



Reference: 017190

August 28, 2018

Trinidad Civic Club
Memorial Lighthouse Preservation Committee
P.O. Box 295
Trinidad, CA 95570

Subject: Response to California Coastal Commission Review Comments of Coastal Development Permit Application No. 1-18-0630

To the Committee:

This report provides responses to review comments from the California Coastal Commission (CCC) relative to Coastal Development Permit (CDP) Application No. 1-18-0630. This CDP application is for the temporary relocation of the Trinidad Memorial Lighthouse (TML) and Memorial Bell. The CCC review comments were prepared by Ms. Tamara Gedik, a Coastal Program Analyst, and were dated July 25, 2018. This report specifically addresses items 2A, 2C, 2E, and 3 in the CCC review report. Responses to other questions in the CCC request are being provided by the Civic Club, directly to the CCC.

CCC Review Comment 2.A.: This review comment requests additional clarification regarding the demolition work proposed at the former TML site. As described in the project description, the demolition items include two foundation slabs, adjacent sidewalks, the bell foundation, and associated electrical wiring (SHN, 2017). Although it is not our intent to define the means and methods of the crew that will do the demolition, we can discuss the general approach to the demolition, and how the work can be completed without impact to the surrounding site. As discussed in the project description, the work will be completed by Tribal members, under the direct supervision of an SHN inspector and a variety of cultural monitors. The Yurok Tribe has graciously offered to complete the work, and we trust that the Tribal members will work diligently to minimize site impacts in order to protect cultural resources on surrounding lands. We assume the CCC extends the same level of trust to the Tribal members.

The proposed work is relatively simple, and is associated with a low potential for impacts to surrounding ground. The approach to the work has been designed to reduce impacts to the extent possible. All work is to be completed by hand, or with hand equipment (jack hammer, for example) powered by a generator or compressor parked on Edwards Street; no heavy equipment will access the site. The slabs and concrete walkways can be broken up and removed from the site in pieces small enough to be removed by hand. The slab that supported the former lighthouse is 6 inches thick; we expect the adjacent sidewalks to be thinner (and therefore, easier to remove). There is no need to excavate significant amounts of soil around the slabs in order to remove them. Therefore, soil disturbance associated with removal of these items will be strictly limited to the footprint within which the demolition is occurring. At the conclusion of the demolition work, we expect the site to consist of localized areas of bare, disturbed soils surrounded by intact grass-covered ground that will result in a very low potential for erosion and transport of soil or sediment toward adjacent slopes.

Soil disturbance outside the immediate footprint will be associated with removal of the sidewalk along the southern edge of the site, adjacent to the wooden steps that lead to the Axel Lindgren Trail. The sidewalk will be removed by working from the north, such that successive pieces will be broken off and removed,

until the southern edge can be pried up from the north side, leaving the strip of soil adjacent to the stairs intact. In the absence of significant potential for damage to the existing stairs, a contingency plan is unwarranted.

Excavation will be required to demolish the bell foundation. The size of the foundation, or its depth of embedment, is not known. The foundation will be exposed by hand excavation, and removed in pieces. The areal extent of soil disturbance will be strictly monitored and limited to the extent feasible. The bell is in the central part of the site, several feet from the slope break at the southern edge of the subject flat. Work will be completed from the north side of the foundation. Therefore, we do not anticipate that the foundation excavation will encroach toward the surrounding slopes.

The method for replacing soil into excavations at the site is described in the project description that accompanied the CDP application (fifth paragraph on page 4).

The subject work will be strictly limited to the areas where hardscape is to be removed. The work will be closely monitored by an SHN inspector, who will ensure that no unnecessary disturbance occurs. As such, disturbance will be restricted to the flat surface upon which the lighthouse and bell were previously located. There will be no disturbance of surrounding slopes, and spoils will not be sidecast onto the adjacent hillside. The site will be returned to its pre-demolition condition in terms of site drainage and erosion potential. There is a negligible potential that the shallow excavation work associated with the proposed demolition will have any impact on the stability of the site or surrounding slopes.

CCC Review Comment 2.C.: A site plan of the Trinidad Harbor site, where the lighthouse and bell have been relocated, is attached.

CCC Review Comment 2.E.: We expect soil spoils to be generated only during the excavation of the bell foundation. That material will be temporarily stockpiled onsite, prior to its replacement as engineered fill in the excavation from which it was derived. We expect this onsite storage to persist for no more than a day, because once the foundation is removed, it will be backfilled immediately.

Concrete debris associated with the demolition of slabs and other hardscape at the site will be taken offsite to the GRS Construction yard on Boyd Road in Arcata (this site is outside the Coastal Zone). It will be processed with other construction debris at the site.

CCC Review Comment 3: Because we are not defining the means and methods of the work to be completed, we do not know whether a concrete saw will be used at the site or not. The contingencies in the project description were included as a precaution. However, if the contractor chooses to use a concrete saw during the demolition, a saw with a built-in vacuum system to capture wastewater will be required. These vacuum systems essentially eliminate wastewater during use of the saw.

Erosion Control Plan: As described in the project description, soil disturbance will be strictly limited to the areas subject to demolition; no other areas will be disturbed. All disturbed areas will occur on the flat surface of the site; no work is to be completed on sloping ground surrounding the site. We expect that following the demolition work, areas of localized disturbance will be surrounded by intact, grass-covered ground that will significantly reduce erosion potential. Disturbed soils at the site

Trinidad Civic Club

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will be re-vegetated following the completion of operations. If there is a lag in time between the demolition work and the re-vegetation at the site, bare disturbed soils will be covered with straw as short-term erosion mitigation.

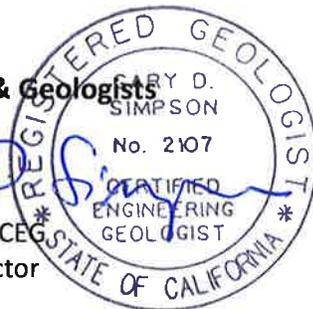
Overall, this project is associated with a negligible potential for erosion that will impact the adjacent bluff or Trinidad Bay. Disturbed areas resulting from the demolition of hardscape on the flat site will be straw-covered then, re-vegetated, to prevent soil movement. A straw wattle will be placed around the perimeter of the site at the slope break as a precaution to prevent offsite migration of soil and to filter runoff.

We trust that the information presented herein provides the necessary responses to advance the permit process. If there are additional concerns, please do not hesitate to call me at 441-8855.

Respectfully,

SHN Engineers & Geologists


Gary D. Simpson, CEG
Geosciences Director

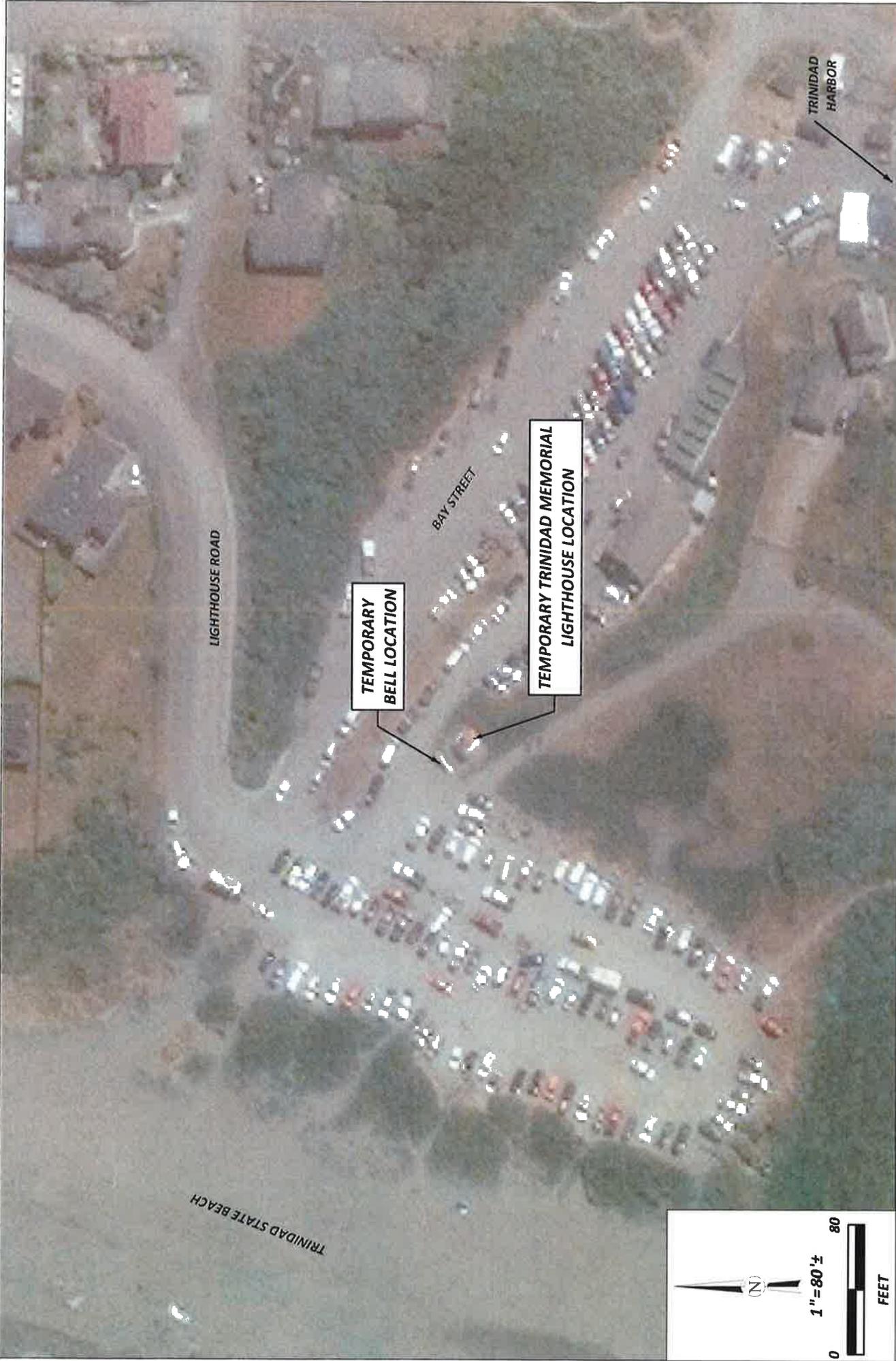


GDS:lms

Attachment: Ste Plan

Reference Cited

SHN Engineers & Geologists. (November 28, 2017). Project Description to Support an Emergency Coastal Development Permit Application for Relocation of the Trinidad Memorial Lighthouse



<p>IMAGE SOURCE: TERRA SERVER, DATED 7/14/2018</p>		<p>Trinidad Civic Club Trinidad Memorial Lighthouse Trinidad, California</p>	<p>Lighthouse & Bell Temporary Location SHN 017190</p>
<p>August 2018</p>		<p>Temporary_TML_Location</p>	
			<p>Figure 1</p>

letter to CCC & City Planners/Re: Cultural Monitor Information

baycity@sonic.net

Sat 8/25/2018 12:33 PM

To: baycity@sonic.net <baycity@sonic.net>; Trever A. Parker <trever@streamlineplanning.net>; Gedik, Tamara@Coastal <Tamara.Gedik@coastal.ca.gov>;

Cc: Gary Simpson <gsimpson@shn-engr.com>; Dana Hope <danahope66@hotmail.com>; Jan West <tcc@trinidadcivicclub.org>;

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August 25, 2018

To: Trever Parker, Streamline Planning, Trinidad Planning Commission, and Tamara Gedik, California Coastal Commission

Re: Response to July 25, 2018 letter from Ms. Tamara Gedik on Coastal Development Permit Application #1-18-0630

Dear Trever and Tamara,

Responding to California Coastal Commission representative Tamara Gedik's letter on July 25, 2018 to Trinidad Civic Club, following her review of the CDP turned in June 25, 2018 asking for "additional information" on Cultural Monitors (2B on page three of letter), here is the TCC's best effort to answer monitoring concerns:

It is Trinidad Civic Club's understanding that The Trinidad Rancheria and the Yurok Tribe have authority to train and certify qualified Cultural Monitors. Both the Trinidad Rancheria and the Yurok Tribe have exercised this authority in training and certifying their own Cultural Monitors and these tribes maintain policies and procedures governing cultural monitoring.

Citing the May 8, 2018 SHN Project Description to Support the Application for a Coastal Development Permit for Relocation of the Trinidad Memorial Lighthouse, please see Page 3 under "Objectives of Proposed Work," which states "Due to the cultural sensitivities at the site, the work will be completed by members of the Yurok Tribe and will be continuously monitored by both the Trinidad Rancheria and Yurok Tribe for the presence of cultural resources." Also on Page 3 under "Work Scope," the SHN narrative reads "All site work will be conducted under the observation of appropriate cultural monitors of the Yurok Tribe and Trinidad Rancheria. No demolition work or soil disturbance is to be completed without both cultural monitors on site." Further, on page 5 under "Cultural Resources, the SHN narrative reads "All site work will be completed under the observation of cultural monitors from the Yurok Tribe and Trinidad Rancheria," and on page 5, note #5 reads "Following Tribal Historic Preservation Officer Policies and Procedures and Guidelines."

Holding such certifying authority, Trinidad Civic Club has been assured that tribal THPO's adhere to the California Native American Heritage Commission's guidelines and to the Tribal Historic Preservation Officer Policies and Procedures and Guidelines concerning certification and protocols for cultural monitor of projects where ground disturbing work is performed. If members of the Trinidad Ancestral Society have been trained and certified as qualified cultural monitors through a certifying authority such as the Yurok Tribe, then the Yurok Tribe's THPO can assign said person(s) to monitor the project, thus selecting both a qualified certified cultural monitor and a member of the TAS. The Trinidad Rancheria has stated that it supports the Yurok Tribe's THPO rights to cultural monitor selection and assignment.

The Trinidad Civic Club has no objection to certified cultural monitors from any interested tribe to be present, voluntarily, during site work at Trinidad Civic Club property on Edwards at Trinity Street.

Best regards,

Trinidad Civic Club

