

ENVIRONMENTAL ASSESSMENT

City of Trinidad ASBS Stormwater Improvement Project – Phase 2

Prepared for:



Committed to the future of rural communities.

United States Department of Agriculture
Rural Development
221 W. 8th Street
Alturas, CA 96101

Prepared by:



City of Trinidad
409 Trinity Street, P.O. Box 390
Trinidad, CA 95570

**USDA Rural Development
NEPA Environmental Assessment**

Table of Contents

1. Introduction 1

 1.1 Project Name: 1

 1.2 Location:..... 1

 1.3 Prior Environmental Review: 1

2. Purpose and Need for Proposal 1

 2.1 Project Purpose 1

 2.2 Need for Project 2

 2.3 USDA Program Objectives 3

3. Alternatives Including the Proposed Action and No Action Alternative: 3

 3.1 Proposed Action:..... 3

 3.1.1 Design Criteria 4

 3.1.2 Land Requirements 5

 3.1.3 Construction Considerations 6

 3.1.4 Sustainability Considerations 7

 3.2 No Action Alternative 7

 3.3 Keep Existing Outfall Alternative 7

 3.3.1 Design Criteria 8

 3.3.2 Land Requirements 8

 3.3.3 Construction Considerations 8

 3.3.4 Sustainability Considerations 8

 3.4 Other Alternatives Considered 9

4. Affected Environment 9

5. Environmental Consequences 10

 5.1 Land Use 10

 5.1.1 General Land Use 10

 5.1.2 Important Farmland 11

 5.1.3 Formally Classified Lands 12

 5.2 Floodplains 13

**USDA Rural Development
NEPA Environmental Assessment**

5.3	Wetlands	14
5.4	Water Resources	14
5.4.1	Drainage	14
5.4.2	Groundwater	14
5.4.3	Water Quality	15
5.5	Coastal Resources	17
5.6	Biological Resources	17
5.6.1	Overview of Fish, Wildlife, and Vegetation	17
5.6.2	Endangered Species Act	19
5.6.3	Migratory Bird Treaty Act	19
5.6.4	Bald and Golden Eagle Protection Act	20
5.6.5	Invasive Species	20
5.7	Cultural Resources and Historic Properties	20
5.8	Aesthetics	23
5.9	Air Quality	24
5.10	Socio-Economic Impact Assessment / Environmental Justice	26
5.11	Miscellaneous Issues	26
5.11.1	Noise	26
5.11.2	Transportation	29
5.11.3	Human Health and Safety	31
5.11.4	Corridor Analysis	32
6.	Cumulative Impact:	32
7.	Summary of Mitigation	33
8.	References	36
9.	List of Preparers	38
10.	List of Figures	38
11.	List of Attachments	38

USDA Rural Development NEPA Environmental Assessment

1. Introduction

This Environmental Assessment is being prepared to comply with the requirements of §1970.8 for federal actions. This document follows the format provided in RD Instruction 1970-C, Exhibit B.

The use of an Environmental Assessment for the proposed project is appropriate as the development activities receiving USDA RD funding:

- 1) Does not categorically excluded per §1970.53 or §1970.54.
- 2) Does not fall within the categories listed in §1970.151(b) automatically requiring an EIR.

1.1 Project Name:

City of Trinidad ASBS Stormwater Improvement Project: Phase 2

1.2 Location:

The project is located within the City limits of the City of Trinidad, on the west side of Highway 101 in Humboldt County, California (Figure 1). The City is located in rural northern California, approximately 25 miles (highway) north of the county seat of Eureka and 295 miles (highway) north of San Francisco. The Trinidad-Westhaven community has a population of approximately 1,200 people, with 365 people living within the City limits (2010 Census).

The project site is located within City of Trinidad rights-of-way and within the Trinidad Harbor parking area. Specifically, the project is located within the eastern portion of Underwood Drive, the western portion of Edwards Street, Ewing Street and HSU Marine Lab (042-041-013), and APNs 042-071-001, -008 and -009 (harbor parking area).

1.3 Prior Environmental Review:

No prior environmental review has occurred for Phase 2 of the ASBS Stormwater Improvement Project. It is anticipated that a CEQA Mitigated Negative Declaration will be completed in the fall of 2018. A Mitigated Negative Declaration for Phase 1 of the project, which included similar improvements in the eastern portion of the City, was adopted on December 18, 2013; the Notice of Determination is included as Attachment 1.

2. Purpose and Need for Proposal

2.1 Project Purpose

The City of Trinidad (City) is undertaking the Trinidad Head Area of Special Biological Significance (ASBS) Stormwater Improvement Project (project) to reduce polluted runoff into the ASBS. The design of the new stormwater system was developed to collect, treat, and infiltrate City stormwater runoff, thus improving stormwater quality that reaches Trinidad Bay. The project will assist the City in meeting the requirements of the California Ocean Plan's prohibition of waste discharge into the Kelp Beds at Trinidad

USDA Rural Development NEPA Environmental Assessment

Head ASBS. The project objectives are in line with the goals of local programs like the Trinidad-Westhaven Coastal Watershed Management Plan, which was initiated to improve local water quality and protect ecosystems including the Trinidad ASBS. The overall goal of this project is to improve water quality through reducing pollutant discharge to the Trinidad ASBS. This section presents the relevant issues that illustrate the need for the proposed project.

2.2 Need for Project

Trinidad Bay is designated by the State as an ASBS and a State Water Quality Protection Area (SWQPA). There are 34 ocean ASBS areas monitored and maintained for water quality by the State Water Resources Control Board (SWRCB). ASBS occur along the entire length of California's coastal waters. They support an unusual variety of aquatic life, and often host unique individual species.

Stormwater discharge from the City that is conveyed to the existing outfall has the potential to impact the sensitive habitat within the ASBS. In 2006, the CA Coastal Commission identified bacteria, nutrients, and sediment pollutants of concern for Trinidad Bay as part of its designation of Critical Coastal Areas (CCC 2006). In addition, Trinidad's Stormwater Management Plan included hydrocarbons as a priority pollutant (Winzler & Kelly 2008).

In 2004, the City received a letter from the State Water Resources Control Board regarding the "Prohibition of Waste Discharge into the kelp beds at Trinidad Head ASBS" (Attachment 2). This led to a series of monitoring and planning activities that culminated in the Trinidad-Westhaven Integrated Coastal Watershed Management Plan (TRWMWG 2008). Through that process, stormwater was identified as a primary constituent of concern, and initial plans for implementing BMPs and infiltrating stormwater were developed (Winzler and Kelly 2008).

The City has requested and received temporary exemption to the prohibition which requires a number of special conditions. Compliance with the substantial conditions of the discharge exception is prohibitively difficult for a City the size of Trinidad with limited staff and budget resources. The ASBS Compliance Plan (Attachment 3) requires structural BMPs in order to meet the Instantaneous Maximum Water Quality Objectives of the CA Ocean Plan and the "Natural Water Quality Guidelines."

In addition to compliance with regulations, water quality impairments from the discharge of polluted runoff has potential to damage the ASBS ecosystem which could impact the City residents, many who rely on tourism and fishing for income which are both recognized beneficial uses of the ASBS. The beaches along the ASBS also provide an area for water contact and non-contact recreation, including aesthetic enjoyment. Unfortunately, poor water quality discharges threaten these beneficial uses and the inhabitants of the ASBS.

The existing stormwater collection infrastructure is aging and approaching the 50-year mark. Based on the age of the system, there are likely infiltration and inflow issues within the system. Some pipes may have been disconnected and it is unknown where some pipes drain to. The portions of Phase 1 of this

USDA Rural Development NEPA Environmental Assessment

project that have been constructed on Ocean and Trinity Avenues are likely in good condition given their recent construction in 2014.

Population growth within the City is not anticipated to alter the stormwater runoff volume, as there is not much available land within the Phase 2 runoff area that could be developed or altered to significantly change the amount of impervious area.

2.3 USDA Program Objectives

USDA Rural Development is a mission area that includes three federal agencies – Rural Business-Cooperative Service, Rural Housing Service, and Rural Utilities Service. The agencies have in excess of 50 programs that provide financial assistance and a variety of technical and educational assistance to eligible rural and tribal populations, eligible communities, individuals, cooperatives, and other entities with a goal of improvement the quality of life, sustainability, infrastructure, economic opportunity, development, and security in rural America. Financial assistance can include direct loans, guaranteed loans, and grant in order to accomplish program objectives.

The funding being requested for this project is through the Rural Utilities Service Water and Environmental Programs (WEP). WEP provides loans, grants and loan guarantees for drinking water, sanitary sewer, solid waste and storm drainage facilities in rural areas and cities and towns of 10,000 or less. Through Rural Utilities Service WEP, rural communities obtain the technical assistance and financing necessary to develop drinking water and waste disposal systems. Safe drinking water and sanitary waste disposal systems are vital not only to public health, but also to the economic vitality of rural America. Rural Development is a leader in helping rural America improve the quality of life and increase the economic opportunities for rural people.

3. Alternatives Including the Proposed Action and No Action Alternative:

3.1 Proposed Action:

The proposed project is to decommission the existing stormwater outfall and replace it with a system of localized stormwater treatment chambers and infiltration basins. The intent of the design is to treat and dispose of stormwater closer to the areas of stormwater generation, which allows for a more distributed network of stormwater infrastructure that can be tailored to the anticipated runoff volumes generated in the contributing sub-watersheds. In addition, this design would incorporate green infrastructure to provide pollutant removal and capture stormwater runoff.

The base design of each stormwater treatment and infiltration system includes a local network of stormdrain inlets, conveyance pipes, stormwater treatment chambers, and infiltration pipes, in addition to some minor improvements including valley gutters, curbs, and stormdrain manholes. Drainage inlets capture the runoff from the existing curb, gutter and roadway network, which act as the initial receiving body of stormwater generated in the City.

USDA Rural Development NEPA Environmental Assessment

From the inlets, stormwater is conveyed through traditional high-density polyethylene (HDPE) stormwater pipes, which lead into stormwater treatment units. The treatment units are designed to remove oil, dirt, and trash from the stormwater, and are sized to allow the flow from the 50-year, 24-hour storm event through the unit. After leaving the treatment units, stormwater enters the infiltration pipes, which are large perforated HDPE pipes surrounded by drain rock, allowing the accumulated stormwater to slowly infiltrate into the subsurface soil. Further pollutant removal would occur in the natural treatment system provided by the underlying soil. In this design the stormwater infiltration pipes are sized to accommodate the 50-year, 24-hour storm event. Each treatment unit will have a manhole access cover for maintenance.

In total there are four primary stormwater systems that compose the proposed project, each of which is a combination of the improvements noted above. The systems are located along or near Ewing Street, Underwood Drive, Edwards Street, and the Trinidad Harbor parking area (Attachment 4), and are presented in further detail below. Note that the descriptions below are a preliminary estimate, and the exact materials, dimensions and locations may change in the final design. For example, through consultation and development of the cultural report for this project (see Section 5.7), concerns were raised that there is a high potential to disturb cultural resources, including burials in this location. So options for a series of smaller treatment chambers lower down is being explored. However, the entire potential construction area (Area of Potential Effect) is covered in Figures 2 and 3. Pipe installation may occur through trenching or horizontal drilling, and the maximum depth of excavation would be 8 to 12 feet.

Ewing Street: The improvements here include approximately 90 feet of 72-inch diameter stormwater infiltration pipe and stormwater treatment chamber, five new drainage inlets, and approximately 135 feet of new curb and 330 feet of new 12-inch diameter HDPE stormdrain pipe.

Underwood Drive: The improvements here include two new drainage inlets, two 72-inch diameter infiltration pipes (totaling 70 feet) with one treatment chamber, and approximately 150 feet of 12- inch HDPE stormwater pipe and 350 feet of concrete curb and valley gutters.

Edwards / Lower Van Wycke Street: The improvements here include three stormwater treatment chambers, four 36- inch diameter infiltration pipes (totaling 125 feet), 16 drainage inlets, and approximately 1,100 feet of 8-inch diameter HDPE stormdrain pipe.

Harbor Parking Area: The improvements here include one treatment unit, 1,500 feet of 54-inch diameter infiltration pipe, two drainage inlets, and approximately 100 feet of 24-inch diameter HDPE stormdrain pipe.

3.1.1 Design Criteria

Design criteria for constructing an LID system and decommissioning the existing outfall are:

- Ability to treat, store, or infiltrate stormwater;
- Fit within the existing City right of way;

USDA Rural Development NEPA Environmental Assessment

- Ability to upgrade stormwater treatment efficiencies;
- Minimize reduction of city parking; and
- Minimize operation and maintenance requirements.

Infiltration chambers were sized using an infiltration basin model developed using a numeric model to simulate inflow, storage, and infiltration over a 24-hour storm event. The model uses runoff data generated by the hydrologic (HEC-HMS) model to calculate the anticipated quantity of water collected by the new storm drain system which would flow to each infiltration basin. The Green-Ampt equation was used to determine the rate of infiltration based on hydraulic head and advancement of the saturated soil front at each time step. Soil permeability and depth to bedrock were based on values determined during previous geotechnical investigations. The model uses mass balance calculations to determine the volume of stormwater stored in each chamber, which reached maximum values as the hydrographs peaked. The calculated storage volumes were input into an online infiltration basin sizing calculator, which would output the required infiltration basin area, which was then input back into the basin sizing to generate a new required storage volume value. Sizing of the infiltration basins was iteratively optimized in this manner to balance available infiltration area with storage volume. This analysis was performed for storm sizes ranging up to the 50-year – 24-hour storm events. Infiltration basin model and sizing results are included in Attachment 5.

Collection system piping was sized using the Environmental Protection Agency’s (EPA) Stormwater Management Model (SWMM). Smooth walled high-density polyethylene (HDPE) pipe has been selected for the piping system.

The MODFLOW-SURFACT groundwater model was used to simulate stormwater infiltration below ground at the proposed underground infiltration basin locations to verify that the area could accommodate increased infiltration without detrimental impacts to streams, septic systems and bluff stability. Groundwater model outputs were reviewed by GHD and by registered engineering geologists at Crawford & Associates, Inc. and HydroGeoLogic, Inc. to verify that the locations and quantities of stormwater infiltration will not impact the performance of septic systems, compromise bluff stability, or cause significant changes to flows in nearby streams. Technical memorandums from both Crawford & Associates, Inc. and HydroGeoLogic, Inc. describing their findings are included in Attachment 6 and Attachment 7, respectively.

3.1.2 Land Requirements

The construction of this alternative would not require land acquisition or new access agreements. The majority of proposed project components fit within the existing City right of way. Collaboration with Trinidad Rancheria would be required for the portion of the project that would be located in the lower Harbor parking lot area, which is already in progress.

Locations for the proposed improvements were strategically selected based on the existing topography, available open spaces within the City ROW, and distance from coastal bluffs to avoid potential detrimental impacts to bluff stability. The proposed stormwater system would allow stormwater to be

USDA Rural Development NEPA Environmental Assessment

infiltrated at various locations dispersed throughout the City. In the event that a large storm event overloaded the system, excess runoff would flow to the Pacific Ocean via direct overland flow or through Mill Creek and Parker Creeks on the outskirts of Trinidad, as would currently occur with the existing stormwater system or naturally occur if the area were undeveloped.

3.1.3 Construction Considerations

Anticipated construction includes mobilization/demobilization, potholing, temporary construction sign, temporary traffic control, construction staking, erosion and sediment control, excavation, pipe and treatment chamber placement, connection to the existing storm drain system, and decommissioning of the existing stormwater outfall. These improvements are fairly routine construction activities and are not expected to incur any major construction problems. Access to all sites is well established. Problems relating to subsurface rock or high groundwater table are not anticipated based on the geologic investigations that have been completed.

Access to and from the project site would be primarily from Highway 101 via Main Street and Trinity Street. The project improvements would be primarily within existing road ROW and, as such, would not require the development of new access routes. The storage of construction materials and vehicle staging would be managed entirely within existing developed areas and/or other suitable public areas within the project area. As required to construct the project, temporary staging areas may also be established within other public and/or private properties on or near the improvement areas, but would not be established within or adjacent to any sensitive species or habitat. The staging area for this project has not yet been determined, but is likely to be located in the Trinidad Harbor parking area. This parcel has been used as a staging area for other construction projects in the past.

Project construction is anticipated to start in the spring/summer of 2019 and expected to be completed in five to six months (June 1 to October 31 is the target). It is not anticipated that construction would occur for more than six weeks in any one location. All construction will occur either beneath city streets or along the sides of city streets, within the public right-of-way or on City-owned property; the improvements within the Harbor parking area are located on property owned by the City and the Cher-Ae Heights Indian Community of the Trinidad Rancheria (Trinidad Rancheria).

Traffic control will be a major component of this project, as City streets are reduced to one lane of travel or temporarily closed during construction. The majority of the construction work will include pavement sawcutting, trenching, excavation and backfill to install storm drain improvements including storm drains, pipes, infiltration basins, drainage swales, rain gardens and permeable paved areas. Typical earth moving and compaction equipment would be the majority of equipment used, including bulldozers, excavators, backhoes, and rollers. Other equipment and vehicles used would include dump trucks, concrete trucks, paving equipment, portable generator sets, and various power and hand-tools.

Construction activities would be conducted in compliance with applicable state and local requirements and in a manner that minimizes disturbance to adjacent properties and disruption to traffic.

Construction would generally occur between the hours of 7:00 AM and 5:00 PM, Monday through

USDA Rural Development NEPA Environmental Assessment

Friday. No construction would occur on weekends, except with permission from the City as needed to keep the project on schedule. It is anticipated that between eight and 10 construction workers (includes two flaggers) will be present on the project site at any given time. The number of motor vehicles is anticipated to be up to 10. The project would also require the delivery of equipment, workers, and materials via Main Street from Highway 101.

3.1.4 Sustainability Considerations

Alternative 2 incorporates green infrastructure that helps mimic natural hydrologic conditions. This alternative includes LID design components that captures, filters, and infiltrates stormwater runoff. It is gravity based system, so does not require operation. Maintenance includes normal, annual maintenance of street gutters and drain inlets. The proposed infiltration chambers will need to be inspected twice per year. Maintenance includes using a vacuum trailer to removed the accumulated trash, sediment and debris as needed (no more than biannually).

3.2 No Action Alternative

Under the No Action Alternative, no improvements to the existing stormwater infrastructure would occur. Pollutants will continue to be discharged to the Trinidad Head ASBS via the stormwater outfall in violation of the California Ocean Plan.

The No Action Alternative is not feasible, because the City of Trinidad is required to comply with the California Ocean Plan standards that prohibit waste discharges into an ASBS. The City's stormwater outfall has been identified as a high priority, high threat discharge. Analysis of the Trinidad Head ASBS water quality monitoring results indicates there were exceedances for some constituents based on the preliminary natural water quality guidelines (City of Trinidad 2016). Through its MS4/NPDES permit, the City is required to implement structural controls to meet Ocean Plan standards and Special Conditions for discharge into ASBS. The City's ASBS Compliance Plan (Attachment 3) identifies the goal of eliminating the outfall discharge through the use of LID BMPs.

If the City does not comply, the City could be cited and fined for violations of the Ocean Plan and the MS4/NPDES permit (NPDES General Permit No. S000004, Order No. 2013-0001-DWQ – Attachment C). The City was recently granted an extension of the time limit for complying with the Special Conditions due to funding limitations (Attachment 8). The City has shown progress in meeting the requirements by completing or obtaining funding to complete Phase 1 of the Trinidad ASBS Stormwater Project, and by securing partial funding from the SWRCB to complete Phase 2 and by applying for funding through USDA to secure the needed non-state match.

3.3 Keep Existing Outfall Alternative

Under this alternative, the City would continue to discharge to the existing outfall, but install a treatment system at a centralized location prior to discharge at the outfall to meet regulatory requirements (Attachment 9, Figure 3 of Appendix A). To remove the priority pollutants, a two stage filtration system would be implemented, each stage targeting certain pollutants. The initial stage would be a sorptive filtration system, such as the aequip® system from StormwaterRx, which targets the

USDA Rural Development NEPA Environmental Assessment

removal of trash, oils, suspended sediment, nutrients, and some organic hydrocarbons. The second stage would be a targeted stormwater polishing system, such as the purus® system from StormwaterRx, which would target bacteria removal, and additionally further remove organic hydrocarbons.

The system would be connected to the existing main stormwater pipe leading to the outfall at Trinidad Bay, downstream of the final drainage inlet that contributes to the outfall discharge. The sorptive filter(s) would operate as a gravity system, and could be installed either above ground or below ground in traffic rated vaults. The polishing filter(s) would need to be installed above ground and be connected to an electrical power source in order to operate. The polishing filters could likely operate on gravity flow into the unit if the first-stage filters were installed above ground, otherwise, additional pumps and minor storage tanks may be necessary. After exiting the polishing filter(s), treated stormwater would then return into the existing stormwater pipe leading towards the outfall. Under Alternative 1, an NPDES permit and ASBS Compliance Plan would be an ongoing requirement.

3.3.1 Design Criteria

Design criteria for continuing to stormwater discharge to the existing outfall includes:

- Discharge occurs only during wet weather;
- Centralized stormwater treatment system;
- Maintain existing stormwater infrastructure, including repairs as needed;
- Minimize land acquisition (to accommodate new treatment system); and
- Provide water quality treatment for the 2-year, 24-hour storm event.

3.3.2 Land Requirements

The potential area for the treatment system (Attachment 9, Figure 3 of Appendix A) could require land or right-of-way acquisition (APN 042-081-035) from a private owner (Figure 4). It is possible that the system would take only a portion of the property and partial land or right-of-way acquisition could be pursued. The outcome of securing the necessary land requirements is not currently known and may make this alternative infeasible. Further, this is an area where cultural resources have been encountered during past soil disturbance and is therefore considered a highly sensitive area.

3.3.3 Construction Considerations

The construction activities that would be required for this alternative are minimal. Anticipated construction includes mobilization/demobilization, cultural monitoring, potholing, temporary construction sign, temporary traffic control, construction staking, erosion and sediment control, excavation, and treatment vault installation. Problems relating to subsurface rock or high groundwater table are not anticipated.

3.3.4 Sustainability Considerations

This alternative incorporates maintenance simplicity by centralizing the treatment units to a single location. However, the simplicity provided by the single treatment location would likely be outweighed by the operation, maintenance, and demanding monitoring plan that would be required to comply with

USDA Rural Development NEPA Environmental Assessment

the CA Ocean Plan and the City's MS3/NPDES permits. In particular, the extensive monitoring that would be required is a major hurdle. Without eliminating the discharge outfall, the annual monitoring costs are estimated to be \$56,000, and the permitting another \$14,000 per year (Attachment 9, Table 4). That is a significant expense for the City as small as Trinidad, and equates to more than 10% of the City's annual general fund budget of approximately \$650,000 per year; it is not considered sustainable.

3.4 Other Alternatives Considered

Other alternatives were considered and were mainly variations of the two general alternative categories presented in this report. Variations were considered were infeasible due to either technical or cultural constraints. These alternatives included an expanded LID system that incorporated more infiltrators in more locations. Construction of infiltrators in other areas of the City were shown by the groundwater model to increase the potential for bluff erosion, interaction with existing leach fields, or impact to groundwater elevation, and were therefore deemed technically infeasible. More information on the feasibility of alternatives can be found in Attachment 9.

4. Affected Environment

The project is located within the City limits of the City of Trinidad, in Humboldt County, California (Figure 1). The City is located in rural northern California, approximately 25 miles (highway) north of the county seat of Eureka and 295 miles (highway) north of San Francisco. The Westhaven-Moonstone community has a population of 1,205 people (2010 Census), and 367 people live within the City limits (2010 Census).

The City of Trinidad is a small community located on a coastal terrace above the Pacific Ocean. The project occurs almost entirely within City rights-of-way. However, many of the improvements will also be located on or near the edges of coastal bluffs and adjacent to residential development. In addition, some private lands in the Harbor Area / Trinidad State Beach parking lot will be utilized for a portion of the improvements. Land uses surrounding the project boundaries are mostly residential with some adjacent open space and coastal bluffs on the southern or western, downhill side. The Ewing Street portion of the project is also located adjacent to the Humboldt State University Marine Lab and a Trinidad State Park trailhead.

A vicinity map for the City of Trinidad is presented in Figure 2, which includes the location of the Trinidad City Limits, the Trinidad Head ASBS boundary, the stormwater outfall, and topographic data. The entire project encompasses two areas of the City, defined as the upper area (Phase 1) and the lower area (Phase 2) as shown in Attachment 9 (Figure 1 of Appendix A). Components of Phase 1 have either been constructed or are under construction. The proposed project area presented herein includes the Phase 2 area.

Trinidad Bay lies to the south of the project. Trinidad Bay is part of the Trinidad Head Area of Special Biological Significance (ASBS), which is a designated State Water Quality Protection Area (SWQPA). In addition, it has been designated as a Critical Coastal Area by the Coastal Commission. And the City has been designated by BLM as a Gateway to the California Coastal National Monument. There are 34 ocean

USDA Rural Development NEPA Environmental Assessment

ASBS areas monitored and maintained for water quality by the State Water Resources Control Board (SWRCB). ASBS cover much of the length of California's coastal waters. They support an unusual variety of aquatic life, and often host unique individual species.

The 'Trinidad Head' ASBS runs approximately two miles (in total length) near Trinidad Bay in the City of Trinidad as shown in Figure 2. Rural and urban watersheds discharge to this ASBS. Trinidad Bay has seasonal marina facilities (i.e., a mooring field, vessel haulout/launch facilities, and pier facilities), and Humboldt State University Marine Lab is located within the City limits. The ASBS is bordered by an emergent coastline of hard rock which becomes visible as the sandstone and mudstone are worn away by wind and waves (SWRCB 2018).

Much of the urban area overlies a fairly uniform sand aquifer, above a low permeability Franciscan melange (bedrock). The coastal bluffs adjacent to the project area are subject to instability. The bluffs were also the location of a Yurok Village called Tsurai. While the village site itself is located well away (southeast) of the project area, much of Trinidad holds cultural significance to the Yurok People, and therefore the potential for cultural resources within and adjacent to the project area.

This project area encompasses the City of Trinidad watershed, which in turn encompasses most of the City, the surrounding coastal bluffs, and Trinidad Head. The stormwater system collects much of the stormwater that accumulates within Trinidad and discharges it directly to the ASBS through discharge TRI032 (Figure 2). Approximately 80% of the City's stormwater currently drains to this outfall.

The City of Trinidad is one of California's smallest incorporated cities, with a population of 367 at the time of the 2010 Census. Trinidad is primarily a residential community, which minimal infrastructure and services. It is also a destination community due to its harbor, coastal access and recreational opportunities. Visitors come to Trinidad to enjoy the beaches, shop, and hike on the many nearby trail systems.

5. Environmental Consequences

5.1 Land Use

5.1.1 General Land Use

As described above and shown in Figure 3, the project is primarily located within existing, developed, City of Trinidad rights-of-way, including Underwood Drive, Edwards Street, Ewing Street, Van Wycke Street and Lighthouse Drive. Public rights-of-way do not have zoning or land use designations associated with them. Some of the improvements on Ewing Street may be located on property owned by Humboldt State University (Marine Lab, APN: 042-041-013). This project has been designed to accommodate the stormwater discharge from the Marine Lab, and they will be a partner with the City on this project (Attachment 10). Note that the Area of Potential Effect (APE) was drawn oversized and based on an aerial photo (Figure 3). So although the APE indicated in Figure 4 includes a portion of APN:

USDA Rural Development NEPA Environmental Assessment

042-021-001, which is owned by the CA Dept. of Parks and Recreation, no construction is proposed on that parcel.

The project also includes portions of the Harbor Area parking lot (APNs 042-071-001, -008 and -009) and Bay Street (abandoned by the City). Parcels -001 and -008 are owned by the Trinidad Rancheria (in fee, not Tribal Trust), and -009 is owned by the City. Parcels -001 and -009 are zoned Open Space (OS) in the City's Zoning Ordinance, and -008 is zoned Commercial (C). Because Trinidad is so small, the zoning designations are the same as the General Plan designations. A provisional landowner agreement between the City and the Trinidad Rancheria is included as Attachment 11; a more permanent agreement is currently being negotiated.

Most of the area surrounding the project is zoned for and developed with single-family residences. There is OS and Public & Religious zoning adjacent to the improvements proposed on Ewing Street (Figure 4); State Park property is located to the north and west, and the HSU Marine Lab is located to the east. The gravel parking lot in the harbor area is used to access Trinidad State Beach, Trinidad Head, harbor facilities and other coastal access and trails.

The entire project area is within the Coastal Zone of California. The City has a Local Coastal Program, which consists of the General Plan, Zoning, Grading, Building, and Subdivision Ordinance, that has been certified by the California Coastal Commission (CCC). The easternmost harbor parcel (042-071-008) is in an Area of Deferred Certification (ADC). This is an area in which the CCC has not certified the City's land use ordinances, and therefore retains jurisdiction over issuance of Coastal Development Permits (CDPs). The remainder of the project is within the City's CDP jurisdiction, but within the area that is appealable to the CCC. The project will require issuance of a CDP and a Grading Permit by the City.

The proposed project will not conflict with any land use designations or existing land uses. The project is consistent with, and identified in both the Trinidad-Westhaven Integrated Coastal Watershed Management Plan and the City's ASBS Compliance Plan. Once the project is completed, the only above-ground improvements include curbs and drain inlets. Construction will take place over five to six months, and will disturb an area less than three acres. There will be temporary construction impacts such as noise and traffic, which are discussed in sections 5.11.1 and 5.11.2 respectively.

5.1.2 Important Farmland

There are no lands in Trinidad that are zoned or designated for agricultural or forestry use (Figure 4). Nor are there any parcels that are utilized for agricultural purposes except for a small horse pasture and a community garden. This project will not impact either of those parcels. Coastal Act policies are very protective of agricultural land, and Trinidad's land use regulations have been certified by the Coastal Commission as part of the City's Local Coastal Program.

There are no privately owned parcels greater than eight acres in size in the City, and soils are generally very sandy and not conducive to large-scale agriculture. Most of the large parcels in town are located on steep slopes and / or in environmentally sensitive habitat areas, which limit the types of uses that could

USDA Rural Development NEPA Environmental Assessment

be appropriate. In addition, the proximity to the coast results in strong prevailing winds and salt air. The project sites are generally within public rights-of-way, and the surrounding areas are primarily zoned Urban Residential on the inland side with Open Space and Special Environment on the seaward side. The Farmland Mapping and Monitoring Program has not mapped Humboldt County. There are no parcels in the project area under Williamson Act contract.

According to the NRCS Web Soil Survey (Attachment 12), there is one mapping unit (146) that qualifies as prime farmland if irrigated. However, within this mapping unit, the project is going to take place within developed rights-of-way, which are mostly paved. In addition, the project is located within an urbanized area within City limits. The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a nonagricultural use; therefore, no impact would occur.

There is a substantial amount of commercial and non-commercial forest land, including land designated as Timberland Production Zone (TPZ), in upland areas east of Trinidad, outside City limits.

5.1.3 Formally Classified Lands

“Formally classified lands” are those that have been accorded special protection through formal legislative designations and are administered by federal, state, or local agencies, tribes, or private parties. Examples include, but are not limited to, national parks and monuments, national historic landmarks, national wildlife refuges, wilderness areas, State parks, and Bureau of Land Management-administered lands.

Within the City of Trinidad, there is land owned by the California Department of Parks and Recreation that is part of Trinidad State Beach (Attachment 13). The southernmost Trinidad State Beach parcel (042-021-001, Figure 4) is located to the north and west of a portion of the Ewing Street right-of-way and within the mapped APE. However, no improvements will occur on that property. Adjacent to that is the HSU Marine Lab (042-041-013, Figure 4). Some of the improvements may be located on the Marine Lab property. This area is already developed as a paved roadway/ parking area. In addition, City stormwater infrastructure already exists in this location. The project improvements will be located underground, and so will not have long-term impacts.

The southern parcel of Trinidad Head (Attachment 13) is owned by BLM and was recently added to the California Coastal National Monument. A square at the top of Trinidad Head is owned by the U.S. Coast Guard and contains a communication tower and a NOAA weather station. These parcels are outside of and higher in elevation than the project APE and will not be impacted.

As described in Section 5.1.1 above, the lowest and largest infiltration facility will be located partially on land owned in fee title by the Trinidad Rancheria. They have been a partner with the City on this project; a preliminary landowner agreement is included as Attachment 11. Also as described above in Section 5.1.1, this part of the project area is within an ADC, and therefore under CCC CDP jurisdiction; a CDP from the Coastal Commission will be required for this portion of the project. However, because the improvements are located underground, there will be no long-term impacts. There will be temporary

USDA Rural Development NEPA Environmental Assessment

impacts related to noise and traffic. These impacts are addressed below in sections 5.11.1 and 5.11.2 respectively.

Finally, Trinidad Bay is designated by the SWQCB as an ASBS and SWQPA (Figure 2). It is also designated by the CCC as a Critical Coastal Area (CCA). The purpose of the project is to eliminate the existing, direct stormwater discharge into Trinidad Bay, which will contribute to the protection and improvement of water quality in this important resource area.

5.2 Floodplains

According to the FIRM panel 06023C0495G (effective 6/21/2017), the project area is not located within an identified flood hazard area (Attachment 14). Therefore, the proposed project will not be located within a floodplain. The reason the non-coastal areas of Trinidad are mapped as Zone D (undetermined), is because the City did not participate in the original FEMA mapping of Humboldt County. That is because the topographical location on a marine terrace, steep slopes, sandy soils and lack of water bodies preclude the possibility of flooding in most of the City, including the project area.

A portion of the project area is located adjacent to a VE Zone, also known as a coastal high hazard area. These are areas subject to high velocity water including waves; they are defined by the 1% annual chance (base) flood limits (also known as the 100-year flood) and wave effects 3 feet or greater. The hazard zone is mapped with base flood elevations (BFEs) that reflect the combined influence of stillwater flood elevations, primary frontal dunes, and wave effects 3 feet or greater (FEMA, 2005).

The City has analyzed groundwater levels and considered sea level rise as part of the design considerations for this project. The parking lot in the Harbor Area where the improvements are proposed is located at an elevation of 28.15 feet above MSL. The depth to groundwater was measured in a monitoring well in this location between November and May. The highest recorded groundwater level was 13.15 feet above MSL, leaving 15 feet of separation (GHD, 2012). Because of the geologic uplift that occurs in the Trinidad Area, the worst case scenario (highest projected sea level rise with lowest projected uplift) for the amount of sea level rise by the year 2065 was estimated to be approximately 24 inches, or two feet. The infiltrators require three feet of separation to groundwater, and three feet of soil cover, and are proposed to be 6 feet in diameter, for a total required depth to groundwater of 12 feet. Even with sea level rise, there will be 13 feet of separation between the ground surface and maximum groundwater levels. Therefore, the proposed project will not be affected by coastal flooding or sea level rise.

Due to the known seismic activity in the Pacific Rim, a tsunami or seiche could impact Trinidad. The tsunami runup zone is identified in the *Tsunami Inundation Map for Emergency Planning, Trinidad Quadrangle* (Attachment 15). The tsunami run-up elevation is approximately 40 feet above mean sea level depending on the local topography (Humboldt County 2018).

USDA Rural Development NEPA Environmental Assessment

5.3 Wetlands

According to the U.S. Fish & Wildlife Service (USFWS) National Wetland Inventory, no wetlands are known to occur in the project area (Attachment 16). According to the NRCS Web Soil Survey, the soils within the project area fall into three different mapping units. These soils are classified as moderately well-drained, and listed as having no frequency of flooding or ponding with no hydric soil rating (Attachment 12).

A groundwater study and geotechnical analysis was completed for all phases of the Trinidad ASBS Stormwater Improvement Project (GHD 2012, Attachment 17). The aquifer below the project area is basically composed of sand on top of bedrock (Franciscan Complex). Water quickly moves through the sandy aquifer both vertically and laterally, so groundwater elevations do not change dramatically even with significant rainfall. Within the Phase 2 project area, groundwater elevations ranged from 14.4 to 39.0 feet below the ground surface at the end of the wet season to 19.5 to 42.9 feet below the ground surface at the end of the dry season. The greatest fluctuation in the water table (approximately 5 ft.) was found in the Harbor Area parking lot, but still did not get anywhere near the ground surface. No confining layers, other than the bedrock, or wetlands were identified.

Therefore, no wetlands will be adversely affected by the proposed project.

5.4 Water Resources

5.4.1 Drainage

The Trinidad Planning Area is 15.5 square miles (9,924 acres) in area and contains the watersheds of 13 coastal streams. The major coastal streams that flow through City boundaries are Mill Creek, McConnahas Mill Creek, and Parker Creek. The most sensitive watershed in the Planning Area is Luffenholtz Creek as it is the City's sole source of drinking water. Luffenholtz Creek is located entirely outside of City boundaries. The City has designated both Luffenholtz and Mill Creek (the City's undeveloped secondary water supply) as "Critical Water Supply Areas" (TRWMMWG 2008). The proposed project will not require any additional water withdrawals.

There are no streams or rivers flowing through or near the project site. Work within the existing Edwards Street right-of-way will not alter drainage patterns. The proposed project will require City approval of a grading permit consistent with Chapter 15.16 (Grading) of the Trinidad Municipal Code. Drainage and erosion control plans to be approved by the City Engineer will be required as part of that process. Therefore, the proposed project will not 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.

5.4.2 Groundwater

The City of Trinidad is underlain by the 718,263 acre Mad-Redwood Groundwater Basin. Annual recharge of the Basin exceeds water withdrawals, and thus the basin is not in overdraft (Humboldt County, 2002). The City of Trinidad has a municipal water system, and there are no wells within the

USDA Rural Development NEPA Environmental Assessment

project area. Most of the proposed project improvements will occur within already paved and compacted gravel areas.

A review of the City's groundwater model was conducted by HydrolGeologic, Inc. and is summarized in the memo included as Attachment 7. The model was found to be consistent with the conceptual model outlined in the Geotechnical Analysis Report (Attachment 17). The model was verified against observed potentiometric elevations and was found to be consistent with field observations.

As described in more detail below, dewatering of the construction work area could be required if groundwater accumulates in an excavation area. Dewatering typically involves pumping water out of the excavation area to lower groundwater levels to the extent needed for construction. Any water table draw-down during project construction would be very minor and localized and would not affect the ability of any off-site wells to draw water; there are no private wells within the City limits. However, according to the groundwater study and model developed for this project, no groundwater is expected. In addition, no groundwater has been encountered during construction of Phase 1 of the project.

Following construction of the project, there will be a positive direct operational effect on the City's groundwater table and groundwater recharge by increasing infiltration without any detrimental impacts to streams, septic systems and bluff stability. Precipitation within the project area would continue to infiltrate into the ground with additional infiltration through infiltration basins. The project would not interfere with groundwater recharge and there would be no impact to groundwater supplies or groundwater recharge from construction and operation.

Therefore, groundwater will not be adversely affected by the proposed project.

5.4.3 Water Quality

The kelp beds around Trinidad Head, which includes most of Trinidad Bay, are designated as a State Water Quality Protection Area (SWQPA) – Area of Special Biological Significance (ASBS) and a Critical Coastal Area. In addition, Trinidad State Beach is listed on the Clean Water Act Section 303(d) list for bacterial contamination. Trinidad's fishing/crabbing, tourism/recreation industries and drinking water supplies are susceptible to non-point source (NPS) pollution. The City must adhere to the strict water quality standards of the CA Ocean Plan due to the presence of the Kelp Beds at Trinidad Head SWQPA/ASBS. The CA Ocean Plan prohibits discharges into a SWQPA/ASBS. The water quality in streams and seeps within the City's Planning Area impact the ocean water quality as the streams and seeps empty into the ocean. Therefore, nearshore and offshore water quality issues are related. Three primary threats to water quality have been identified through the City's watershed planning efforts, which are: sediment, OWTS, and stormwater (TRMMWG 2008). This stormwater project was identified as a priority project in the TICWMP, and this project is funded by a grant from the State Water Resources Control Board in order to project the ASBS.

Trinidad State Beach and ocean waters could be potentially affected by runoff from project construction activities. Construction of the project would require the use of gasoline and diesel-powered equipment;

USDA Rural Development NEPA Environmental Assessment

this could include such as trucks, excavators, graders, drillers, bulldozers, backhoes, compactors, and generators. Chemicals such as diesel, gasoline, lubricants, hydraulic fluid, transmission fluid, paints, solvents, glues, and other substances would be utilized during construction. An accidental release of any of these substances could degrade surface or ground water and cause adverse impacts, particularly if this were to occur in an area that drains towards the ASBS. Incorporation of Mitigation Measure 1 will ensure that such impacts would be less than significant.

The project is subject to the City's grading ordinance and stormwater ordinance. A grading permit will be required for the project along with an erosion control plan that incorporates appropriate BMPs from the City's grading ordinance and the Humboldt Low Impact Development Stormwater Manual. Therefore, the proposed project will not violate any water quality standards or waste discharge requirements.

Dewatering of the construction work area could be required if groundwater accumulates in excavation areas. The discharge of construction dewatering could result in a source of sediment-laden water to local waterways if not properly controlled. However, the construction will take place during the summer when groundwater levels are at their lowest. In addition, it is unlikely that dewatering would be required, because no groundwater was detected at the proposed excavation levels in the geotechnical investigations. Further, no groundwater has been encountered during construction of Phase 1 of the project.

Mitigation Measure 1: Water Quality BMPs to be Implemented During Construction

- At all times during construction activities, the contractor shall minimize the area disturbed by excavation, grading, or earth moving to prevent the release of excessive fugitive dust. During periods of high winds (i.e. wind speed sufficient that fugitive dust leaves the site) contractor shall cover or treat areas of exposed soil and active portions of the construction site to prevent fugitive dust.
- No construction materials, equipment, debris, or waste shall be placed or stored where it may be subject to wind, or rain erosion and dispersion. Material handling on and offsite shall be required to comply with California Vehicle Code Sec. 23114 with regard to covering loads to prevent materials spills onto public roads.
- All construction equipment shall be equipped and maintained to meet applicable EPA and CARB emission requirements for the duration of construction activities.
- Throughout construction, contractor shall maintain adjacent paved areas free of visible soil, sand or other debris.
- If stockpiled on or offsite, or if rain is expected, soil and aggregate materials shall be covered with secured plastic sheeting and runoff shall be diverted around them.
- Drainage courses, creeks, or catch basins shall be protected with straw bales, silt fences, and/or straw wattles.
- Storm drain inlets shall be protected from sediment-laden runoff with sand bag barriers, filter fabric fences, straw wattles, block and gravel filters, and excavated drop inlet sediment traps.

USDA Rural Development NEPA Environmental Assessment

- Vehicle and equipment parking and vehicle maintenance shall be conducted in designated areas away from creeks or storm drain inlets.
- Major maintenance, repair, and washing of vehicles and other equipment shall be conducted offsite or in a designated and controlled area.
- Construction debris, plant and organic material, trash, and hazardous materials shall be collected and properly disposed.
- Any areas of bare soil disturbed during construction that are not paved will be re-seeded or planted with native vegetation or a locally appropriate seed mix.

With implementation of Mitigation Measure 1, the project will not affect water quality.

5.5 Coastal Resources

As described above in Section 5.1.1, the project area is located completely within the California Coastal Zone. The City has a Local Coastal Program (LCP) that has been certified by the CCC as adequate to carry out provisions of the Coastal Act. Therefore, the City is authorized to issue CDPs in most of the City. However, the easternmost harbor parcel (042-071-008) is in an Area of Deferred Certification (ADC). This is an area in which the California Coastal Commission (CCC) has not certified the City's land use ordinances, and therefore retains jurisdiction over issuance of Coastal Development Permits (CDPs). The remainder of the project is within the City's CDP jurisdiction, but within the area that is appealable to the CCC. A letter is attached (Attachment 18) in which Mark Delaplaine, Manager of the Energy, Ocean Resources and Federal Consistency Division of the California Coastal Commission, has indicated that the project is consistent with the Coastal Act.

5.6 Biological Resources

5.6.1 Overview of Fish, Wildlife, and Vegetation

The Trinidad Planning Area, and even the small area of the City itself, has a relatively high diversity of habitat types. Habitats vary considerably from conifer and hardwood forests to coastal scrub and sandy beaches, to kelp beds and offshore rocks that include both intertidal and subtidal areas. Riparian vegetation is located along portions of all thirteen of the coastal streams in the planning area. This vegetation protects the quality of the water, minimizes soil erosion and sedimentation, and provides valuable habitat for a wide variety of animals.

Kelp beds to the south and west of Trinidad Head are a biological resource important to the local fisheries and the State, demonstrated by their Critical Coastal Area (CCA), Area of Special Biological Significance (ASBS), and State Water Quality Protection Area (SWQPA) designations. Offshore rocks, inter-tidal areas, and beaches provide habitat for marine protists and invertebrates, seabirds and marine mammals. Areas that are accessible during low tide are susceptible to predators and curious beachcombers. Offshore rocks are now protected as part of the CA Coastal National Monument, sections of the coast managed by the Bureau of Land Management. Management will coincide with the regulations enacted by the Marine Life Protection Act (MLPA).

USDA Rural Development NEPA Environmental Assessment

Trinidad has several Environmentally Sensitive Habitat Areas (ESHAs) including, but not limited to, portions of coastal bluffs, biologically rich tide pools, nesting grounds, kelp beds, streams, riparian habitats, and rare, threatened, or endangered plants or plant communities. The City recognizes and utilizes ESHA definitions and designations in accordance with current Coastal Act regulations, Dept. of Fish and Wildlife requirements and CA Native Plant Society policies / recommendations. The project is not likely to affect rare plant species or their habitats, due to the lack of habitat within the project area.

Areas that may contain ESHAs include, but are not limited to, areas indicated in Attachment 19. The ESHAs shown on Attachment 19 are based on the best information available at the time mapping was done. The boundaries of ESHAs identified on this map are not intended to be definitive, but to identify the general location of sensitive environmental resources. Detailed locations and boundaries of these resources have not been precisely mapped.

An evaluation was conducted for the potential presence or absence of habitat for special status plant and animal species (Attachment 20). CNDDDB RareFind (CDFW, 2018a), BIOS (CDFW, 2018b), and CNPS (CNPS, 2018) searches were completed for the 7.5-minute USGS Trinidad quadrangle and all adjacent quadrangles. The aforementioned databases were queried for historical and existing occurrences of special status plants and animals. In addition, a list of all federally listed species that are known to occur or may occur in the vicinity was obtained from the USFWS Information for Planning and Conservation (IPaC) database (USFWS, 2018a).

The potential for occurrence of special status plant and animal species reported from the queries were then evaluated based on the habitat requirements of each species relative to the conditions observed during the field surveys.

Each species was evaluated for its potential to occur in the study area according to the following criteria:

- **None.** Species listed as having “none” are those species for which:
 - there is no suitable habitat present in the study area (that is, habitats in the study area are unsuitable for the species requirements [for example, elevation, hydrology, plant community, disturbance regime, etc.]).
- **Low.** Species listed as having a “low” potential to occur in the study area are those species for which:
 - there is no known record of occurrence in the vicinity, and
 - there is marginal or very limited suitable habitat present within the study area.
- **Moderate.** Species listed as having a “moderate” potential to occur in the study area are those species for which:
 - there are known records of occurrence in the vicinity, and
 - there is suitable habitat present in the study area.

USDA Rural Development NEPA Environmental Assessment

- **High.** Species listed as having a “high” potential to occur in the study area are those species for which:
 - there are known records of occurrence in the vicinity (there are many records and/or records in close proximity), and
 - there is highly suitable habitat present in the study area.
- **Present.** Species listed as “present” in the study area are those species for which:
 - the species was observed in the study area.

Of primary concern for this project are the federally and state listed species below:

Marbled Murrelet (*Brachyramphus marmoratus*)- Federally Threatened, State Endangered.
Bald Eagle (*Haliaeetus leucocephalus*)- Federally Delisted, State Endangered
California Brown Pelican (*Pelecanus occidentalis californicus*)- Federally & State Delisted, State Fully Protected

No special status plant or animal species were observed during the natural resources assessment field visit on April 4 and July 27, 2018.

With respect to the land use regulations, the City’s Open Space (OS) and Special Environment (SE) designations encompass the City’s major creeks, wetland, riparian, shoreline, and other ESHAs. Because development in OS and SE areas is very restricted, land use designations help to protect these sensitive coastal resources. Smaller areas may not be specifically designated OS or SE or even identified on resource maps, but will be protected by policies contained in this section when identified during development proposals.

5.6.2 Endangered Species Act

The existing residential landscape in the project area does not provide any habitat for the threatened and endangered species listed above. These species may utilize the surrounding pelagic habitat adjacent to the project area but are not likely to be affected by project activities. The nearest designated critical habitat is 4.5 miles to the north for Marbled Murrelet. No consultation with USFWS or NMFS is needed for this project for the protection of threatened and endangered species. No threatened or endangered plants have potential to occur and none were observed during seasonally appropriate surveys of the project area. The project will have no effect on special status species.

5.6.3 Migratory Bird Treaty Act

The project will take place within existing, developed roadways and parking areas. These areas are paved with asphalt or with compacted gravel. Vegetation that grows along the edges of these areas is limited to grasses and forbs that are regularly mowed and disturbed by foot and vehicular traffic. No shrubs or woody vegetation will be disturbed by this project.

USDA Rural Development NEPA Environmental Assessment

The offshore rocks around Trinidad are designated as an Important Bird Area by the Audubon Society (Attachment 21). These offshore rocks are also part of the California Coastal National Monument and administered by BLM. These resources are already protected and will not be affected by the project.

Disturbance from construction activities will temporarily elevate noise levels but nesting birds protected by the MBTA are not likely to be affected by this project due to the proximity of the proposed construction within the right of way of an existing well-traveled road way. Birds are not likely to initiate a nest within direct influence of the project area. Pre-construction nesting bird surveys have been incorporated into the project with Mitigation Measure 2. Therefore, the project does not have the potential to adversely affect nesting birds.

Mitigation Measure 2: Pre-construction bird surveys during nesting season

If project-related brush clearing or construction work must occur during the breeding season (February 15-August 15), nesting bird surveys should be performed weekly by a qualified biologist within the active construction area to ensure that active nests are not destroyed.

With implementation of Mitigation Measure 2, the project will not affect nesting birds.

5.6.4 Bald and Golden Eagle Protection Act

The project will take place within existing, developed roadways and parking areas. These areas are paved with asphalt or with compacted gravel. Vegetation that grows along the edges of these areas is limited to grasses and forbs that are regularly mowed and disturbed by foot and vehicular traffic. No shrubs or woody vegetation will be disturbed by this project. No adequate nesting structures for eagles exist within the project area and the closest known eagle's nest is 19 miles to the southeast. Therefore, the project will have no effect on eagles.

5.6.5 Invasive Species

Invasive plant species are often found along road sides with little to no tree canopy, especially with opportunity to colonize after disturbance from road construction and maintenance. Re-seeding or planting any bare soil along the road side with native vegetation after project completion can reduce the chance of invasive plant colonization (see Mitigation Measure 1). As described in Section 5.4.3, groundwater is not expected to be encountered during excavation. In addition, no open trenches will remain following construction. Therefore, there is no risk of American bullfrog (*Lithobates catesbeianus*) moving into the project area as a result of the project. Following these guidelines, the project is not likely to encourage invasive species to colonize the area post-construction.

5.7 Cultural Resources and Historic Properties

The project area has a rich cultural past including pre-historical use centered on the food resources of the ocean, historical use centered on fur trading, gold, whaling, timber and fishing, and more recently based on commercial and sport fishing and recreational opportunities presented by the accessible and scenic coastline. Although the project will not cause demolition of any structures, there may be cultural artifacts on or below the surface that could be disturbed by the project.

USDA Rural Development NEPA Environmental Assessment

The City of Trinidad is located within the ancestral lands of the Yurok People, which extend from Little River just south of Trinidad, along the coast north to Damnation Creek in Del Norte County, and inland along the Klamath River. The Yurok Village of Tsurai, in existence since prior to 1700 AD, was located on the southern bluffs of the City in what is now known as the Tsurai Study Area. However, the Village territory extended well beyond the boundaries of the existing City Limits.

An archaeological survey was conducted by William Rich and Associates-Cultural Resource Consultants (WRA) for the proposed project; the report is included as Attachment 22. The purpose of the report was to document whether historic properties / historical resources are present within the proposed project Area of Potential Effects (APE). The methods detailed in the investigation include a review of the files at the Northwest Information Center (NWIC), a review of archaeological and historical literature pertinent to the APE and general region, correspondence with the Trinidad Rancheria, Tsurai Ancestral Society and the Yurok Tribe, as well as a pedestrian field survey within the APE.

The NWIC resource and survey files indicate that five previous investigations have covered portions of the APE. Fifteen additional investigations have been conducted within ½ mile radius, but outlying the APE. Multiple cultural resources have been recorded as a result of the studies in the Trinidad area, however none are located within the specific APE. Resources that are in close proximity include an historic period refuse dump, a grave site, and the Yurok village of Tsurai. The entire project area is, however, within a general location of cultural significance associated with the larger use areas of Tsurai Village, and the historical townsite of Trinidad. It is expected that historic period and ancient Native American archaeological deposits are present.

The purpose of the ethnographic and historical research completed during this investigation was designed to identify the locations of known cultural resources at the APE for the proposed project. This was an important part of the investigation because a majority of the APE contains disturbed, paved over, or built on surfaces. The historical section of the Archaeological Survey Report provides an historic context, following the sequence of cultural settlement in Trinidad. This research indicates that the proposed project is situated in Yurok territory with Yurok Tribe, Trinidad Rancheria, and the Tsurai Ancestral Society having cultural affiliation and interest in the project location. The Town of Trinidad is listed as a California Historic Landmark #216 and is one of the oldest towns on California's north coast.

Because the proposed project will not alter built environment cultural resources, and because the completed work will have no residual visual effects to the project area, no historic period buildings and structures were evaluated as part of the cultural resources investigation. No artifacts, archaeological features, sites or other specific cultural resources were encountered during the investigation.

In addition to the consultation with the Trinidad Rancheria, Yurok Tribe and Tsurai Ancestral Society as part of the cultural resources investigation, USDA sent letters to the other Tribes listed by the Native American Heritage Commission as having an interest in the area (Attachment 23). These included Big Lagoon Rancheria, Blue Lake Rancheria, Hoopa Valley Tribe, Karuk Tribe, Bear River Band of Rohnerville Rancheria, Round Valley Indian Tribes of the Round Valley Reservation, Wiyot Tribe and Tsnungwe

USDA Rural Development NEPA Environmental Assessment

Council. The Blue Lake Rancheria declined the offer of Section 106 consultation (Attachment 24). No other response from those groups was received.

The Trinidad Rancheria, Tsurai Ancestral Society and the Yurok Tribe have all shared a similar interest in the project, and have indicated that significant ceremonial places and elements of the ethnographic landscape, such as the village of Tsurai and surrounding areas; particularly, Trinidad Head are present as are considered profound spiritual sites to Yurok people. All three tribal groups have requested Native American monitoring during project implementation. Furthermore the Yurok Tribe suggested that the project be designed in a way to limit unnecessary excavations and offered consideration to reduce the infiltration structures to a single system to the lowest point at the beach parking lot.

It is likely not feasible to infiltrate all or even most of the stormwater in the harbor parking lot. However, the City is exploring the possibility of increasing the infiltration in that area to reduce the need to excavate elsewhere. In addition, the City is looking at alternatives to the large infiltrator on Ewing Street and is working with the HSU Marine Lab to design a series of smaller infiltration basins further to the east on HSU property and further down the hill along Edwards Street.

The overall finding of the cultural resources investigation was: *“based on research and a surface survey is that, although much of the survey area is obscured by pavement, no historic properties will be affected within the proposed project area. WRA believes that the survey is adequate to identify any potential surface archaeological resources within the project area that would qualify for the NRHP.”*

Although no specific Native American or historic period archaeological sites are known directly in the APE, it is anticipated that such deposits may exist. The southern portion of the proposed project area lies close to the known Yurok Village site of Tsurai. The surrounding areas, including all of the Trinidad townsite and head, as well as, the coastal margin to the north and south are part of an associated cultural landscape with immeasurable significance to the Yurok people, who are now part of the Trinidad Rancheria, Tsurai Ancestral Society, and Yurok Tribe.

The project is also near the old Gold Rush town center and the project area runs through one of the oldest cities in California raising the possibility of encountering Euroamerican historic resources. Because of the sensitivity of the entire Trinidad area, there is a risk of encountering Native American and/or Euroamerican historical resources. For these reasons, it is recommended that Yurok tribal monitor(s) from either the Trinidad Ancestral Society, Trinidad Rancheria or Yurok Tribe be present during any ground disturbing activities associated with this project. Tribal monitor(s) should have experience monitoring for Yurok tribal cultural resource during excavation projects and should be competent to identify significant resource types and have the ability to stop work when needed. It is also recommended that a monitoring plan with directives in the event human remains are discovered by developed and approved by the Trinidad Ancestral Society, Trinidad Rancheria and Yurok Tribe prior to the beginning of work. Mitigation Measure 3 has been incorporated to implement these recommendations.

USDA Rural Development NEPA Environmental Assessment

Mitigation Measure 3 – Cultural and Historic Resource Protections

The following recommendations are designed in accordance with the expressed concerns of the contact Trinidad area Tribes and will be incorporated into the project as mitigation:

1. A Monitoring Plan/NAGPRA Plan of Action be put in place prior to permit approval, thereby setting up a formal agreement between the stakeholders regarding the plan for items discovered and excavated dirt removed during project implementation.
2. It is recommended that any grading or earthwork activities within the project area be monitored tribally appointed monitors.
3. Cultural resource monitors must be empowered to halt heavy equipment operations in the event that significant cultural features or human remains are uncovered. Construction activities in the immediate vicinity would be delayed until an archaeologist, qualified to the Secretary of Interior Standards, has assessed the significance of the find. An Inadvertent Discovery Protocol, developed in consultation with the Yurok Tribe and Trinidad Rancheria, will be in place prior to construction.
4. The Cultural resource monitor(s) must be kept informed by the contractor and understand the ground disturbance schedule. Field notes should be kept by the monitor(s) and a brief letter report of the monitoring effort filed with the North Coastal Information Center.

With incorporation of Mitigation Measure 3, the project will not adversely affect cultural and historic resources or properties.

5.8 Aesthetics

Trinidad is a highly scenic area in general. Views in Trinidad are exceptional in every direction. To the west and south views include the Pacific Ocean, Trinidad Head, coastline and offshore rocks. Views to the north and east include dense forest, mountains, and rural residential development. Trinidad Bay and the bay bordering Trinidad on the west, including all their islands, offer two of the most uniquely beautiful views that can be found along the California coastline, combining ocean, islands, bay and rugged, timber shorelines. Views to, from, and along the coastline are protected by the Coastal Act. One of the main reasons that residents and visitors come to Trinidad is its scenic beauty.

The project area contains important coastal views. Views of the ocean, coastal foothills, and other visual resources in the Trinidad area may be temporarily altered by equipment, construction materials, and workers during active construction in any given section of the project site. The changes to the views would be minor, temporary, and would generally be visible only to the public in the immediate vicinity of the active portion of construction. Upon completion of the project, there would not be readily discernible alterations to the visual nature of the area or any obstructions to scenic vistas

Construction will primarily be limited to within existing, developed roadways and parking areas. Project activities would be seen by residents and visitors of Trinidad during construction. Post construction,

USDA Rural Development NEPA Environmental Assessment

most of the stormwater improvements will not be visible, including the infiltration basins and galleries and underground storm drain systems. Visible elements post construction, include new drain inlets, manhole covers and curbing, which will have minor visual impacts.

The project would include only minor temporary obstructions or changes to the visual environment related to construction. Subsurface construction would be accomplished through horizontal drilling and/or open-cut trenching methods, which upon site restoration would not be noticeably different from pre-project conditions. Visible elements of the project would likely include temporary stationary and mobile heavy equipment and vehicles, materials storage and staging, workers, and disturbances to the ground surface and roads. These visual changes may be expected to last for the duration of construction, which would occur relatively rapidly in any one location (maximum of six weeks) as the project improvements are completed. The primary staging area may experience noticeable visual temporary changes for the duration of the project, which is expected to be five to six months.

5.9 Air Quality

The project area is located within the North Coast Air Basin and within the jurisdiction of the North Coast Unified Air Quality Management District (NCUAQMD), which encompasses Del Norte, Humboldt and Trinity Counties. The North Coast Air Basin, which extends all the way into Sonoma County, is currently listed as being in “attainment” or is “unclassified” for all Federal health protective standards for air pollution. However, under State ambient air quality standards, the North Coast Air Basin (Humboldt and Mendocino Counties) has been designated “nonattainment” for 24-hour and annual particulate matter less than ten microns in size (PM-10) (CARB 2015). Both natural and anthropogenic sources of particulate matter in the NCAB have led to the PM-10 nonattainment designation.

Under the federal Clean Air Act of 1977, the US EPA is required to identify National Ambient Air Quality Standards (NAAQS) to protect public health and welfare. The EPA has established NAAQS for six criteria air pollutants (Carbon Monoxide, Lead, Nitrogen Dioxide, Ozone, Particle Pollution and Sulfur Dioxide), but the NCAB does not exceed these federal pollutant thresholds. Under the California Clean Air Act, the California Air Resources Board (CARB) has adopted more stringent standards for the criteria air pollutants. Though it has adopted a particulate matter attainment plan, the NCUAQMD has not established specific thresholds of significance for the other criteria pollutants.

As mentioned above, the NCAB is currently designated as a state non-attainment area for suspended particulate matter (PM10), but does not violate other federal, state, or local air quality standards (CARB 2015). PM-10 air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic diameter of less than 10 microns. Health effects from particulate matter include reduced lung function, aggravation of respiratory and cardiovascular diseases, increases in mortality rate, and reduced lung function and growth in children. Primary human sources of PM-10 emissions include vehicle emissions, construction dust, road dust, open burning of vegetation, wood stoves and stationary industrial sources (NCAQMD 2018). Natural sources of PM-10 include smoke from wildfires as well as airborne salts and other particulate matter naturally generated by ocean surf. Therefore, any use or

USDA Rural Development NEPA Environmental Assessment

activity that generates unnecessary airborne particulate matter may be of concern to the NCUAQMD and requires compliance with Air Quality Regulation 1, Chapter IV, Rule 430.

The project area has no known history of contamination and is not near any industrial uses. The surrounding residential uses and neighborhoods may produce some pollutants in the form of smoke from wood burning fireplaces, exhaust from vehicles and pollutants from other household chemicals. Salt air and fog can also be sources of PM-10 common in Trinidad.

Air quality impacts can be divided into two phases for a project; construction and operation. Other than a vehicle used for occasional maintenance, the operation of the project will not generate stationary or mobile sources of pollutants.

The NCUAQMD's Regulation 1 prohibits nuisance dust generation, such as that generated by construction activity. Pursuant to Air Quality Regulation 1, Chapter IV, Rule 430 – *Fugitive Dust Emissions*, the handling, transporting, or open storage of materials in such a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including, but not limited to: (1) covering open bodied trucks when used for transporting materials likely to give rise to airborne dust; and (2) the use of water or dust suppressants for control of dust in the removal of existing improvements, construction operations, the grading of roads or the clearing of land.

Prior to construction, the project is required to obtain a Coastal Development Permit and Grading Permit from the City. Municipal Code Section 15.16.080 allows the City to put conditions on permit approvals in order to control dust and other nuisance impacts. In addition, §15.16.210.B includes the following minimum requirements: *"All graded surfaces shall be wetted, protected, or contained in such a manner as to prevent a nuisance from dust or spillage. Equipment and materials on the site should be used in such a manner as to avoid excessive dust and noise."* To reduce potential impacts to air quality, standard construction BMPs, including actions consistent with the NCUAQMD Particulate Matter Attainment Plan that would substantially reduce dust and other air pollutants during the construction period, have been incorporated into the project as Mitigation Measure 4.

Mitigation Measure 4 – Implement Air Quality Emission Control Measures during Construction

Although the North Coast Unified Air Quality Management District (NCUAQMD) has not adopted formal construction measures or guidelines, the project includes the following air quality control actions to reduce construction-generated emissions:

The principal concern about the effect of construction projects on air quality relates to the potential for earthwork and other activities to generate dust, including inhalable particulate matter (PM10) that poses a human health hazard. To address the potential for dust generation, the contractor will be required to implement the following BMPs to reduce nuisance dust and other sources of PM10. These actions will also apply to ground disturbing maintenance activities and equipment exhaust.

USDA Rural Development NEPA Environmental Assessment

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered as necessary during dusty conditions.
- If loose material becomes airborne during transportation, haul trucks transporting soil, sand, or other loose material off-site will be covered.
- Disturbed roadways will be re-paved as soon as possible following work in the area, as appropriate.
- Visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers, as necessary. The use of dry power sweeping is prohibited.
- Idling times will be minimized by shutting equipment off when not in use.
- Construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications.

With incorporation of Mitigation Measure 4, the project will not adversely affect air quality.

5.10 Socio-Economic Impact Assessment / Environmental Justice

The population of the City of Trinidad from the 2010 U.S. Census is 365. Trinidad's population decreased between 1980 and 2000, but then increased somewhat between 2000 and 2010. The total number of housing units in the City is a little over 200. Within the City of Trinidad, median incomes are higher than in other areas of the County, though the census tract that includes the City has a higher proportion of lower income households. The proposed stormwater improvements will be located within and along existing roads and trails, and will mostly be located within the most densely developed residential area of town. And EPA EJScreen Report shows that the project area is in a block group with a density of 137 people per square mile, 25% minority population, 32% low income population, and a per capita income of \$28,935 (Attachment 25). A variety of demographic and economic data tables from the 2010 Census for the City of Trinidad are included as Attachment 26.

The proposed project is not located in an area that would negatively and disproportionately affect minorities, women, persons with disabilities, or low-income populations. Nor is it the type of project that would cause such impacts. No major environmental justice or civil rights impacts are likely to occur as a result of the project. Attachment 27 includes Form RD-2006-38, Environmental Justice (EJ) and Civil Rights Impact Analysis (CRIA) Certification, prepared by Rural Development.

5.11 Miscellaneous Issues

5.11.1 Noise

The project site and surrounding area are primarily characterized by low density residential uses, open space and recreational uses. Highway 101 is located to the east, and the Pacific Ocean to the west and south. Noise levels in the project area vary depending on the proximity to human activity, Highway 101, and commercial activities in Trinidad. Depending on the weather and proximity to the coast, wind and waves can also be significant noise generators. Noise sensitive receptors and noise sensitive uses in the project area include residences, lodging establishments, churches and recreational trails; Trinidad Elementary is located approximately 500 ft. north of the project.

USDA Rural Development NEPA Environmental Assessment

The California General Plan Guidelines include guidelines for noise-compatible land uses. The Land Use Noise Compatibility Matrix within Trinidad’s Draft Noise & Safety Element (2012) specifies that the hourly Leq of 45 dB Leq indoors and 55 dB Leq outdoors are the maximum level below which there are no effects on public health and welfare for residences, lodging, commercial and nursing homes; however, higher outdoor levels are identified as “normally acceptable” (60 to 70 dB Ldn) and “normally unacceptable” (70-80 dB Ldn). For libraries, schools and churches the hourly Leq of 45 dB indoors and 55 dB Leq outdoors are the noise level performance standards for new projects affected by or including stationary sources.

Construction Phase

The construction phase of the project would require the use of heavy equipment for trench excavation and would temporarily increase ambient noise levels for the duration of the project. Construction activities would also involve the use of smaller power tools, generators, and other sources of noise. During construction, noise levels would vary based on the amount of equipment in operation and the location of the activity. With regard to any given point at the various LID/BMPs stormwater improvement locations, the loudest construction operations would occur for only the limited duration of up to approximately one to two weeks during the day. Noise levels would be consistent with the reference noise levels in Table 1: Construction Equipment Reference Noise Levels as Measured at 50 feet, below.

Based on the reference noise levels, above, the noise levels generated by construction equipment at the project site may reach a maximum of approximately 85 dB Leq at 50 feet during site excavation, construction and repaving disturbed streets. The closest sensitive receptors are neighboring homes, some of which are less than 50 ft. away from the construction area. These would be in close proximity to construction equipment and activities using backhoes, excavators, paving equipment, compactors and rollers. Therefore, it is likely that some of the residences in Trinidad would experience exterior noise levels near the full reference levels (up to 85 dB Leq) listed in Table 1.

Table 1. Construction Equipment Reference Noise Levels as Measured at 50 feet¹ (dB²)

Equipment	Noise Level	Equipment	Noise Level
Drill Rig Truck	84	Jackhammer	85
Horizontal Boring Hydraulic Jack	80	Large Generator	82
Front End Loader or Backhoe	80	Paver or Roller	85
Excavator	85	Dump Truck	84
1. Source: FHWA 2006 2. dB is a weighted decibel measurement for assessing hearing risk and, therefore, is used by most regulatory compliance agencies			

USDA Rural Development NEPA Environmental Assessment

A typical building can reduce noise levels by 15 dB with the windows closed (Humboldt County 2017), thereby reducing interior noise levels within the closest homes (25 feet) to approximately 70 dB Leq. These levels would be higher than the US EPA (1974) maximum recommended interior (45 Ldn) and exterior noise (55 Ldn) levels below which there are “no effects on public health and welfare.” As such, the closest residences would likely experience construction noise levels in excess of noise standards for residential use (albeit temporarily, up to six weeks during the day).

To avoid and minimize adverse effects to sensitive noise receptors, Mitigation Measure 5, Noise Reduction Measures, has been incorporated into the project. Under Mitigation Measure 5 sound abatement actions such as construction hour limitations, and equipment muffler/maintenance requirements will be implemented. With the implementation of Mitigation Measure 5, construction noise would be limited in duration and intensity such that construction noise at sensitive receptors would be less than significant. Additionally, there would be no construction on weekends except with permission from the City as needed to keep the project on schedule.

Operation Phase

Noise at the project site during operation and maintenance will not measurably exceed the existing background noise levels because only infrequent vehicular access, minor repairs, and maintenance would be required. A less than significant effect would occur.

Mitigation Measure 5: Noise Reduction Actions.

During project construction, the following actions will be incorporated into the project to reduce daytime noise impacts to the maximum feasible extent:

- A preconstruction meeting (or conference call) will be held among the City of Trinidad, construction manager, and the general contractor to confirm that the following noise reduction practices are to be implemented in the appropriate phase of construction.
- Hours of construction will typically be limited 7:00 a.m. to 5:00 p.m. Monday through Friday, unless other hours are specified by the City Engineer. No construction would occur on weekends except with permission from the City as needed to keep the project on schedule.
- Semi-stationary equipment (e.g., generators, compressors, etc.) will be located as far as possible from residences.
- Quietest available equipment and electrically-powered equipment will be used, rather than internal combustion engines where feasible.
- Equipment and on-site trucks used for project construction will be equipped with properly functioning noise control devices such as mufflers, shields, and shrouds. All construction equipment will be inspected by construction personnel at periodic intervals to ensure proper maintenance and resulting lower noise levels.

USDA Rural Development NEPA Environmental Assessment

- Impact tools (e.g., jack hammers, pavement breakers, rock drills) used for project construction will be hydraulically or electrically powered wherever possible to avoid noise associated with compressed-air exhaust from pneumatically powered tools.

With incorporation of Mitigation Measure 5, the project will not adversely affect noise.

5.11.2 Transportation

In the City there are approximately 6.27 miles of paved, impermeable roadway. The majority are narrow, local streets, with the exception of Trinity, Main and Edwards Streets that wind through the Commercial and Planned Development /Mixed Use district and provide access to the Harbor and beaches from Hwy 101. Trinidad residents are dependent on a single highway (U.S. Highway 101) for access to major services, employment, and commercial areas. Highway 101 also facilitates visitor access to Trinidad.

The project mostly takes place along Edwards Street, which is designated as a primary collector in the Trinidad General Plan. Improvements are also proposed on Underwood Drive and Ewing and Van Wycke Streets, which is designated as a local street. Edwards is the primary access to the Trinidad Harbor area, and is heavily used; traffic includes commercial delivery vehicles and boat trailers. Underwood and Van Wycke are utilized mainly for local, residential traffic. Although Ewing Street is also a local street, it provides access to the HSU Marine Lab and Trinidad State Beach trail head(s), and is more heavily used than other local streets.

Project activities would generate temporary construction-related traffic and lane/road closures, including: 1) passenger vehicles transporting construction and inspection workers to and from the site, 2) heavy trucks/haulers accessing the site to deliver materials and remove trash and debris, and 3) partial lane/road closures during construction. Road closures are anticipated for Edwards Street during construction of the infiltration basins due to the depth and width of excavation required. Construction along Edwards Street would take approximately six weeks. Only one lane of travel will need to be shut down at any one time on Edwards during installation of the proposed storm drain lines. One lane of travel can be kept open on side streets (Underwood and Ewing) during construction, which will allow access to all areas of the community. Lower Van Wycke is only one lane wide, and so will need to be closed during storm drain line construction, but the duration would be for only a few weeks, and alternative access exists via Galindo.

Project activities would have an anticipated duration of approximately five to six months maximum (summer/fall), assuming five work days per week from the hours of 7:00 a.m. to 5:00 p.m. Monday through Friday, and not on weekends except with permission from the City as needed to keep the project on schedule. Because of the temporary nature of project activities, including vehicle/truck trips and construction duration, project activities would not create a substantial increase in traffic on roads within the project area and on Highway 101.

USDA Rural Development NEPA Environmental Assessment

Given the low traffic level on Trinidad roadways mid-week, and the availability of alternate routes for travel through Trinidad's residential neighborhood, the potential impacts to motor vehicles, pedestrians, and bicyclists would be minor. Additionally, construction would not take place during the Trinidad Fish Festival. To ensure alternate routes remain open and accessible throughout construction, it will be necessary to implement a traffic control plan to ensure that detours are clearly indicated and traffic flow is maintained. Implementation of Mitigation Measure 6 would reduce potentially significant impacts to less than significant.

Mitigation Measure 6: Traffic Control Plan

In coordination with the City of Trinidad, the construction contractor shall develop an approved traffic control plan prior to the commencement of construction. Elements of this plan shall be implemented as necessary and appropriate for construction. The plan shall include, but not be limited to:

- Adherence to City and Caltrans traffic management standards.
- Location(s) of designated project construction staging area(s) for equipment/materials storage and construction worker parking.
- Temporary replacement parking for residents during the construction period, if needed.
- Detour routes will be used in order to maintain access throughout the City and to the coastline during project construction.
- Use of flagging and signage during construction of LID/BMPs stormwater improvements, materials delivery, and/or movement of construction equipment in any private or public roadway.
- Provisions to maintain unobstructed access for law enforcement, fire department, or other official or emergency personnel and vehicles.

With implementation of Mitigation Measure 6, the project will not adversely affect traffic.

The project would not change the geometry of the street or roadway network in Trinidad. Therefore, no potentially hazardous roadway design features would be introduced by the project. The project will not alter the existing emergency access except during construction, and the likelihood of a need for emergency services in this area is very low. Construction would primarily take place in the public ROW near the edge of pavement. This would allow emergency vehicles to pass without disruption. Highway 101 would not be affected by construction and operation of the project. During construction; however, temporary lane/road closures should be coordinated such that emergency access is maintained at all times. Emergency access to the project area already exists from these streets, and would continue to exist under the proposed project. Since the project corridor is already served by TVFD, CALFIRE and the County Sheriff, the project would not slow or hinder emergency response, the project would not require additional emergency services, and there would be emergency access to all project segments.

USDA Rural Development NEPA Environmental Assessment

Due to the nature of the project, its limited size, and location (5.5 miles to the nearest airport), there is limited potential to impact air traffic patterns. Therefore, the project will not 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. The project is located within the city limits of the City of Trinidad, on the west side of Highway 101.

5.11.3 Human Health and Safety

5.11.3.1 *Electromagnetic Fields and Interference*

The project does not involve the construction of any new utilities other than stormwater facilities. Now new power is required to serve the stormwater improvements. The project will not create or impact any overhead high-voltage electrical transmission lines, substations or cellular towers.

5.11.3.2 *Environmental Risk Management*

There are several sources of hazardous materials that can affect Trinidad. Fuel oil spills are a constant threat from towing, parking and operation of fleet vehicles, visitor/ resident/patron parking and delivery vehicles. Business and household hazardous waste has a tendency to accumulate in and around residential areas in the form of cleaners, solvents, lubricants, paints, and adhesives. Machinery or appliance leaks from businesses or construction sites can potentially be uncontained. If these materials are not properly disposed of or recycled they present a serious threat to the health and wellbeing of the residents and the environment.

There are no hazardous materials sites compiled pursuant to Government Code Section 65962.5 (Hazardous Waste and Substances Site List or “Cortese” list) within the project area. The nearest site on this list is the McNamara and Peepe Lumber Mill in Arcata. In addition, records on the SWRCB GeoTracker Website indicate that the closest active site on this list is a LUST cleanup site at Patricks Point State Park which is approximately three miles north of the project area. The project area is not located on a Cortese list or other list of hazardous materials sites and would therefore not create a hazard to the public or environment.

According to the CalEPA Cortese List (Hazardous Waste and Substances Site List pursuant to CA Government Code §65962.5) (CalEPA 2018) Data Resources, including the Department of Toxic Substances Control (DTSC) Envirostor Database (Attachment 28) and the State Water Resources Control Board (SWRCB) Geotracker website (Attachment 27), the project area does not contain any hazardous materials sites. The nearest site on the Cortese List list is the McNamara and Peepe Lumber Mill in Arcata. In addition, records on the SWRCB GeoTracker Website indicate that the closest active site on this list is a LUST cleanup site at Patricks Point State Park which is approximately three miles north of the project area.

Within the greater Trinidad area, there are seven documented LUST Clean-up sites, which area all listed as “Completed – Case Closed.” There is also one permitted underground storage tank at the Chevron station near the entrance to town, which is more than 1,200 ft. from the nearest project component

USDA Rural Development NEPA Environmental Assessment

(Attachment 29). Therefore, the project is not located on any site catalogued on the most recent hazardous materials list compiled pursuant to Government Code Section 65962.5.

Project construction would require the use of hazardous materials such as fuels, lubricants, paints, and solvents. During construction, routine transport of hazardous materials to and from the project area could indirectly result in an incremental increase in the potential for accidents. Caltrans, the Federal Department of Transportation, and the California Highway Patrol (CHP) regulate the transportation of hazardous materials and wastes, including container types and packaging requirements, as well as licensing and training for truck operators, chemical handlers, and hazardous waste haulers. Numerous laws and regulations ensure the safe transportation, use, storage and disposal of hazardous materials. Worker safety regulations cover hazards related to exposure to hazardous materials. Regulations and criteria for the disposal of hazardous materials mandate disposal at appropriate landfills. Because the City, contractors, and other construction service providers would be required to comply with existing hazardous materials laws and regulations for the transport, use, and disposal of hazardous materials, the impacts associated with the potential to create a significant hazard to the public or the environment would be less than significant.

Following construction, the project would not result in the storage or transport of hazardous materials. Therefore, the project will not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. And based on the project location and proposed land uses, the proposed project will not cause or be subject to adverse effects from exposure to hazardous materials contamination.

5.11.4 Corridor Analysis

Although this project is a stormwater improvement project, it is not a true corridor project. Improvements to the existing stormwater system are being proposed, primarily in the form of infiltration chambers in areas already connected to the City's stormwater system. The only improvement in an area that is not connected to the stormwater system is on Underwood Drive, and that is a stand-alone infiltration feature that will not be connected to the existing stormwater system. Other project components are not all linearly connected, and all the improvements are located within existing street rights-of-way or the Harbor parking area.

6. Cumulative Impact:

Based on the analysis contained in this Environmental Assessment, the proposed project is consistent with City planning documents, including the TWICWMP, the Stormwater Management Plan and the ASBS Compliance Plan. The analysis in the Environmental Assessment demonstrates that the project is in compliance with all applicable plans and regulations including the Trinidad Local Coastal Program, the CA Coastal Act, the SWRCB Ocean Plan, etc.

The project has been designed to reduce impacts to the Trinidad Head ASBS from polluted stormwater runoff. Because the proposed improvements are being completed to comply with SWRCB Ocean Plan /

USDA Rural Development NEPA Environmental Assessment

ASBS requirements for stormwater treatment and discharge and would not increase the capacity of the existing stormwater system, there would be no additional growth inducement over what is analyzed in the City's General Plan.

In addition, the project would not produce impacts that considered with other past, present, and probable future projects, would be cumulatively considerable, because potential adverse environmental impacts were determined to be less than significant with implementation of the six mitigation measures identified in this Environmental Assessment.

Therefore, the proposed project will not result in cumulative impacts.

7. Summary of Mitigation

As documented in this EA, project implementation could affect nesting migratory birds, disturb subsurface cultural resources (if present), and result in increased soil erosion and water quality degradation, increased air emissions, and temporarily increased noise and traffic levels. Design features incorporated into the proposed action would avoid or reduce certain potential environmental impacts, as would compliance with existing regulations and permit conditions. Remaining impacts can be reduced to levels that are less than significant through implementation of the mitigation measures presented in this EA and listed below. Because these mitigation measures will be incorporated as conditions of project approval and the City of Trinidad will be responsible for ensuring their implementation, it has been determined that the proposed action will not have a significant adverse impact on the environment.

Mitigation Measure 1: Water Quality BMPs to be Implemented During Construction

- At all times during construction activities, the contractor shall minimize the area disturbed by excavation, grading, or earth moving to prevent the release of excessive fugitive dust. During periods of high winds (i.e. wind speed sufficient that fugitive dust leaves the site) contractor shall cover or treat areas of exposed soil and active portions of the construction site to prevent fugitive dust.
- No construction materials, equipment, debris, or waste shall be placed or stored where it may be subject to wind, or rain erosion and dispersion. Material handling on and offsite shall be required to comply with California Vehicle Code Sec. 23114 with regard to covering loads to prevent materials spills onto public roads.
- All construction equipment shall be equipped and maintained to meet applicable EPA and CARB emission requirements for the duration of construction activities.
- Throughout construction, contractor shall maintain adjacent paved areas free of visible soil, sand or other debris.
- If stockpiled on or offsite, or if rain is expected, soil and aggregate materials shall be covered with secured plastic sheeting and runoff shall be diverted around them.

USDA Rural Development NEPA Environmental Assessment

- Drainage courses, creeks, or catch basins shall be protected with straw bales, silt fences, and/or straw wattles.
- Storm drain inlets shall be protected from sediment-laden runoff with sand bag barriers, filter fabric fences, straw wattles, block and gravel filters, and excavated drop inlet sediment traps.
- Vehicle and equipment parking and vehicle maintenance shall be conducted in designated areas away from creeks or storm drain inlets.
- Major maintenance, repair, and washing of vehicles and other equipment shall be conducted offsite or in a designated and controlled area.
- Construction debris, plant and organic material, trash, and hazardous materials shall be collected and properly disposed.
- Any areas of bare soil disturbed during construction that are not paved will be re-seeded or planted with native vegetation or a locally appropriate seed mix.

Mitigation Measure 2: Pre-construction bird surveys during nesting season

If project-related brush clearing or construction work must occur during the breeding season (February 15-August 15), nesting bird surveys should be performed weekly by a qualified biologist within the active construction area to ensure that active nests are not destroyed.

Mitigation Measure 3 – Cultural and Historic Resource Protections

The following recommendations are designed in accordance with the expressed concerns of the contact Trinidad area Tribes and will be incorporated into the project as mitigation:

1. A Monitoring Plan/NAGPRA Plan of Action be put in place prior to permit approval, thereby setting up a formal agreement between the stakeholders regarding the plan for items discovered and excavated dirt removed during project implementation.
2. It is recommended that any grading or earthwork activities within the project area be monitored tribally appointed monitors.
3. Cultural resource monitors must be empowered to halt heavy equipment operations in the event that significant cultural features or human remains are uncovered. Construction activities in the immediate vicinity would be delayed until an archaeologist, qualified to the Secretary of Interior Standards, has assessed the significance of the find. An Inadvertent Discovery Protocol, developed in consultation with the Yurok Tribe and Trinidad Rancheria, will be in place prior to construction.
4. The Cultural resource monitor(s) must be kept informed by the contractor and understand the ground disturbance schedule. Field notes should be kept by the monitor(s) and a brief letter report of the monitoring effort filed with the North Coastal Information Center.

USDA Rural Development NEPA Environmental Assessment

Mitigation Measure 4 – Implement Air Quality Emission Control Measures during Construction

Although the North Coast Unified Air Quality Management District (NCUAQMD) has not adopted formal construction measures or guidelines, the project includes the following air quality control actions to reduce construction-generated emissions:

The principal concern about the effect of construction projects on air quality relates to the potential for earthwork and other activities to generate dust, including inhalable particulate matter (PM10) that poses a human health hazard. To address the potential for dust generation, the contractor will be required to implement the following BMPs to reduce nuisance dust and other sources of PM10. These actions will also apply to ground disturbing maintenance activities and equipment exhaust.

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered as necessary during dusty conditions.
- If loose material becomes airborne during transportation, haul trucks transporting soil, sand, or other loose material off-site will be covered.
- Disturbed roadways will be re-paved as soon as possible following work in the area, as appropriate.
- Visible mud or dirt track-out onto adjacent public roads will be removed using wet power vacuum street sweepers, as necessary. The use of dry power sweeping is prohibited.
- Idling times will be minimized by shutting equipment off when not in use.
- Construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications.

Mitigation Measure 5: Noise Reduction Actions.

During project construction, the following actions will be incorporated into the project to reduce daytime noise impacts to the maximum feasible extent:

- A preconstruction meeting (or conference call) will be held among the City of Trinidad, construction manager, and the general contractor to confirm that the following noise reduction practices are to be implemented in the appropriate phase of construction.
- Hours of construction will typically be limited 7:00 a.m. to 5:00 p.m. Monday through Friday, unless other hours are specified by the City Engineer. No construction would occur on weekends except with permission from the City as needed to keep the project on schedule.
- Semi-stationary equipment (e.g., generators, compressors, etc.) will be located as far as possible from residences.
- Quietest available equipment and electrically-powered equipment will be used, rather than internal combustion engines where feasible.
- Equipment and on-site trucks used for project construction will be equipped with properly functioning noise control devices such as mufflers, shields, and shrouds. All construction

USDA Rural Development NEPA Environmental Assessment

equipment will be inspected by construction personnel at periodic intervals to ensure proper maintenance and resulting lower noise levels.

- Impact tools (e.g., jack hammers, pavement breakers, rock drills) used for project construction will be hydraulically or electrically powered wherever possible to avoid noise associated with compressed-air exhaust from pneumatically powered tools.

Mitigation Measure 6: Traffic Control Plan

In coordination with the City of Trinidad, the construction contractor shall develop an approved traffic control plan prior to the commencement of construction. Elements of this plan shall be implemented as necessary and appropriate for construction. The plan shall include, but not be limited to:

- Adherence to City and Caltrans traffic management standards.
- Location(s) of designated project construction staging area(s) for equipment/materials storage and construction worker parking.
- Temporary replacement parking for residents during the construction period, if needed.
- Detour routes will be used in order to maintain access throughout the City and to the coastline during project construction.
- Use of flagging and signage during construction of LID/BMPs stormwater improvements, materials delivery, and/or movement of construction equipment in any private or public roadway.
- Provisions to maintain unobstructed access for law enforcement, fire department, or other official or emergency personnel and vehicles.

8. References

California Air Resources Board. 2015. *State Area Designation Maps*. Available at: <https://www.arb.ca.gov/desig/adm/adm.htm>. Accessed 3/15/18.

California Coastal Commission (CCC). 2006. State of the CCAs Report. CCA#4, Trinidad Head. June 9, 2006. Available at: https://www.coastal.ca.gov/nps/Web/cca_pdf/ncoastpdf/CCA4KelpBedsTrinidad.pdf

California Emergency Management Agency (CEMA). 2009. Tsunami Inundation Map for Emergency Planning Arcata North Quadrangle. Accessed online on June 14th, 2018, at: http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps .

California Environmental Protection Agency, Air Resources Board (CARB). 2014. California Air Basin Map. Accessed online on August 12th, 2013 at: <http://www.arb.ca.gov/ei/maps/statemap/abmap.htm>.

CalEPA. 2016. *Cortese List Data Resources*. www.calepa.ca.gov/SiteCleanup/CorteseList/. Accessed July 5, 2018.

USDA Rural Development NEPA Environmental Assessment

City of Trinidad. 2012. *Draft General Plan*.

City of Trinidad. 2016. *City of Trinidad ASBS Compliance Plan, Final Version 1.3*. September 6, 2016.

Federal Emergency Management Agency (FEMA). 2005. Flood Hazard Zones: FEMA Coastal Flood Hazard Analysis and Mapping Guidelines, Focused Study Report. Accessed at:
https://www.fema.gov/media-library-data/20130726-1541-20490-5411/frm_p1zones.pdf

Federal Highway Administration (FHWA). 2006. Construction Noise Handbook Final Report. FHWA-HEP-06-015.

GHD. 2012. City of Trinidad ASBS Stormwater Improvement Project Geotechnical Analysis. October 2012.

Humboldt County, 2002. *Humboldt County General Plan Update, Natural Resources and Hazards Report*. Prepared by Dyett & Bhatia for Humboldt County. September 2002.

Humboldt County. 2018. Humboldt GIS Portal, Planning and Building. Accessed on May 22, 2018 at:
<http://webgis.co.humboldt.ca.us/HCEGIS2.0/>.

North Coast Unified Air Quality Management District (NCUAQMD). 2018. Air Quality Information for the North Coastal. Accessed on July 6, 2018 at: <http://www.ncuaqmd.org/index.php?page=air.quality>

State Water Resources Control Board (SWRCB). 2018. California's Areas of Special Biological Significance. Accessed online on July 6, 2018 at:
https://www.waterboards.ca.gov/water_issues/programs/ocean/asbs_map.shtml

Trinidad Regional Watershed Management Working Group. 2008. Trinidad-Westhaven Integrated Coastal Watershed Management Plan. May 2008. Available at: <http://trinidad.ca.gov/document-library/coastal-watershed-management>

U. S. Census Bureau. 2010. General Population and Housing Characteristics: 2010 Demographic Profile Data. Accessed on June 15, 2018 at:
<https://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF>

Winzler & Kelly. 2008. City of Trinidad Draft Stormwater Management Plan. Appendix G of the TICWMP (TRWMWG 2008). Available at: <http://trinidad.ca.gov/document-library/coastal-watershed-management>

USDA Rural Development NEPA Environmental Assessment

9. List of Preparers

City of Trinidad

Trever Parker, Contract City Planner (SHN)

Rebecca Price-Hall, Grant Coordinator

Daniel Berman, City Manager

Steve Allen, Contract City Engineer (GHD)

SHN

Joseph Saler, Botanist

Gretchen O'Brien, Biologist

Justin Sousa, CAD and GIS Specialist

William Rich and Associates

William Rich M.A. RPA

10. List of Figures

Figure 1: Project Location

Figure 2: Project Vicinity

Figure 3: Area of Potential Effect

Figure 4: Zoning and Project Parcels

11. List of Attachments

Attachment 1: City of Trinidad. 2013. *Notice of Determination, City of Trinidad ASBS Stormwater Improvements Project*. December 19, 2013.

Attachment 2: SWRCB. *Letter informing the City of the "Prohibition of Waste Discharges into the Kelp Beds at Trinidad Head Area of Special Biological Significance."* October 8, 2004.

Attachment 3: City of Trinidad. 2016. *City of Trinidad ASBS Compliance Plan, Final Version 1.3*. September 6, 2016.

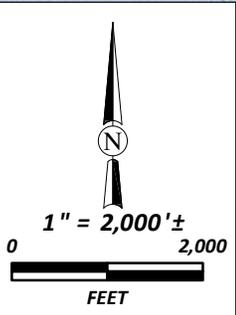
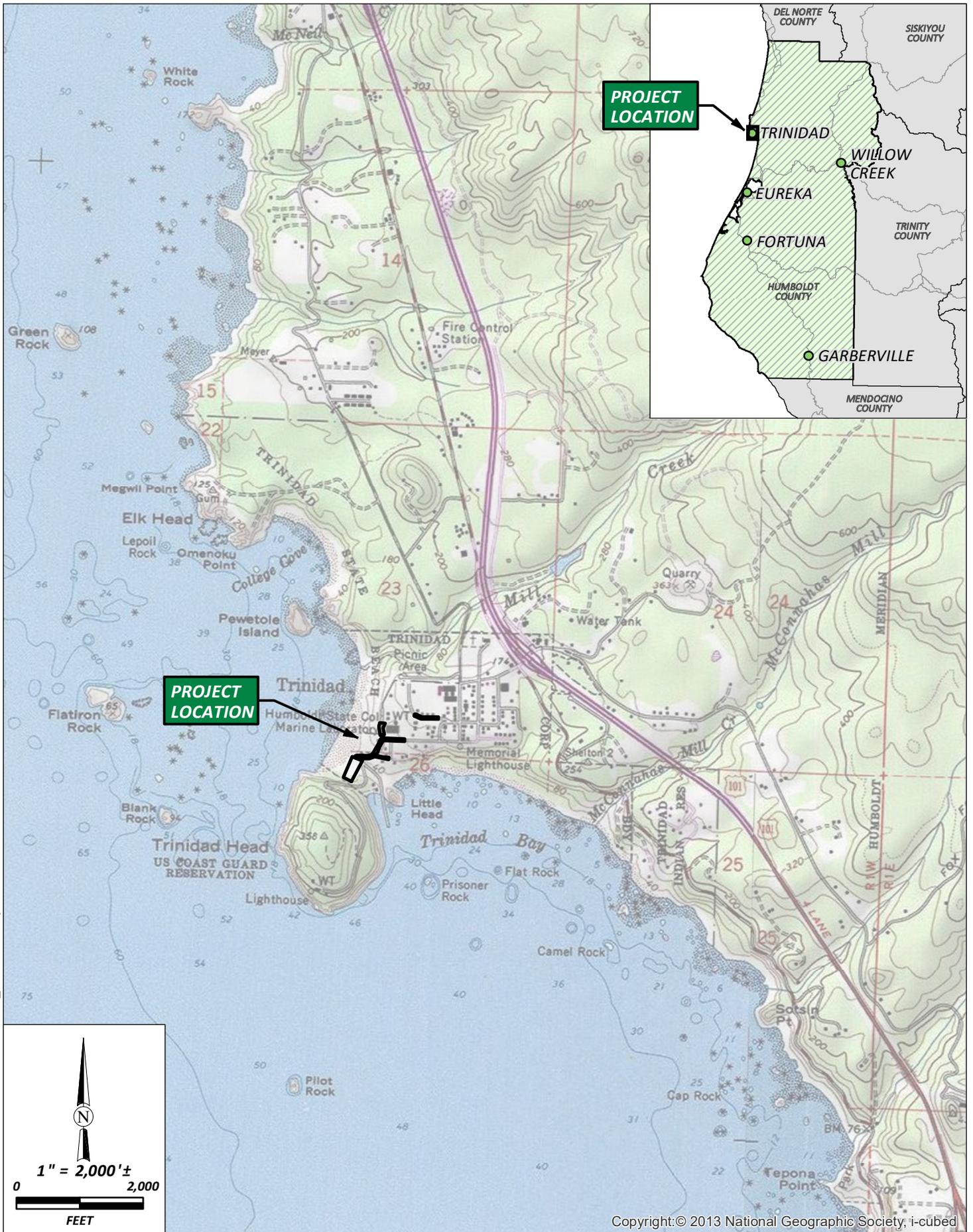
USDA Rural Development NEPA Environmental Assessment

- Attachment 4: GHD. 2018. *Figure 5 of Appendix A of the Preliminary Engineering Report* .January 4, 2018
- Attachment 5: GHD. 2013. *Infiltration Analysis for the City of Trinidad ASBS Stormwater Improvements Project in support of a CEQA Initial Study and Mitigated Negative Declaration*. Adopted December 18, 2013.
- Attachment 6: Crawford and Associates. 2013. *Slope Stability Analysis, Trinidad Stormwater Improvement Project*. October 3, 2013.
- Attachment 7: HydroGeoLogic, Inc. 2013. *Trinidad [Groundwater] Model Review*. September 5, 2013.
- Attachment 8: SWRCB. *Letter granting "Approval of Extension of Time for Compliance with Special Conditions for Municipal Separate Stormwater Sewer Systems (MS4) Discharge inot Areas of Special Biological Significance (ASBS)." June 14, 2018.*
- Attachment 9: GHD. 2018. *USDA Rural Development Funding Application, Preliminary Engineering Report* .January 4, 2018
- Attachment 10: HSU. 2016. *Letter of Support for the City of Trinidad Storm Water Management Improvement Project*. July 7, 2016.
- Attachment 11: Trinidad Rancheria. 2016. *Provisional Landowner Access Agreement*. June 16, 2016.
- Attachment 12: U.S. Department of Agriculture, Natural Resource Conservation Service (NRCS). 2018. *Web Soil Survey and associated Map Unit Descriptions*.
<http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm> . Accessed May 22,2018.
- Attachment 13: BLM. 2017. *Map of Trinidad Head*. January 12, 2017. Accessed on July 25, 2018 at:
<https://www.blm.gov/documents/california/public-room/map/map-trinidad-head>
- Attachment 14: Federal Emergency Management Agency (FEMA). 2017. Portion of (FIRMETTE) *Flood Insurance Rate Map (FIRM) Community-Panel Number 06023C0495G*. Effective June 21, 2017. <https://msc.fema.gov/portal/home>
- Attachment 15: California Emergency Management Agency (CEMA). 2009. *Tsunami Inundation Map for Emergency Planning Arcata North Quadrangle*. Accessed online on May 22, 2018, at:
http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/humboldt/Documents/Tsunami_Inundation_TrinidadCrannell_Quads_Humboldt.pdf.
- Attachment 16: U.S. Fish & Wildlife Service (USFWS). 2018. *National Wetlands Inventory – Wetlands Mapper*. <https://www.fws.gov/wetlands/data/mapper.html>. Accessed May 22, 2018.
- Attachment 17: GHD. 2012. *City of Trinidad ASBS Stormwater Improvement Project Geotechnical Analysis*. October 2012.

USDA Rural Development NEPA Environmental Assessment

- Attachment 18: California Coastal Commission. 2018. *Determination from Mark Delaplaine Regarding Coastal Act Consistency*. May 25, 2018.
- Attachment 19: City of Trinidad. 2010. *Figure 7a of the Trinidad Draft General Plan*. February 2010.
- Attachment 20: SHN. 2018. *Biological Report, City of Trinidad ASBS Stormwater Improvement Project, Trinidad, California*. August 2018.
- Attachment 21: National Audubon Society. 2018. *Important Bird Areas*. Available at: <https://www.audubon.org/important-bird-areas>. Accessed on May 23, 2018.
- Attachment 22: William Rich and Associates. 2018. *An Archaeological Survey Report for Phase 2 of the Trinidad (ASBS) Stormwater Improvement Project, Trinidad, Humboldt County, California*. August 2018.
- Attachment 23: U.S. Environmental Protection Agency (EPA) Website. 2018. *Environmental Justice Screening and Mapping Tool (EJSCREEN) – City of Trinidad, CA*. www.epa.gov/ejscreen. Accessed June 15, 2018.
- Attachment 24: U. S. Census Bureau. 2010-2016. Selected Demographic, Housing and Economic Data tables from the 2010 Census and 2012-2016 American Community Survey. Available at: https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml. Accessed on June 15, 2018.
- Attachment 25: USDA Rural Development. 2018. Form RD-2006-38, Environmental Justice (EJ) and Civil Rights Impact Analysis (CRIA) Certification
- Attachment 26: CA Dept. of Toxic Substances Control. *EnviroStor Map and Database, Trinidad, CA*. Available at: https://www.envirostor.dtsc.ca.gov/public/map/?global_id=38330005. Accessed June 28, 2018.
- Attachment 27: CA State Water Resources Control Board. *GeoTracker Map and Database, Trinidad, CA*. Available at: <https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Trinidad%2C+ca>. Accessed June 28, 2018.

\\arcata\Projects\2018\018073A-Trin-SW-NEPA\GIS\PROJ_MXD\ USER: jsousa DATE: 7/12/18, 4:30PM

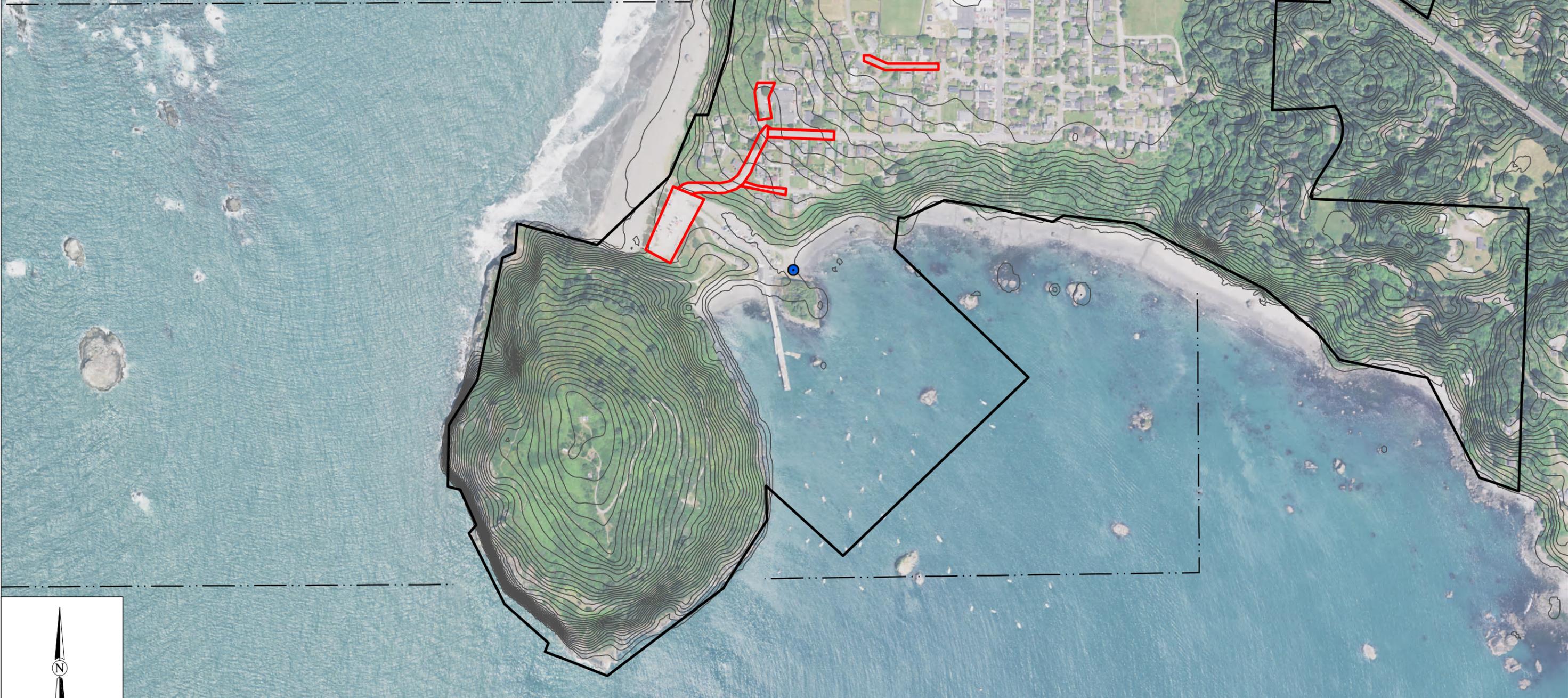


Copyright: © 2013 National Geographic Society, i-cubed

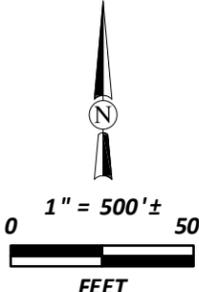
	City of Trinidad ASBS Storm Water Improvement Project: Phase 2 Trinidad, California	Project Location SHN 018073
	July 2018	SWP2_Fig1_ProjectLocation

EXPLANATION

-  PHASE 2 STORM WATER MANAGEMENT IMPROVEMENT PROJECT CONSTRUCTION APE
-  TRINIDAD CITY LIMITS
-  AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE (ASBS)
-  10' CONTOURS (NEXTMAP, 2005)
-  STORM WATER



\\Arcata\Projects\2018\018073A-Trin-SW-NEPA\GIS\PROJ_MXD\ USER:jsousa DATE:7/26/2018



1" = 500' ±
FEET

PHOTO SOURCE:
USGS NAIP, 2016

 Consulting Engineers & Geologists, Inc.	City of Trinidad ASBS Storm Water Improvement Project: Phase 2 Trinidad, California	Project Vicinity SHN 018073
	July 2018	SWP2_Fig2_ProjectVicinity

EXPLANATION

 PHASE 2 STORM WATER
MANAGEMENT IMPROVEMENT
PROJECT CONSTRUCTION APE



\\Arcata\Projects\2018\018073A-Trin-SW-NEPA\GIS\PROJ_MXD\ USER:jsousa DATE:7/27/2018

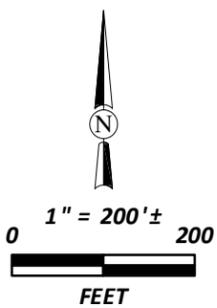


PHOTO SOURCE:
USGS NAIP, 2016

 Consulting Engineers & Geologists, Inc.	City of Trinidad ASBS Storm Water Improvement Project: Phase 2 Trinidad, California	Area of Potential Effect SHN 018073
	July 2018	SWP2_Fig3_AreaOfPotentialEffect

EXPLANATION

- PROJECT PARCELS
 - PHASE 2 STORM WATER MANAGEMENT IMPROVEMENT PROJECT CONSTRUCTION APE
- ZONING
- OS - OPEN
 - SE - SPECIAL
 - SR - SUBURBAN RESIDENTIAL
 - UR - URBAN RESIDENTIAL
 - PD - PLANNED
 - C - COMMERCIAL
 - VS - VISITOR SERVICES
 - PR - PUBLIC & RELIGIOUS

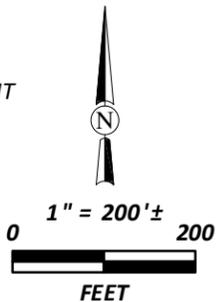
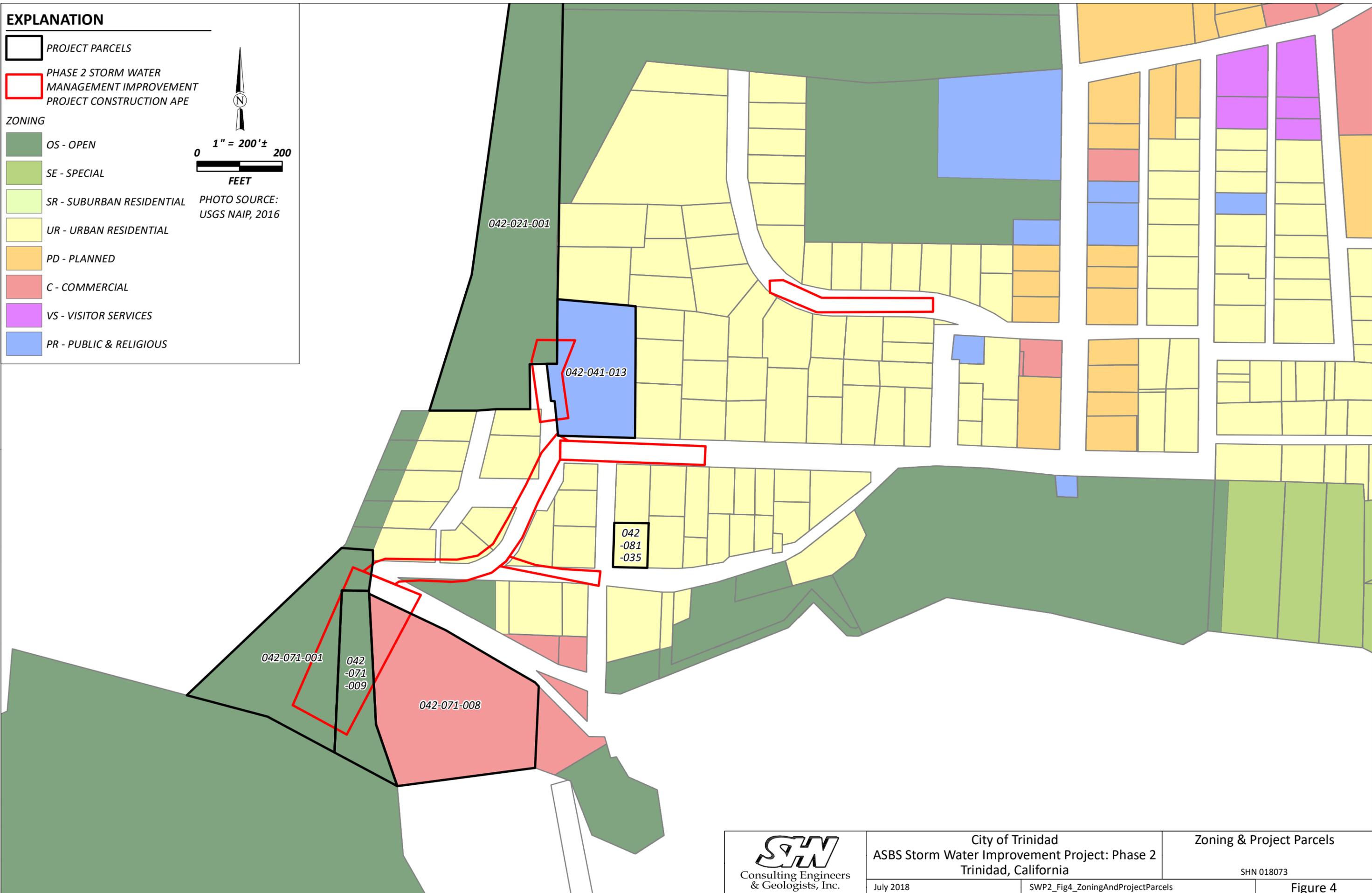


PHOTO SOURCE:
USGS NAIP, 2016



\\Arcata\Projects\2018\018073A-Trin-SW-NEPA\GIS\PROJ_MXD\ USER:jsousa DATE:7/13/2018