Mill Creek drainage. Stormwater originating in the central portion of the City of Trinidad watershed is also routed through a series of roadside ditches, drain inlets, and culverts to a storm drain outfall adjacent to the boat launch on Trinidad Bay Beach. The Humboldt State University (HSU) Telonicher Marin Lab (TML), and the Trinidad Rancheria Parking Facility are also located within the City of Trinidad Watershed. Stormwater from the HSU TML is also routed in a storm drain that parallels the City's system and they discharge at the same location. A photo of both outfalls is shown in a photo on the following page.

The Trinidad Rancheria mainly has limited stormwater runoff from their parking facility near the harbor and Trinidad Head. The Trinidad Kelp Beds Area of Special Biological Significance (ASBS) is located around Trinidad head and adjacent to these outfalls as shown in Figure 2.1. Implementation projects that will reduce bacterial contamination in the waters at Trinidad Beach and Trinidad Bay Beach in addition to minimizing direct stormwater discharge into the ASBS region have been conceptually developed as part of the ongoing integrated watershed planning process. Stormwater treatment techniques utilizing infiltration and bio-retention swales will be incorporated into the implementation project area which has been conceptually identified on Figure 4. The implementation projects will include collecting and re-directing stormwater runoff through a series of bio-retention swales and infiltration galleries.

The proposed re-directed drainage paths will result in manageable runoff volumes suitable for the proposed treatment technologies. As shown on Figure 4, some drainage will be diverted from Trinidad Bay Beach and re-routed to the Mill Creek drainage where it will be treated by similar techniques. The result will be to reduce the volume and loading of pollutants at Trinidad Bay Beach while not increasing the volume or loading to Mill Creek by utilizing retention and infiltration. In addition to reducing bacterial contamination in stormwater runoff, the implementation projects will allow for the City of Trinidad, the HSU TML, and the Trinidad Rancheria to approach a zero direct discharge of stormwater. This implementation project is too conceptual at this point to promise a zero direct discharge, but it appears feasible to design for a 100 year storm event and is the ultimate goal of this project. These implementation projects are discussed in more detail on the following pages.

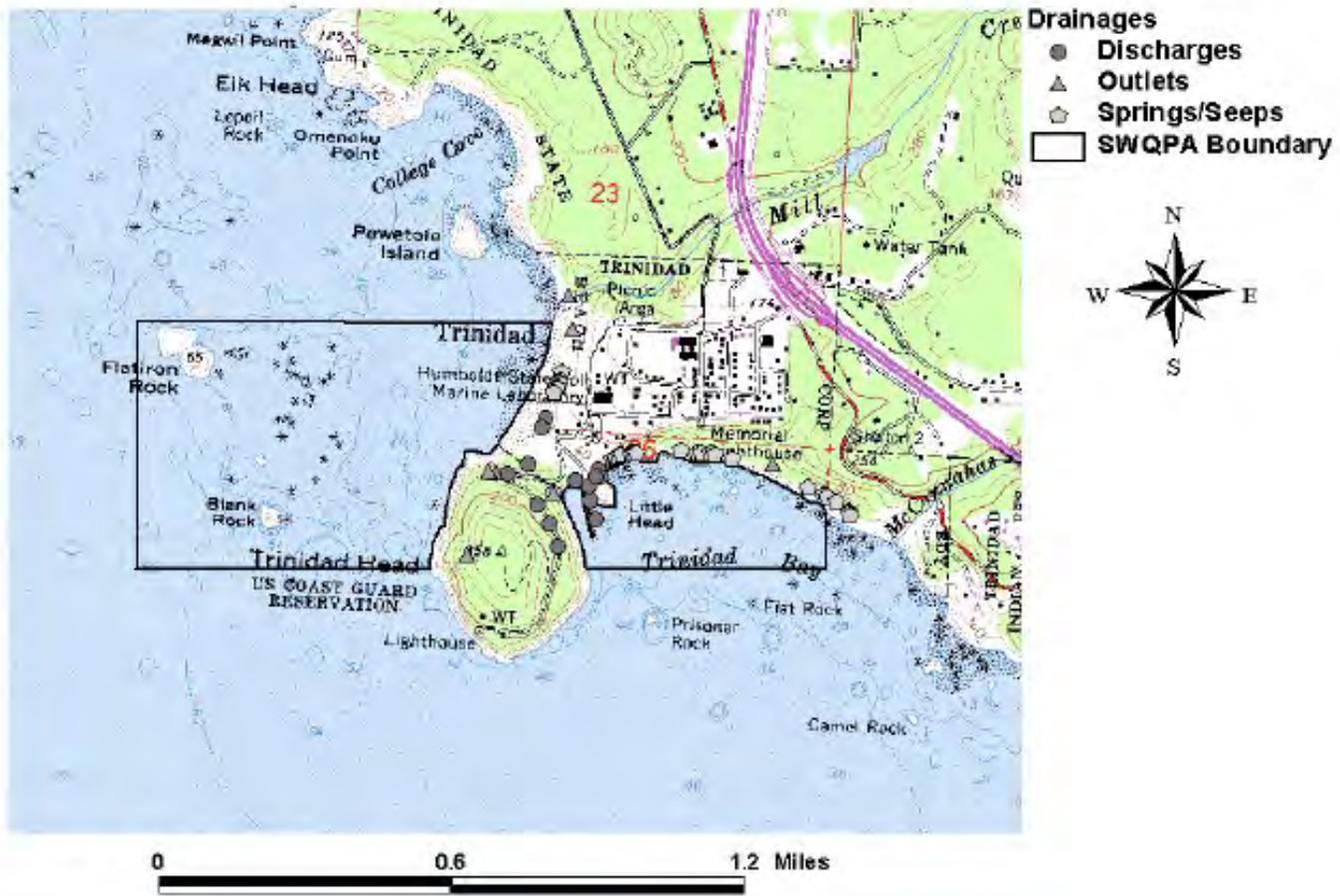
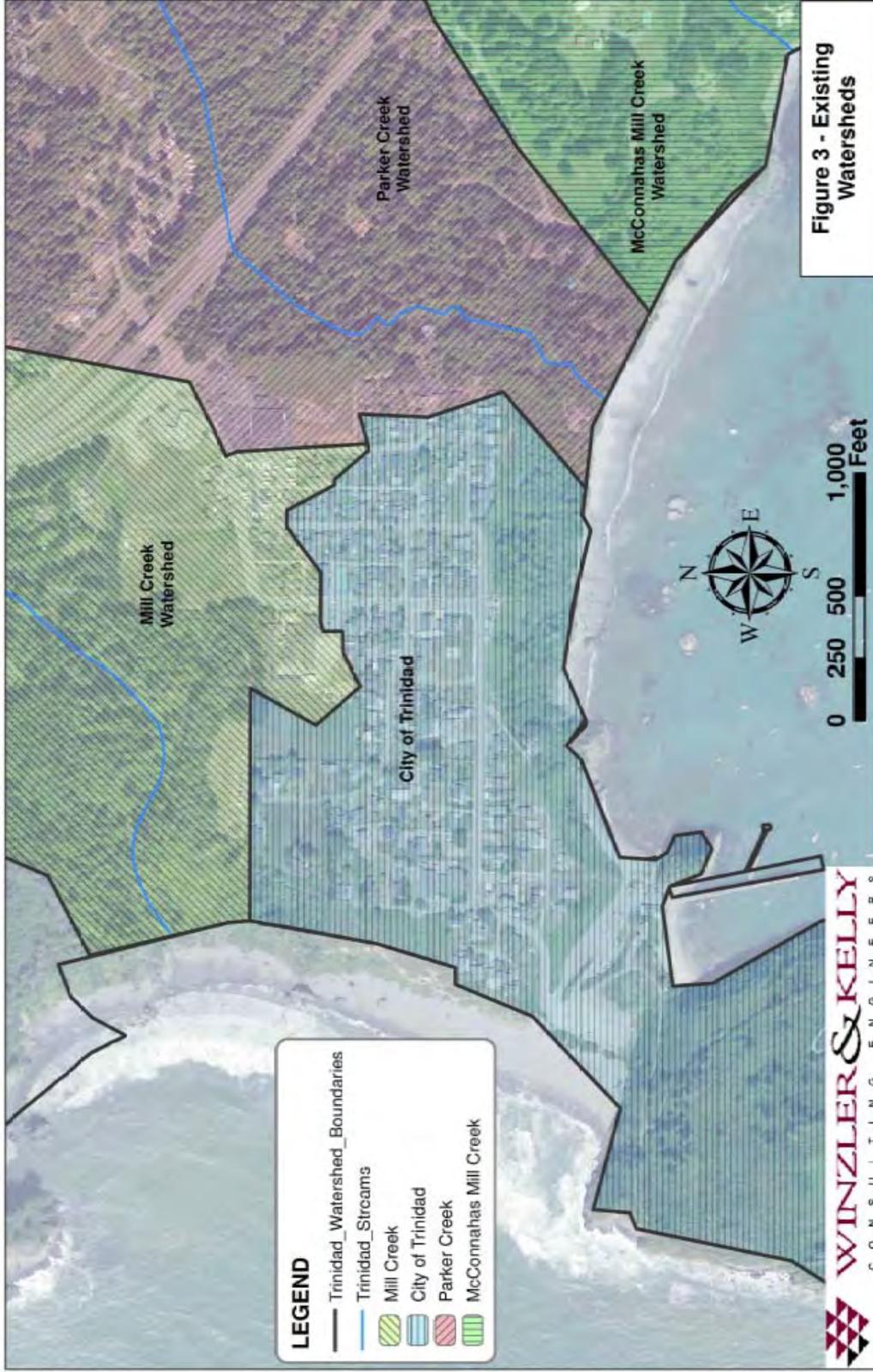
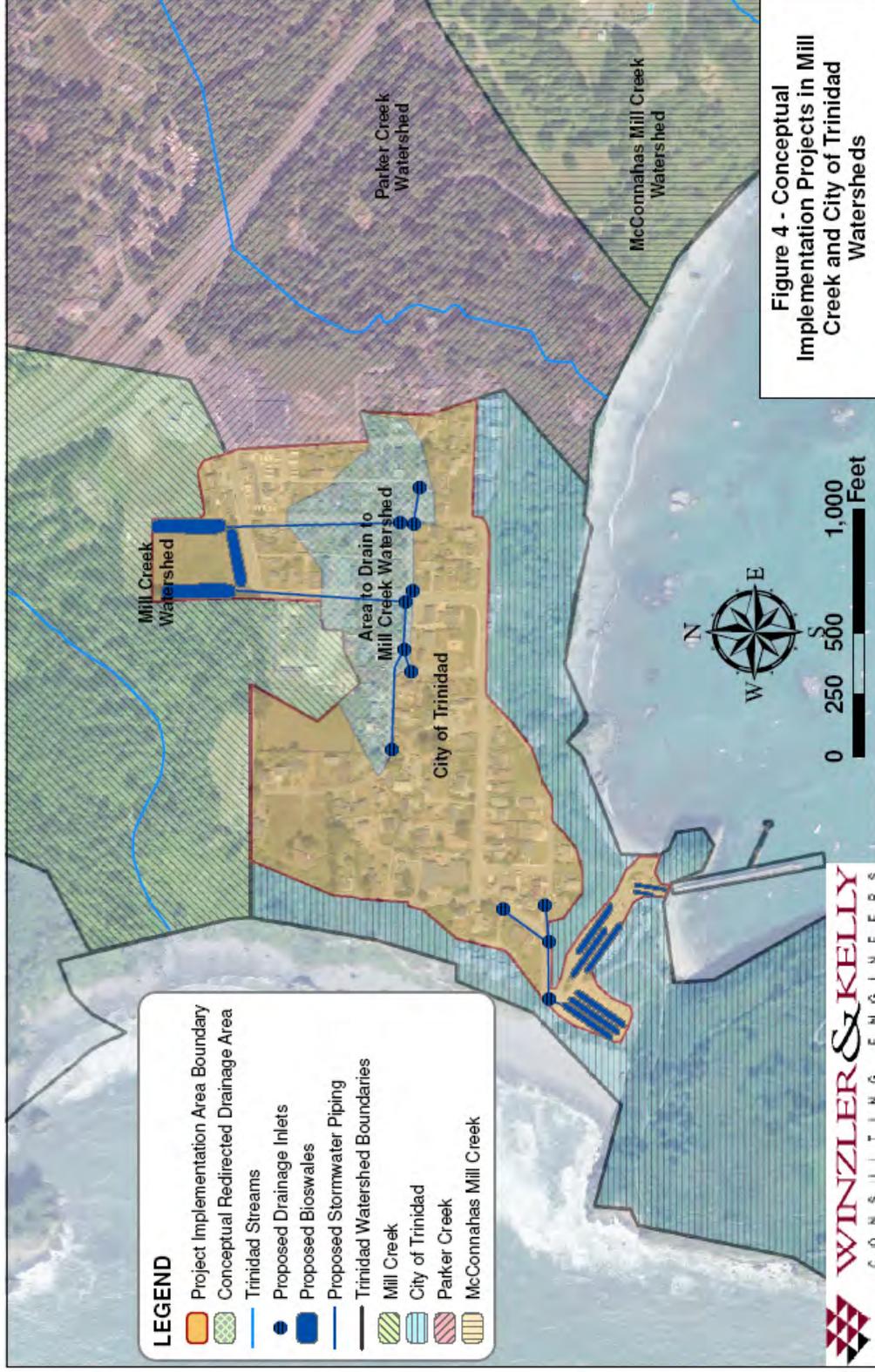


Figure 1 Location of SWQPA at the Trinidad Kelp Beds and Surveyed Discharges



Figure 2 Example of Storm Water Discharge Points at Trinidad Bay Beach. HSU TML Storm Water





Excerpts from

ASSESSMENT MODEL FOR SEDIMENT INPUT FROM GEOLOGICAL PROCESSES ON THE NEAR SHORE WATERS AT TRINIDAD, CALIFORNIA

Winzler & Kelly, March 2008

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CEQA DRAFT Environmental Checklist

PROJECT DESCRIPTION AND BACKGROUND

Project Title:	Trinidad Head ASBS Stormwater Management Improvement Project
Lead agency name and address:	City of Trinidad P.O. Box 390 Trinidad, CA 95570
Contact person and phone number:	Mr. Stephen Albright, City Manager (707) 677-3876
Project Location:	City of Trinidad
Project sponsor's name and address:	City of Trinidad P.O. Box 390 Trinidad, CA 95570
General plan description:	
Zoning:	
Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation.)	Project is to install low impact development best management practices throughout the City of Trinidad to reduce stormwater discharges to the Kelp Beds at Trinidad Head Area of Special Biological Significance
Surrounding land uses and setting; briefly describe the project's surroundings:	Stormwater improvements will be install within or next to developed areas within the city limits of Trinidad.
Other public agencies whose approval is required (e.g. permits, financial approval, or participation agreements):	State Water Resources Control Board, CA Coastal Commission, CA Department of Fish and Game, and Trinidad Rancheria

CEQA Environmental Checklist

This checklist identifies physical, biological, social and economic factors that might be affected by the proposed project. In many cases, background studies performed in connection with the projects indicate no impacts. A NO IMPACT answer in the last column reflects this determination. Where there is a need for clarifying discussion, the discussion is included either following the applicable section of the checklist or is within the body of the environmental document itself. The words "significant" and "significance" used throughout the following checklist are related to CEQA, not NEPA, impacts. The questions in this form are intended to encourage the thoughtful assessment of impacts and do not represent thresholds of significance.

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS: Would the project:				
a) Have a substantial adverse effect on a scenic vista	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project is not anticipated to result in remove of a significant amount of vegetation. There are very few mature trees within the project areas, and these will be avoided where possible. If tree removal is necessary, the project may require tree planting mitigation depending on the species, age, size, or aesthetic nature. Some proposed improvements will include new vegetation as a means to uptake and treat stormwater. A majority of the project will be occurring below the ground surface and will not be visible when the project is complete. No new lighting source or glare would be associated with the proposed project.

II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<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"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<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"/>

The proposed project will not result in impacts to agricultural resources. There are no lands zoned for agricultural use within the project area.

III. AIR QUALITY: Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project is in the North Coast Air Basin and is under the regulatory jurisdiction of the North Coast Unified Air Quality Management District. The air basin is currently in attainment (or is unclassified) of all state and federal ambient air quality standards, with the exception respirable particulate matter [less than ten micrometers in diameter (PM10)], fine particulate matter [less than two-and-half micrometers in diameter (PM2.5)], and Ozone (O3). Industry standard Best Management Practices would need to be utilized to mitigate temporary construction related emissions to a less than significant level. The final project once constructed is complete will not contribute to air emissions impacts.

IV. 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project will result in improved water quality in the Kelp Beds at Trinidad Head Area of Special Biological Significance (ASBS), which will have appositive impact on aquatic species. A preliminary review of listed and proposed endangered and threatened species from the USFWS web-based database Trinidad Quadrangle January 2008 indicates the only species of concern are potential nesting birds.

Most of the species on the list are marine or aquatic species which could not occur on the terrestrial sites within the City where there is no existing permanent water. The only terrestrial species are birds associated with specific habitat types such as old growth forest (marbled murrelet, northern spotted owl), beach/foredune/sandbar (western snowy plover), or black cotton wood/ willow riparian habitat (western wellow-billed cookoo). There were no records of these species in the immediate project vicinity, and there is no known suitable endangered or threatened species habitat on the project site. A follow up biological survey and database review is planned to verify the January 2008 findings.

If any impacts to candidate or listed species, riparian habitat or other sensitive natural community, wetlands, and migratory species are determined may result from the project, industry standard BMPs would be utilized to minimize impacts. BMPS may include pre-construction survey, and limitation on timing of construction.

V. CULTURAL RESOURCES: Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Several cultural surveys and records searches have been conducted for other projects within and near the proposed project. Cultural resources are well documented in the area in part as a result of the extensive work of the Trinidad Rancheria and Tsauri Ancestral Society. An additional cultural resources survey would be required for portions of the project area not previously evaluated within the Area of Potential Effect (APE) for the proposed project. It is anticipated that the project can be designed and constructed to avoid all impacts to cultural resources. A mitigation measure will be added to the project to address potential accidental disturbance of cultural resources.

VI. GEOLOGY AND SOILS: Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation	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:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project is located in a seismically active area. A geotechnical report will be prepared for the proposed project and recommendations will be incorporated in to project plans and specifications, as well as mitigation measures.

VII. GREENHOUSE GAS EMISSIONS: Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

An assessment of the greenhouse gas emissions and climate change will be included in the body of MND. The final project is anticipated to have no net increase in green house gas emissions, and may reduce overall reduction of emissions with implementation of stormwater management technologies which include increased vegetation throughout the City.

VIII. HAZARDS AND HAZARDOUS MATERIALS: Would the project:

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"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<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 result in a safety hazard for people residing or working in the project area?	<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 result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project does not involve the use or storage of any hazardous materials. An EDR search will be conducted to assess the potential of hazardous material sites within the project area. The proposed project would not affect airport land use, impact adopted emergency response plan or emergency evacuation, or expose people or structures to potential impacts from wildfires. During project construction the contractor would need to have an emergency vehicle response plan in place.

IX. HYDROLOGY AND WATER QUALITY: Would the project:

a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project will reduce the quantity and improve the quality of stormwater being discharged from the City of Trinidad into the Kelp Beds at Trinidad Head ASBS. The proposed project includes the permitting, design, and implementation of watershed stormwater management controls including redirecting the watershed flows to retention/infiltration areas and implementation of Low Impact Development (LID) BMPs. The project includes a geotechnical study and pre-design hydrogeologic analysis to determine the amount and location where additional stormwater can be infiltrated without causing adverse impacts to surface or groundwater, and to avoid adverse impacts to the stability of the bluffs surrounding the City. In this way potential impacts to hydrology can be mitigated. The project will have a net benefit to water quality. The Project was developed through the City's Integrated Coastal Watershed Management Plan by a diverse group of stakeholders including all potential permitting agencies. Thus significant investment has already been made by the City to assure the proposed stormwater management project will not have a negative affect on hydrology or water quality.

X. LAND USE AND PLANNING: Would the project:

a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The majority of the project will be constructed within existing City right of way along roadways. For the most part the infrastructure will be located underground and will not be visible. The project will not conflict with any existing land use plans and is consistent with the City's Integrated Coastal Watershed Management Plan.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XI. MINERAL RESOURCES: Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of 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"/> |

The project will not result in the loss of known resource or loss of availability of a resource delineated in an adopted plan.

XII. NOISE: Would the project result in:

- | | | | | |
|---|--------------------------|-------------------------------------|--------------------------|-------------------------------------|
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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 type="checkbox"/> | <input checked="" 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 checked="" type="checkbox"/> | <input 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 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 people residing or working in the project area to excessive noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The project will generate noise from the use of construction equipment during project construction. Potential exposure to ground borne vibration may occur during construction for limited periods of time for installation of major subsurface infrastructure. Noise and vibration impacts would be mitigated by limiting the hours of construction from 7 am to 7 pm each day. There would be no permanent noise impacts once construction is complete. The project is not located within an airport land use plan or in the vicinity of a private airstrip.

XIII. POPULATION AND HOUSING: Would the project:

- | | | | | |
|---|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input 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"/> |

The proposed project addresses existing stormwater discharges in the City of Trinidad. The project will be planned to address existing infrastructure and the capacity will be consistent with the City's general plan. This project is not considered to be growth inducing.

Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	
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XIV. PUBLIC SERVICES:

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project will not affect the provision of public services. The project will improve stormwater management thought out the City.

XV. RECREATION:

a) Would the project 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) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project will not affect recreational resources.

XVI. TRANSPORTATION/TRAFFIC: Would the project:

a) 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 checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) 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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) 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 checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project will have an impact on traffic patterns during construction. During project construction the contractor would need to have an emergency vehicle response plan in place, which will mitigate for potential impacts to emergency access.

XVII. UTILITIES AND SERVICE SYSTEMS: Would the project:

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 effects?	<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 effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 which 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 checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project does not involve changes to the City's solids waste or wastewater systems. Construction related project debris will be sent to an appropriate permitted landfill. The project will result in an improved storm drain system. The result of these improvements will be reduced impact on the environment.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- 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, substantially 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?
- 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)?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Trinidad Head ASBS Stormwater Management Improvement Project

Street level photos of vacant parcel where BMP will be located



Trinidad Head ASBS Stormwater Management Improvement Project- Existing Storm Drainage Photos

