CITY OF TRINIDAD **Initial Study**
Planning Department **409 Trinity Street, Trinidad, CA 95570,** **(707) 677-0223**

INITIAL STUDY and CHECKLIST

PROJECT: **Trinidad ASBS Stormwater Improvement Project - Phase 2**

LEAD AGENCY: **City of Trinidad**
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PROJECT LOCATION: Ewing, Underwood, Van Wycke, Galindo and Edwards streets, and Harbor Area.

PROJECT PROPONENT / PROPERTY OWNER:
City of Trinidad
409 Trinity Street, P.O. Box 390
Trinidad, CA 95570
(707) 677-0223

ZONING/GENERAL PLAN DESIGNATION: The project will mostly occur within City right-of-way, including Edwards Street, Ewing Street, Underwood Drive, Van Wycke Street and Galindo Street, which have no zoning or general plan designation. A portion of the project will also occur within the Trinidad Harbor and beach parking area, which is zoned and designated Open Space and Commercial. Adjacent land uses are mostly Urban Residential (UR) to the north and Open Space to the south. The project site is within the Coastal Zone and subject to the City of Trinidad's Local Coastal Program (LCP).

PROJECT SUMMARY: The proposed project includes decommissioning the existing stormwater outfall and replacing 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 by the contributing sub-watersheds. In addition, the proposed project includes infrastructure to provide pollutant removal and capture of stormwater runoff. 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. Stormwater is then infiltrated into native soils after leaving the treatment unit. The project includes primary treatment systems located prior to each infiltration unit along or near Ewing Street, Underwood Drive, Edwards Street and the Trinidad Harbor parking area. The project also includes installation of a new stormwater drainage pipe that connects to the existing pipe at the intersection of Galindo and Van Wycke, along Van Wycke and then down Edwards to the Harbor infiltration system. The existing storm drain pipe between the intersection of Van Wycke and Galindo and the existing outfall will be abandoned in place.

SURROUNDING LAND USES AND SETTING: The City of Trinidad is a small community located on a coastal terrace above the Pacific Ocean. The project occurs mostly within City rights-of-way through residential areas. The improvements on Ewing Street are located near the Humboldt State University Marine Lab and Trinidad Beach State Park. The treatment system located within the Harbor parking area will be on or near land designed as Open Space and Commercial that is currently used for public parking and coastal access.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Mandatory Findings of Significance	☒ None

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a SUBSEQUENT NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potential significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed in an earlier EIR or NEGATIVE DEDCLARATION pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature Date

Printed Name For

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation has been provided for all answers including a "No Impact" answer. These are adequately supported by the information and sources cited within each topic section. A "No Impact" answer is adequately supported by the referenced information sources showing that the impact would not occur under the project. A "No Impact" answer has been further explained where it is based on project-specific factors as well as general standards.

2) All answers have taken into account the whole of the action involved, including off-site, on-site, direct, indirect, cumulative, construction and operational effects. This evidence is included in the discussion under each item.

3) Where the City of Trinidad has determined that a particular physical impact may occur, then the checklist answers indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. There are no "Potentially Significant Impacts" identified.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The explanation provided described the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5) Earlier environmental analyses/documents have been referenced and relied upon by the City, including those sources listed below. These documents are available for review at City Hall, located at 409 Trinity Street, Trinidad. Other citations utilized include cross-references to applicable local, state and federal standards.

PROJECT DESCRIPTION / SETTING:

1. LOCATION / SETTING:

The project is within Sections 23 and 26, Township 8 North, Range 1 West, Humboldt Meridian within the USGS 7.5' Trinidad topographic quadrangle map at approximately 30 feet above sea level to 190 feet above sea level (Figures 1 and 2). 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, and 367 people live within the City limits (2010 Census). The project is within the California Coastal Zone.

Access to the project area is via Highway 101 exit Main Street/Westhaven Drive South, then head west on Main Street into Trinidad. The project site is located within City of Trinidad rights-of-way and within the Trinidad Harbor area. Specifically, the project is located within the eastern portion of Underwood Drive, the western portion of Edwards Street, Ewing Street, lower Van Wycke and near the HSU Marine Lab (042-041-013), and within APNs 042-071-001, -008 and -009 (Harbor parking area) (Figure 3).

Adjacent land uses include almost exclusively residential and public open space. Trinidad Bay is part of the Trinidad Head Area of Special Biological Significance (ASBS), which is a designated State Water Quality Protection Area (SWQPA) (Figure 4). The California Ocean Plan prohibits discharges into ASBS, including stormwater outfalls. 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.

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 southern bluff was also the location of a Yurok Village called Tsurai. While the village site itself is located to the east of the project area, much of Trinidad holds cultural significance to the Yurok People, and therefore there is the potential for cultural resources within and adjacent to the project area. In addition, the bluffs have the potential for supporting Environmentally Sensitive Habitat Areas such as coastal scrub or coastal bramble.

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, with minimal infrastructure and services. Trinidad Harbor provides a key public access point for coastal and offshore recreation as well as commercial fishing opportunities.

2. DETAILED PROJECT DESCRIPTION:

Overview

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.

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, which mostly likely exceeds the capacity of the existing system. 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. Each treatment unit will have a manhole access cover for maintenance.

In total there will likely be four to six primary stormwater systems that compose the proposed project, each of which is a combination of the improvements noted above. The systems are located within the rights-of-ways of Ewing Street, Underwood Drive, Edwards Street, and in the Trinidad Harbor parking area (Attachment 1) and are presented in further detail below; in addition, a new storm drain pipe will be construction along lower Van Wycke Street. 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, options for a series of smaller treatment chambers lower down on Ewing and Edwards is being explored. Generally, the potential construction area (Area of Potential Effect) is covered in Figures 2 and 3. Pipe installation may occur through trenching (most likely) 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. In addition, the project may add approximately 200 ft. of curb at the northern end of Underwood as well as a new drainage inlet, treatment chamber and infiltration gallery. This is outside of the mapped APE, but would be beneficial to catch runoff from the school and would help minimize the size of the improvements needed on Ewing and in the Harbor parking area.

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. The concrete outfall structure on Launcher Beach may also be demolished and removed, depending on input from relevant regulatory agencies; the pipe itself will be abandoned in place.

Prior Environmental Review

An Environmental Assessment (EA) was prepared pursuant to the National Environmental Policy Act (NEPA) by USDA's Rural Development Services as part of an application for Water and Environmental Financing for a portion of the project. The EA was circulated for public and agency comment. A Finding of No Significant Impact (FONSI) was issued in December 2018 (Attachment 2). However, completion of NEPA requirements does not constitute compliance with CEQA, so this Initial Study is being prepared.

Need for the 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 3). 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 4) 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 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.

Project Objectives

The primary objective for this project is to decommission the existing stormwater outfall on launcher beach. Secondary objectives and 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;

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

Project Specifics

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 (e.g. GHD 2012). 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.

Anticipated construction includes mobilization/demobilization, potholing, temporary construction signage, 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, which 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 2020 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 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.

Final Design
Final designs for this project have not yet been completed. However, preliminary schematics have been assembled to show likely project elements and locations. This CEQA document will help inform the final designs to ensure the least amount of environmental impact possible. Therefore, some of the discussion in this document is general. The final specific designs will be subject to the City's Coastal Development Permit, and Grading Permit requirements. If the final specifications alter the significance of any of the identified environmental impacts, a new or supplemental CEQA document will be prepared and circulated as necessary.

Specific project components include the following as shown on Attachment 1:

- New storm drain inlets on Edwards street (2), Ewing Street (5), the western end of Edwards Street (18).
- New storm drain pipe along Underwood Drive, Ewing Street, lower Edwards Street and lower Van Wycke Street.
- Abandonment in place of the existing storm drain pipe on lower Galindo Street.
- New treatment chambers on Underwood Drive, Ewing Street, Edwards Street, and within the Harbor area Parking Lot.
- New infiltration pipe along Underwood Drive, Ewing Street, the west end of Edwards Street, and within the State Beach parking lot.

Project Permitting

Once the final designs for the project are completed, a Coastal Development Permit (CDP) and Grading Permit will be required to be processed and approved by the City of Trinidad. In addition, a CDP may need to be approved by the Coastal Commission for a portion of the project within the Harbor Area, where the Coastal Commission has not certified Trinidad's Local Coastal Program and therefore retains CDP jurisdiction (Area of Deferred Certification).

Project Alternatives

No Action
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 4) 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 at the time) 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.

Keep Existing Outfall

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). 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 aquip® system from StormwaterRx, which targets the 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.

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.

The potential area for the treatment system (Attachment 9) 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.

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.

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 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 (GHD, 2018). That is a significant expense for the City as small as Trinidad, equating to more than 10% of the City's annual general fund budget of approximately $650,000 per year; it is not considered sustainable.

Other Alternatives

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.

DISCUSSION OF CHECKLIST RESPONSES

1. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) Substantially degrade the existing visual character or quality of public view of the site and its surroundings? If the project is in an urbanized area, would the project conflict with the applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?				X

Setting: Trinidad is a highly scenic area in general. 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. Both the California Coastal Act and Trinidad ordinances protect coastal viewsheds.

Areas in the City designated Open Space include: a portion of the bluffs along the south and west sides of the City, Trinidad Head, Little Head, near-shore and off-shore rocks, beaches, Trinidad State Beach, and Trinidad School playing field. Areas north of the City include Trinidad State Beach at College Cove/Elks Head, Simpson Demonstration Forest. South of the City includes Baker Beach, and County Parks (Houda Point, Luffenholtz Creek Parks).

The project area is visible from several locations, including Trinidad Head and Scenic Drive to the south.

Analysis:

a) Finding: The project will not have a substantial adverse effect on a scenic vista. *Less than significant impact.*

Discussion: 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 in the immediate vicinity of the active area(s) 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, because the improvements are all below-ground or at-grade.

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, 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 is expected to be five to six months.

Vegetated and open spaces areas will not be impacted by the project, as all work will remain within paved roads and existing parking areas. No trees, rock outcroppings or other scenic elements will be removed.

b) Finding: The project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. *Less than significant impact.*

Discussion: According to the California Scenic Highway Mapping System, there are no designated State Scenic Highways in the project vicinity (www.dot.ca.gov). Highway 101 is listed as "Eligible State Scenic Highways" but the project site is not visible from this highway. Scenic Drive, Stagecoach Road and Edwards Street are all local roads that are eligible for designation as scenic routes; the project will be visible from portions of

Scenic Drive and Edwards Street, but only during construction as described above. The project site does not contain any scenic resources such as landmark trees, rock outcroppings, or historic buildings that would be impacted by the project. Disturbance of soil and vegetation will be minimized. Therefore, the proposed project will not substantially damage scenic resources within a state scenic highway.

c) Finding: The project will not substantially degrade the existing visual character or quality of public views of the site and its surroundings or conflict with applicable zoning and other regulations governing scenic quality. *Less than significant impact*.

Discussion: The proposed project would result in stormwater treatment and infiltration infrastructure at or below ground level, including inlets, pipes, curbs, gutters, and manholes. The new infrastructure will not significantly change the current aesthetics of the project area. Also see discussion under 'a' above.

d) Finding: The project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. *No impact*.

Discussion: The project does not propose any new lighting. Therefore, the proposed project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Mitigation Measure(s):
None proposed.

2. AGRICULTURE & FORESTRY RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

Setting:

There are no lands in Trinidad that are zoned or designated for agricultural or forestry use (Figure 4). There are no lands that are suitable for agriculture and forestry uses in the City. 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. 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.

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 be appropriate. 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.

The project is primarily located within existing, developed, City of Trinidad rights-of-way, including Underwood Drive, Edwards Street, Ewing Street, and Van Wycke Street. Public rights-of-way do not have zoning or land use designations associated with them. The project will take place in an urbanized area not used or suitable for agriculture or forestry.

Analysis:

a) Finding: The project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. *No impact*.

Discussion: Though California's Farmland Mapping and Monitoring Program has not mapped Humboldt County, agriculture is still very important in the region. However,

Trinidad does not contain agriculturally zoned land or known agricultural uses. Soils in the project area are often either very sandy with high percolation rates or have impermeable clay layers. In addition, the salty ocean air and prevalence of offshore wind limit agricultural potential even on good soils.

According to the NRCS Web Soil Survey (NRCS, 2018), there is one mapping unit (146) that qualifies as prime farmland if irrigated (Attachment 10). 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.

b) Finding: The project will not conflict with existing zoning for agricultural use, or a Williamson Act contract. *No impact*.

Discussion: As described in the setting, there is no agriculturally zoned land in the City of Trinidad. The project sites are generally within public rights-of-way, and the surrounding areas are primarily zoned Urban Residential. There are no parcels in the project area under Williamson Act contract.

c) Finding: The project will not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526). *No impact.*

Discussion: As described in the setting, there is no land zoned for forestry or timber within the City. There is land zoned TPZ within the City's Planning Area, but none near the project sites; the commercial timberland is located east of Hwy 101 and the rural residential areas nearer to the coast.

d) Finding: The project will not result in the loss of forestland or conversion of forest land to non-forest use. *No impact*.

Discussion: The project site does not contain forestland and is not zoned for timber production. The project will take place within an urbanized area. Therefore, the proposed project will not result in the loss of forestland or conversion of forest land to non-forest use.

e) Finding: The project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. *No impact*.

Discussion: The project will take place on and near coastal bluffs that are not suitable for agriculture or timber production. The project is not near any agricultural or timber land. Therefore, the project will not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Mitigation Measure(s):
None proposed.

3. AIR QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		X		
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?			X	

Setting:

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 has been designated "nonattainment" (Humboldt and Mendocino Counties) for 24-hour and annual particulate matter less than ten microns in size (PM-10) (CARB 2018). Both natural and anthropogenic sources of particulate matter in the NCAB have led to the PM-10 nonattainment designation.

All of Humboldt County has been designated by the California State Air Quality Board as being in "nonattainment" for PM-10 air emissions. PM-10 air emissions include chemical emissions and other inhalable particulate matter with an aerodynamic

diameter of less than 10 microns. 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 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 site has no history of contamination and is not adjacent to 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.

Analysis:

a) Finding: The project will not conflict with or obstruct implementation of the applicable air quality plan. *Less than significant impact*.

Discussion: Air quality in the City of Trinidad is regulated by the North Coast Unified Air Quality Management District (NCUAQMD). As required by the California Clean Air Act, the NCUAQMD adopted an Attainment Plan in 1995 to identify major PM-10 sources and develop and implement control measures to meet state ambient air quality standards. The NCUAQMD's attainment plan established goals to reduce PM-10 emissions and eliminate the number of days in which standards are exceeded.

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 proposed project will generate a minor amount of particulate emissions during construction in the form of dust and vehicle emissions as a result of ground disturbing activities, including mechanical clearing, grading, base laying and surface application, in addition to exhaust emissions from on-road haul trucks, worker commute vehicles, and construction equipment. The area of greatest activity and disturbance will be along existing public rights-of-way.

Prior to construction, the project is required to obtain a Coastal Development Permit and Grading Permit from the City. Section 15.16.080 allows the City to put conditions on permit approvals in order to control dust and other nuisance impacts. Mitigation Measure 4 (*Erosion Control*) in Section 6 includes construction BMPs that will reduce the potential for nuisance dust emissions. 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 environmental protection actions consistent with the NCUAQMD Particulate Matter Attainment Plan that would substantially reduce dust and other air pollutants during the construction period, will be incorporated into the project as needed to comply with City and NCUAQMD requirements.

The project would be consistent with applicable City policies and regulations related to air resources. Therefore the project will not obstruct implementation of the NCUAQMD Attainment Plan for PM-10, and a less than significant impact would occur.

b) Finding: The project will not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard. *Less than significant impact*.

Discussion: As described above, the NCAB is in non-attainment for the criteria air pollutant PM10; however, as discussed above, project construction would cause only minor and short-term production of PM10 and would not significantly increase the background levels. Project operation would result in negligible additional PM10 emissions. Therefore, the project would result in a less than a cumulatively considerable impact to air quality from criteria air pollutant and precursor emissions.

c) Finding: The project will not expose sensitive receptors to substantial pollutant concentrations. *Less than significant impact*.

Discussion: Sensitive receptors in the project area include residences, churches, Trinidad Elementary School, and vista points. Construction of the project would create temporary emissions of toxic air contaminants, primarily as a component of diesel emissions from construction equipment. Due to the variable nature of construction activity, the generation of toxic air contaminant emissions would be temporary, particularly considering the short amount of time such equipment is typically within an influential distance of sensitive receptors. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (BAAQMD 2017). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities associated with this project.

Construction is anticipated to occur over approximately six months (May to October) between the hours of 7:00 AM and 6:00 PM, Monday through Friday. Section 15.16.210 of the City's grading ordinance specifies that all grading within 1,000 feet of any residential occupancy shall occur between the hours of 8:00 a.m. and 5:30 p.m., unless

other hours are specified by the City Engineer. In this case, the City Engineer has suggested a longer window of time in order to avoid the need for construction on weekends, to keep the construction window to less than six months and to keep costs down. As discussed above, the project would result in only minor, short-term construction-related air emissions. As these emissions are temporary in nature, health risks from project construction are not anticipated. Construction impacts are less than significant.

Project operation would not expose sensitive receptors to substantial pollutant concentrations as the project does not include any stationary source emissions. Therefore, no operational impacts would occur.

d) Finding: The project will not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. *Less than significant impact*.

Discussion: During construction, the various diesel-powered vehicles and equipment could create localized odors. Additionally, some materials used in construction or substrates encountered in sub-surface construction may create objectionable localized odors. These odors would be temporary and not likely to be noticeable for extended periods of time beyond the construction zone due to atmospheric dissipation. The impact would be less than significant.

Project operation would not expose a substantial number of people to objectionable odors as the project components are passive and would not include anything which would cause long-term objectionable odors. Therefore, no impact would occur.

Mitigation Measures:
See Mitigation Measure 4 in Checklist Section 6 – Geology and Soils.

4. BIOLOGICAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X

Setting:

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.

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 study area is characterized by non-native vegetation typical of disturbed sites. This included sweet vernal grass (*Anthoxanthum odoratum*), hairy cat's-ear (*Hypochaeris radicata*), bird's foot trefoil (*Lotus corniculatus*), English ivy (*Hedera helix*), and English plantain (*Plantago lanceolata*), among others. Two vegetation communities were observed adjacent to the study area. Coyote brush scrub (*Baccharis pilularis* Shrubland Alliance) exists to the west of Ewing Street, and coastal brambles (*Rubusparviflorus, spectabilis, ursinus*) Shrubland Alliance exists to the north of the harbor parking area. Both of these vegetation communities are outside of the study area and are unlikely to be impacted by the project. A detailed description of the biological information and findings that were prepared for this project are included in the Biological Report prepared for this project (SHN 2018).

The project area potentially contains habitat for various wildlife species typically associated with urban landscapes, shrubby habitat, and marine shorelines of northwestern California. The California Natural Diversity Database (CNDDB) and the California Native Plant Society (CNPS) Online Inventory were queried on April 4, 2018 for any species recorded within the Trinidad USGS quadrangle and eight adjacent quadrangles. Twenty-one special status species were determined to have a moderate or high potential of occurrence within the immediate vicinity of the project area. Due to the proximity of project activities along existing public rights-of-way with no vegetation removal proposed, the project is not likely to adversely affect these special status species or their habitats.

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.

Analysis:

a) Finding: The project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. *Less than significant impact with mitigation*.

Discussion: The project site is located mostly within developed portions of public rights-of-way. Other components will be located within the Trinidad Harbor and beach gravel parking area. The habitat types surrounding the project area are suitable for supporting foraging birds and other wildlife used to human disturbance, though not ideal for nesting. Surveys were conducted on April 4, 2018 by a qualified biologist/botanist from SHN to look for CDFW and USFWS special status plants and animals; the survey did not detect any sensitive species within the project area. The

project will have no effect on special status plant species or their habitat due to the lack of habitat within the project area and the developed nature of the project area.

Special status birds are not likely to be affected by the proposed project. Riparian and wooded areas will not be impacted by the project, as all work will remain within paved roads and existing parking areas for staging. No trees will be removed, and no significant vegetation clearing is proposed. There may be some noise-related disturbance associated with the construction of the project, but it will not have a significant impact on special status birds due to the proximity of the proposed project within the existing right of way of a well-traveled roadway. Nesting bird surveys will be required prior to construction should work begin during the nesting season, which is likely. For protection of birds under the Migratory Bird Treaty Act, Mitigation Measure 1 requires this temporary disturbance to be conducted during the non-nesting season (August 16-January 31), unless a nesting bird survey is conducted prior to vegetation removal if done during the nesting season (February 1 – August 15).

Therefore, the project will not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species.

b) Finding: The project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. *Less than significant impact*.

Discussion: The project site does not contain any waterways, riparian vegetation, or wetland areas. The riparian habitats to the north and to the east, and the estuarine and marine wetlands situated along the coastal shores will not be directly impacted by the project with the implementation of standard BMPs to prevent erosion and storm water runoff during construction (see Mitigation Measure 4) and will be better protected after project completion including the proposed LID features that would provide capture, treatment, and infiltration for stormwater runoff.

Minimal vegetation removal immediately adjacent to the existing rights-of-way footprint will be necessary to achieve project goals. Re-seeding with suitable native vegetation along the rights-of-way, will reestablish the habitat of the project area (Mitigation Measure 1).

Therefore, the project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community.

c) Finding: The project will not have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means. *No impact*.

Discussion: The project is located within existing rights-of-way in the City of Trinidad. There may be seeps within this area where groundwater exits after hitting the impervious bedrock layer of Franciscan mélange. Trinidad's sandy soils do not typically support wetlands, and the National Wetlands Inventory (NWI) does not report any wetlands within the project area. Although formal wetland delineation was not conducted for this project, no potential wetland areas were identified during biological field surveys. Therefore, the project will not have a substantial adverse effect on federally protected wetlands.

d) Finding: The project will not interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. *Less than significant impact*.

Discussion: The project is located within developed rights-of-way. The project site and surrounding area are already substantially developed and disturbed with no significant native habitat. Species currently using the area would already be accustomed to human disturbance. Construction fencing may be used during project activities but is not expected to restrict wildlife movement past the project area. After project completion, wildlife could easily cross the roads or use the roads themselves for a movement corridor, although most wildlife movement is expected to occur along riparian corridors. The project will occur more than 100 feet from the edge of any riparian vegetation. There are no impacts to streams or marine habitat. Therefore, the proposed project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

e) Finding: The project will not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. *Less than significant impact*.

Discussion: As described in the setting and discussions above, the project site does not contain any significant biological resources including waterways, riparian vegetation, wetlands, or tree cover. The Trinidad General Plan biological resource protection policies (15-18) are fairly limited, focusing on riparian and rare plant habitats, neither of which exist within the project area. As described above in 'a', the project area was surveyed during seasonally appropriate times for detecting special status biological resources and none were observed, nor their habitat. Therefore, the proposed project will not conflict with any local policies or ordinances protecting biological resources.

f) Finding: The project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. *No impact.*

Discussion: There are no applicable Habitat Conservation Plans or Natural Community Conservation Plans applicable to the project site or in the project vicinity. Therefore, the proposed project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Plan, or other approved plan applicable to the project area.

Mitigation Measures:

Mitigation Measure 1 – Biological Resource Protection Measures.

1. Construction activities conducted during the nesting season (February 1 – August shall require a nesting bird survey to be conducted prior to any vegetation removal.
2. Disturbed areas outside the paved roadway or grassy swales will be re-seeded with native, locally sourced vegetation that is compatible with the local coastal environment.

5. CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?		X		
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

Archaeological and other heritage resources can be damaged or destroyed through uncontrolled public disclosure. Archaeological site locations and culturally sensitive information is considered confidential and public access to such information is restricted by state and federal law, therefore, this information has been redacted for use in the Mitigated Negative Declaration (MND). Professionally qualified individuals, as determined by the California Office of Historic Preservation, may contact the lead agency directly in order to inquire about its availability.

Information regarding the location, character or ownership of a historic resource is exempt from the Freedom of Information Act pursuant to 16 U.S.C. 470w-3; Section 304 of the National Historic Preservation Act, 36 CFR 800(6)(a)(5) and 36 CFR 800.11(c); Section 9(a) of the Archaeological Resources Protection Act; Executive Order 13007; Section 6254.10 and GC 6254(r) of the California State Government Code and the California Public Records Act (CPRA); and the 2005 California Senate Bill 922.

Setting:

The City of Trinidad lies within the traditional territory of the Yurok people who lived within the Trinidad area and the ancestral village of Tsurai. The proposed project area along the Edwards and Van Wycke Streets lies close to the known Yurok village site of Tsurai. The surrounding areas, including all of the Trinidad townsite and Trinidad 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 Yurok Tribe considers Tsurai Village and Trinidad Head to be sacred sites, as well as, areas of archaeological and cultural significance. There are currently recorded archeological sites within the Trinidad area. Qualified professionals can refer to the 2018 Archaeological Survey Report (WRA 2018) for further details regarding archaeological sites. A redacted copy is also available for review by the public.

Although no specific Native American or historic period archaeological sites are known directly in the project area, it is anticipated that such deposits exist. Historic research indicated that the project area has a high potential for Native American archaeological sites. Pre-contact era archaeological site indicators would predominantly include stone tools or chert and obsidian, stone tool debitage, ground stone implements, milling stone features, locally darkened midden soils, possibly shell and/or bone debris, pit features and rock alignments. Site types associated with Native American religious activity could include cupule boulders, rock rings and prominent outcrops, as well as human remains.

The project area 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. Historic period cultural resources associated with Gold Rush-era Trinidad could be located in the project vicinity. Expected historic period cultural resource indicators include ceramic, glass or metal artifacts; structures; trails; tailings and pits.

Analysis:

a) Finding: The project will not cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5. *Less than significant with mitigation.*

Discussion: The project site is located within the City limits of the City of Trinidad. 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.

Archaeological Survey of the project area was completed by William Rich & Associates (WRA) in August 2018. Background research for this investigation included a records search at the Northwest Information Center (NWIC) and a background literature review. The literature review for this project included an examination of historical maps, records and published documents at the Humboldt County Historical Society, Humboldt State University Library, and the Humboldt County Library.

The investigation analyzed the impacts of the project, and on Page iii, Mr. Rich stated: "*Because the proposed project will not alter built environment 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 this investigation*." Because the project will not affect the area in which the structures are located, there will be no impacts on historic period buildings and structures.

Further, WRA Archaeological Survey Report contains the following conclusion on Page 22, "*the finding of this investigation, 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.*"

However, the WRA Report also noted that: "*The project is also near the 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.*" Therefore, the recommendations from the WRA Archaeological Survey Report have been incorporated as Mitigation Measure 2 for the project (see below). With the proposed mitigation measure, the project will not cause a substantial adverse change in the significance of an historic resource.

b) Finding: The project will not cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5. *Less than significant with mitigation*.

Discussion: The City of Trinidad lies within the traditional territory of the Yurok people who lived within the Trinidad area and the ancestral village of Tsurai. There are recorded archeological sites within the Trinidad area. Qualified professionals can refer

to the 2018 Archaeological Survey Report by WRA for further details regarding archaeological sites; a redacted copy is also available for public review.

Background research for this investigation included a records search at the Northwest Information Center (NWIC) and a background literature review. The literature review for this project included an examination of historical maps, records and published documents at the Humboldt County Historical Society, Humboldt State University Library, and the Humboldt County Library. The records search at the NWIC indicated that there are no records of cultural resources directly within project area, though some have been recorded nearby.

Multiple cultural resources have been recorded as a result of the archaeological studies in the Trinidad area; however none are located directly within the project area. The entire project area is, however, within a general location of cultural significance associated with the larger use areas of Tsurai Village. The WRA report (page 22) states that *"no previously recorded cultural resources have been specifically documented within the project area, however, because of the sensitivity of the entire Trinidad area there is a risk of encountering Native American and/or Euroamerican historic resources."*

Consultation with the local Tribal Historic Preservation Officers (THPOs) from the Trinidad Rancheria and the Yurok Tribe, and with a representative of the Tsurai Ancestral Society occurred as part of the WRA investigation. Correspondence is presented in the Archaeological Survey Report, consisting of emails, phone calls and in-person site visits. In addition, the City staff participated in a conference call On December 8, 2018 with USDA staff, members of the TAS and the project archaeologist. As part of this call, the City agreed to use cultural monitors during ground disturbing activities and to have an Inadvertent Discover Plan in place prior to construction. The TAS will provided an opportunity to review and comment on the monitoring/NAGPRA plan and the Inadvertent Discover Plan and will consult with the TAS on the alignment of the new stormwater pipe along lower Van Wycke Street. The USDA will also be enforcing these provisions as part of its obligations under Section 106 of the National Historic Preservation Act.

In addition, a pedestrian reconnaissance survey of the project area was conducted. It was found that the project area has been subject to previous construction of road, stormwater drainage systems, underground electric lines and other utilities as well as development of adjacent private lands. Project area soils showed signs of disturbance. All exposures of mineral soils were closely examined. Special attention was given to cut-banks, rodent tailings, and other areas where archaeological materials could be encountered. The field survey was surface only, no excavation occurred. No archaeological sites, features, or artifacts were observed within the project area during the surface survey.

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.

Although no resources were found during the archaeological survey, there is a possibility that historic resources, including buried archaeological materials, do exist in the area and may be uncovered during proposed projects activities. In addition to cultural monitoring, it was recommended that an inadvertent discovery protocol be put in place prior to project construction in the event cultural remains are encountered during project implementation. As such, the WRA Archaeological Survey Report (Page 22) states that, "*the following recommendations have been designed in accordance with the expressed concerns of the Trinidad area tribes:*

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 by 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.*

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 effect filed with the Northwest Information Center.*

The following example was provided on Pages 22-23 of the WRA Archaeological Survey Report.

> ***Yurok Tribe Policy and Procedures for Inadvertent Discovery of Yurok Cultural Items***
>
> *Traditional Yurok Law requires reburial of cultural items, and known funerary items as soon as possible. The Yurok Tribal Government shall make every attempt to immediately rebury these items upon notifications. In stances where it is believed that a violation of tribal law, federal/state law have been committed, the tribal government or another law enforcement agency shall investigate and determine if prosecution is warranted, and seek retribution for the crime(s) committed against Yurok ancestors and sacred sites.*
>
> *Procedures for notifying the Yurok of an inadvertent discovery of human remains, associated and/or unassociated funerary items, and cultural items.*
>
> ***Step 1.*** *Upon discovery of human remains, associated and/or unassociated funerary items the individual or representative of an organization, governmental agency shall immediately stop ground-disturbing activities in the immediate area of the discovery.*
>
> ***Step 2.*** *Must establish a reasonable protective barrier (marked by flagging tape) around the cultural site, within which, ground-disturbing activities are temporarily suspended. You shall also take steps to protect the discovered item(s) in a respectful and dignified manner. Removal of the unearthed item is not recommended unless it is directly threatened by a destructive force (i.e. heavy equipment).*
>
> ***Step 3.*** *Immediately report the discovery to the Yurok Tribal Heritage Preservation Officer (THPO), Trinidad Rancheria TPO and the Tsurai Ancestral Society. You must also follow all applicable state and federal laws in the event that human remains are discovered (i.e. County Corner).*

This protocol was provided to WRA by the Yurok Tribe in 2017, however the Trinidad Rancheria and Tsurai Ancestral Society may also want to provide input on the above procedures. It is also recommended that the City of Trinidad continue consultation and seek approval of this inadvertent discovery plan before final permit approval. In addition, Health and Safety Code §7050.5 and Public Resources Code § 5097.98 outline a specific process for the inadvertent finds of human remains. Notification of the tribe determined (by the coroner) to be the MLD for the project will be done by the NAHC. Therefore, the NAHC has been included in the consultation process for developing a final inadvertent discovery protocol related to human remains for this project.

The recommendation from the WRA Archaeological Survey Report has been included as Mitigation Measure 2 for the project (see below). With the proposed mitigation

measures, the project will not cause a substantial adverse change in the significance of an archaeological resource.

c) Finding: The project will not disturb any human remains, including those interred outside of formal cemeteries. *Less than significant with mitigation*.

Discussion: There are no known human remains on the site (see discussion under finding 'b' above). However, due to the potential of discovering unknown human remains during the proposed construction activities, Mitigation Measure 2 has been included to address the process for handling the inadvertent discovery of human remains. Therefore, the proposed project will not disturb any human remains.

Mitigation Measure:

Mitigation Measure 2 – Cultural Resource Protection Measures

1. A Monitoring Plan / NAGPRA Plan of Action shall be put in place prior to permit approval, thereby setting up a formal agreement between stakeholders regarding the plan for items discovered and excavated dirt removed during project construction. The plan will be developed with input from the NAHC, Yurok Tribe, Trinidad Rancheria, and the Tsurai Ancestral Society.
2. Any grading or earthwork activities within the project area shall be monitored by tribally appointed monitor(s).
3. Cultural resource monitors shall 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 will be delayed until an archaeologist, qualified to the Secretary of Interior Standards, has assessed the significance of the find.
4. The cultural resource monitor(s) shall be kept informed by the contractor of the ground disturbance schedule. Field notes shall be kept by the monitor(s) and a brief letter report of the monitoring effort filed with the Northwest Information Center.

6. ENERGY: Would the project:	Potentially Significant Impact	Less-Than-Significant Impact with Mitigation Incorporated	Less-Than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Setting:

Energy consumption and production are closely linked to the physical development of land. The majority of the energy consumed in Humboldt County is imported, with the exception of biomass energy and a small amount of natural gas, as per the findings of the Background Technical Report for the Humboldt County General Plan 2025 Energy Element dated October 2005. There are also several potential local renewable energy resources that are as yet mostly untapped, including wind, wave, biomass, solar and micro-hydroelectric. Conservation and increased efficiency are also ways in which to essentially boost energy capacity by reducing demand.

In 2003, the Redwood Coast Energy Authority (RCEA) was formed as a joint powers authority (JPA), representing seven municipalities, including Trinidad, and Humboldt County. A JPA is an entity where two or more public authorities work together to exercise a power common to them. As the regional energy authority, RCEA implements prioritized energy sustainability strategies on a regional basis through a Comprehensive Action Plan for Energy. This action plan is maintained by the RCEA Board. The City will also implement energy sustainability strategies through policies, implementation measures, and standards contained in this Plan.

The October 2018 Draft Circulation Element of the Trinidad General Plan includes an Energy section that promotes self-sufficiency, independence, and local control in energy management and supports diversity and creativity in energy resource development, conservation, and efficiency. This strategy can reduce the drain on the county's economy for energy, stimulate local businesses and the economy, and help the City meet greenhouse gas emission reduction targets.

Analysis:

a) Finding: The project will not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. *Less than significant impact*.

The project will use energy during short-term construction activities (e.g. construction equipment) and long-term operation of the project (e.g., maintenance). Vehicle traffic associated with the project will also involve energy usage. The project will generate some vehicle traffic during construction, and will generate minimal vehicle traffic following construction (for maintenance activities).

The proposed construction activities will be short-term, occurring over a period of 5 to 6 months over small areas. No extraordinary construction techniques or equipment will be used. The short duration and limited scope of construction will limit the potential for wasteful, inefficient, or unnecessary consumption of energy resources during construction.

Following the completion of construction, long-term operation and maintenance of the improved stormwater infrastructure will not generate a substantial increase in vehicle trips compared to baseline conditions. The new infiltration basins require regular annual maintenance, and periodic repairs similar to the existing stormwater system. However, the infiltration basins do require the use of vacuum truck to clean them annually. This increased maintenance will be partially offset by the elimination of the need to maintain the outfall and collect water samples.

Therefore, the proposed project will not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Finding: The project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. *Less than significant impact*.

California's primary energy efficiency standards are found in State's Building Standards Code, Title 24 of the CA Code of Regulations. All of those requirements will be met as they pertain to the project. The City's draft energy policies include the following:

> *CIRC-5.1* Encourage energy efficiency, use reduction and conservation in new and existing development and set an example by improving the City's own energy efficiency and conservation wherever feasible.
>
> *CIRC-5.2* Encourage small-scale, onsite renewable energy such as wind, solar, and micro-hydro in new and existing development, when it is consistent with environmental and scenic considerations, and set an example by utilizing renewable energy in City facilities where feasible.
>
> *CIRC-5.3* Use renewable energy to reduce greenhouse gas emissions.

The project does not conflict with any of the above policies and will not impact efforts to improve energy efficiency. Therefore, the project will not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

7. GEOLOGY AND SOILS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?		X		
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

Setting:

The project area is underlain by the Franciscan Complex, Cretaceous to Jurassic in age. This formation is comprised of sediments deposited onto the ocean floor, and then highly deformed when scraped onto the North America Plate as the ocean plate (Gorda Plate) is subducted underneath. Trinidad proper is comprised of resistant headlands and seastacks, mixed with more easily erodible Franciscan melange (formed by turbidity currents that deposited sand, mud, gravel, and silica (derived from marine shells).

Overlying the Franciscan Complex is a series of Pleistocene marine terraces ranging from approximately 40,000 to 83,000 years old, described as thin to massive intervals of fine to coarse beach sands ranging from 15 to 70 feet deep, with occasional lenses of marine and fluvial gravel (GHD, 2012). The terraces are gently sloping surfaces, and were formed at sea level by wave erosion and deposition. They are now raised above sea level due to periodic sea-level changes and uplifting of the coastline. The terrace surfaces range in elevation from about 140 feet at the western edge of town, to 600 feet at the eastern edge. Most of the ground surface in Trinidad has a slope of 15% or less, but steeper slopes are found at sea cliffs, stream banks, and the boundaries between marine terraces (Streamline Planning Consultants 2007).

The coastal bluffs, near the project area have an erosion potential due to wave erosion, particularly at high tide and winter storms. Rates of cliff retreat vary along the coastline depending on local bedrock characteristics and degree of protection from waves. The City's consulting City Engineering firm, GHD, performed a geotechnical evaluation report for the ASBS Stormwater Improvement Project (GHD, 2012). This report characterizes the hydrologic features, the marine terrace aquifer and Franciscan bedrock, and the water flow through the marine terrace aquifer in the Trinidad study area.

Two faults exist within Trinidad; the Anderson Ranch (also called the Trinidad Fault) and the Trinidad Head Fault. The Anderson Ranch fault is located at the eastern boundary. Evidence of the Anderson Ranch Fault can be observed as a rise in land north of the Chevron Station (at the intersection of Scenic Drive and Main Street). The Trinidad Head Fault is mapped in the low elevation notch between Trinidad Head and the slope that rises toward Trinidad from the beach (GHD, 2012). Both faults are part of the Mad River fault zone. The California Department of Mines and Geology identified the Anderson Ranch fault as part of the Alquist-Priolo Earthquake Fault Zone. The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. This act prohibits the siting of structures designed for human occupancy across active faults and regulates construction within fault zones.

The USDA NRCS Web Soil Survey shows two soil types mapped beneath the project area: Halfbluff-Tepona-Urban Land 2 to 9 percent slope (map unit 146) and Candymountain 30 to 75 percent slopes (map unit 299). These soils are described as fine sandy loams, derived from sedimentary marine deposits.

Analysis:

a.i) Finding: The project will not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Divisions of Mines and Geology Special Publication 42. *No impact.*

Discussion: The Alquist-Priolo Earthquake Fault Zoning Act was passed in 1972 to mitigate the hazard of surface faulting to structures for human occupancy. This act prohibits the siting of structures designed for human occupancy across active faults and regulates construction within fault zones. Phase 2 of the ASBS stormwater improvement project is not located within or near an Alquist-Priolo Fault Hazard Zone. At its closest point (Underwood Drive), the project is located approximately 1,200 feet from the nearest Alquist-Priolo Fault Hazard Zone. This is the identified Anderson Ranch fault also known as the Trinidad Fault. In addition, the project does not include any human-occupied structures. Therefore, the project will not expose people or structures to substantial adverse effects from a fault rupture.

a.ii) Finding: The project will not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking. *Less than significant impact.*

Discussion: The project area is located within the northern Coast Ranges Geologic Province which is a seismically active area in which large earthquakes may be expected to occur during the economic lifespan (50 years) of any development within the project area. The extent of ground-shaking during an earthquake is controlled by the earthquake magnitude and intensity, distance to the epicenter, and the geologic conditions in the area. The project does not involve the construction of structures which would be occupied by people, nor is it designed to attract significant numbers of new users that would be at risk. Structures will be designed and built to current standards under the recommendations of appropriately licensed professional(s). Therefore, the project will not expose people or structures to substantial adverse effects including the risk of loss, injury, or death involving strong seismic ground shaking.

a.iii) Finding: The project will not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction. *No impact.*

Discussion: Liquefaction is the transformation of saturated, loose, fine-grained sediment to a fluid-like state because of earthquake shaking or other rapid loading. Liquefaction is known to occur in loose or moderately saturated granular soils with poor drainage. The proposed project would not include residential development, occupied structures, or critical facilities that would be subject to liquefaction. Liquefaction caused by seismic shaking has a low probability of occurrence in Trinidad. According to the Humboldt County WebGIS and other mapping (e.g. CDMG), there is no potential for liquefaction to occur in the Trinidad area. Therefore, the project will not expose people or structures to substantial adverse effects involving seismic-related ground failure, including liquefaction.

a.iv) Finding: The project will not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. *Less than significant impact.*

Discussion: Steep slopes and unstable geologic material create erosion and landslide hazards in some of the Trinidad area. Coastal bluffs are especially subject to these hazards because of continuous wave erosion. Several types of slope failure have the potential to occur in the Trinidad area. Earthflows and debris flows are the most common, and tend to happen on the clay-rich material of the Franciscan matrix. This type of landslide poses a danger to structures because it often involves the movement of large blocks of material, such as the ones that come to rest on Trinidad State Beach. Active flows are generally characterized by a "head" scarp at the upslope end and either a lumpy "toe" of debris or a cohesive block of material at the downslope end, so they can be recognized in the field.

Currently there are no active landslides that may constrain development near the project sites (Streamline Planning Consultants, 2007). Groundwater modeling results from GHD (2012) were reviewed by Engineers at Crawford & Associates, Inc. (2013) and HydroGeoLogic Inc. (2013) to verify that the locations and quantities of stormwater infiltration will not compromise bluff stability. The project was designed to avoid areas that could create instability with oversaturation. Their findings conclude that the project would not expose people or structures to substantial risk of landslides. Crawford & Associates completed a slope stability analyses along selected cross sections through the study area (C&A, 2013). Their findings show that the reduced factor of safety to be acceptable during a 50-year storm event.

b) Finding: The project will not result in substantial soil erosion or the loss of topsoil. *Less than significant impact with mitigation.*

Discussion: Construction activities, including cut, fill, removal of vegetation, and operation of heavy equipment would disturb soil and, therefore, have the potential to cause erosion. An erosion control plan (Mitigation Measure 3) would be prepared for the project prior to the start of construction and soil disturbance. The erosion control plan would include BMPs designed to reduce erosion of exposed soil and minimize the sediment entrained in runoff from the site during construction. BMPs may include: silt fences, straw bales and wattles, soil stabilization controls, site watering for controlling dust, and sediment detention basins.

The proposed project will require City approval of a Grading Permit and an erosion and sediment control plan and grading, drainage and erosion control specifications will be per City standards consistent with Chapter 15.16 (Grading) of the Trinidad Municipal Code. In addition, most or all of the construction will occur during the dry season. Therefore, the proposed project will not result in substantial soil erosion or the loss of topsoil.

c) Finding: The project will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. *Less than significant impact.*

Discussion: The City's consulting City Engineering firm, GHD, performed a geotechnical evaluation report for the ASBS Stormwater Improvement Project (GHD, 2012). This report characterizes the hydrologic features, the marine terrace aquifer and Franciscan bedrock, and the water flow through the marine terrace aquifer in the Trinidad study area. Crawford & Associates used this report to complete a slope stability analyses along selected cross sections through the study area (C&A, 2013). Their findings show that the reduced factor of safety (FS) to be acceptable during a 50-year storm event.

As part of the City's grading permit process, the City Engineer has to make the finding that the proposed grading will not adversely affect the drainage or lateral support of other properties in the area, and will not be detrimental to the public health, safety or the general welfare, and is not in conflict with the provisions of the grading ordinance, zoning ordinance, and the general plan (TMC §15.16.070.A). Therefore, the project will not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

d) Finding: The project will not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. *No impact.*

Discussion: Expansive soils are generally high in certain clay types and are prone to large volume changes that are directly related to changes in water content. Trinidad is not in an area known to have expansive soils. According to a comprehensive, City-wide geotechnical report prepared for a number of planned stormwater infiltration projects (GHD, 2012), the marine terrace formation underlying the majority of the project area is dominated by fine to medium-grained beach sand, up to 70 feet thick, with local discontinuous thin layers of silt and gravel generally less than two feet thick. These substrate types are unlikely to be classified as expansive because they are generally well drained and do not include a substantial clay component.

e) Finding: The project will not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water. *Less than significant impact.*

Discussion: The project will not require the use of an onsite wastewater treatment system and will not generate wastewater. An important component to understanding the subsurface system in Trinidad is the influence of septic systems on groundwater flow. All properties within the City discharge wastewater to individual septic systems or other onsite wastewater treatment systems. Groundwater flow into the subsurface system below the City is limited by the capacity of the upper soil layer to infiltrate water (the aquifer) and carry it in the groundwater and the two creeks (to the north and south) which direct groundwater away from the City. Thus, it is believed that flow from septic discharge constitutes a significant portion of the groundwater flow, especially during the summer months.

A geotechnical investigation (GHD, 2012) was completed to determine existing groundwater flow patterns and physical properties of the aquifer to understand subsurface conditions so that stormwater can be effectively infiltrated without negatively affecting the function of the numerous existing on-site wastewater treatment systems (OWTS/septic systems) by raising groundwater levels, or by combining with wastewater flow to impact bluff stability. During project design, GHD reviewed health department files, and known locations of septic systems were taken into account. A review of the City's groundwater model was conducted by HydrolGeologic, Inc. (HGL, 2013). The model was found to be consistent with data in the Geotechnical Analysis Report (GHD, 2012). The model was verified against observed potentiometric elevations and was found to be consistent with field observations.

In the Slope Stability Analyses prepared by Crawford and Associates (2013), comparisons were made between groundwater elevations under existing conditions and under maximum (peak) infiltration based on a 50-year storm. Each section was analyzed to determine the critical failure surface, recognizing that the south bluffs along Trinidad Bay have experienced past failures within the terrace soils. The analyses

showed a relatively small (about 15% or less) reduction in factor of safety at the 50-year storm event; however, the 50-year event will result in a peak groundwater level for only a few hours in duration. Crawford and Associates did not observe evidence of significant instability along these slopes, and they do not anticipate short-term increases in hydraulic head to have an adverse impact to these slopes or septic systems (C&A, 2013).

Because the project does not include septic tanks or alternative wastewater disposal systems, and because the stormwater improvements will not impact or be located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems, a less than significant impact would occur.

Mitigation Measures:

Mitigation Measure 3: Erosion Control. An erosion control plan will be included as part of the Grading Permit application. At a minimum the following erosion control actions shall be included in the plan and implemented by the construction contractor to prevent soil erosion and sedimentation during construction. Erosion and sediment control actions will be in effect and maintained by the contractor on a year-round basis until all disturbed areas are stabilized.

- 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.

- 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.

8. GREENHOUSE GAS EMISSIONS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Setting:

The California Global Warming Solutions Act of 2006 (Assembly Bill 32) definitively established the state's climate change policy and sets GHG reduction targets (Health & Safety Code §38500 et seq.). The state set its target at reducing greenhouse gases to 1990 levels by 2020. The North Coast Unified Air Quality Management District (NCUAQMD) does not have rules, regulations, or thresholds of significance for nonstationary or construction-related GHG emissions. In 2011, the NCUAQMD adopted Rule 111 - Federal Permitting Requirements for Sources of Greenhouse Gases to establish a threshold above which New Source Review (NSR) and federal Title V permitting applies and to establish federally enforceable limits on potential to emit greenhouse gases for stationary sources. These are considered requirements for stationary sources and should not be used as a threshold of significance for non-stationary source projects.

An individual project does not generate enough GHG emissions to significantly influence global climate change (AEP 2007). Rather, global climate change is a cumulative impact. This means that a project may exacerbate a potential impact through its incremental contribution combined with the contributions of all other sources of GHG. In assessing cumulative impacts, it must be determined if a project's

incremental effect is "cumulatively considerable." (CEQA Guidelines §15064(h)(1)). Due to the nature of the proposed project (storm drain improvements), the City has determined that it is appropriate to assess potential GHG impacts qualitatively—as allowed by CEQA Guidelines §15064.4(a)(2).

The existing Trinidad General Plan predates modern planning relevant to GHG emissions and global warming. The City is in the process of updating its General Plan and has prepared a Draft Climate Action Plan (CAP) which is available on the City's website. The Draft CAP is meant to serve as a template or framework to assist Trinidad in adopting its own CAP and implementation measures. The overarching goal of the Draft CAP is to provide support for greenhouse gas reduction measures by providing supporting policies and guidelines which focus on the reduction of gasses, either indirectly such as through waste diversion or livability, or directly through energy efficiency and reduced vehicle miles traveled. The Draft CAP provides tools and recommendations to increase community involvement, awareness, and implementation of emission reduction measures.

The project site is located along the main streets of town, in area with a mix of residences and open space. It is located within City rights-of-way and will provide improved stormwater infrastructure for the protection of receiving waters.

Analysis:

a) Finding: The project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. *Less than significant impact.*

Discussion: Sources of greenhouse gas emissions from the proposed project will occur during short-term construction. Long-term operation will not produce greenhouse gas emissions other than minor maintenance activities similar to what is already occurring for the stormwater system.

Construction of the project would cause GHG emissions as a result of combustion of fossil fuels used in construction equipment as well as materials used in construction. The project would require the use of several pieces of heavy earthmoving equipment, delivery trucks, construction commute and utility vehicles, paving equipment, generators, and other small engine-powered tools, all of which will be maintained to meet current emissions standards as required by the California Air Resources Board (CARB) and the North Coast Unified Air Quality Management District (NCUAQMD).

The NCUAQMD has not adopted a threshold for construction-related GHG emissions against which to evaluate significance and has not established construction generated criteria air pollutant screening levels above which quantitative air quality emissions

would be required. The Sacramento Metropolitan Air Quality Management District (SMAQMD) has recommended a threshold of 1,100 metric tons per year of CO2 equivalent for construction (SMAQMD 2015). Project emissions during construction of the project would not approach this threshold level of emissions, which is associated with much larger projects. Therefore, the project would not cause a considerable contribution to the cumulative GHG impact. Given the project's relatively limited scale, scope, and duration, it would not have a noticeable or considerable contribution to the cumulative GHG impact. Therefore, the proposed project will not generate greenhouse gas emissions that may have a significant impact on the environment. The impact would be less than significant.

b) Finding: The project will not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. *Less than significant impact.*

As stated above, the City of Trinidad has prepared a Draft CAP as part of the General Plan update process, but has not yet adopted it or any formal GHG emission reduction policies in its General Plan. The County has adopted a resolution in commitment to reduce GHG emissions. Although the project would produce a minor amount of construction-related emissions, the project would not conflict with these plans and policies and there would be no impact.

Mitigation Measures:
None proposed.

9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	

d) Be located on a site which is included on a list of hazardous materials sites complied pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?			X	

Setting:

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/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.

The City has an adopted City Emergency Plan. The purpose of this plan is to ensure that the City will be prepared to respond effectively in the event of emergencies to save lives, restore and protect property, repair and restore essential public services, and provide for the storage and distribution of medical, food, water, shelter sites, and other vital supplies to maintain the continuity of government.

The project is located within public rights-of-way located on the south edge of town. Trinidad Elementary School is located approximately 150 ft. to the north of the closest section of the project area. The closest public airport to the project area occurs approximately 5.5 miles to the south (Arcata-Eureka Airport); the United States Coast Guard Air Station is also located adjacent to the Arcata-Eureka Airport.

Analysis:

a) Finding: The project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. *Less than significant impact.*

Discussion: Project construction would require the use of hazardous materials such as fuels, lubricants, paints, and solvents. 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. The proposed infiltration system includes grassy swales an infiltration basins intended to diffuse, capture and/or treat potential contaminants in the stormwater prior to reaching receiving waters. Therefore, the project will not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials.

b) Finding: The project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. *Less than significant impact.*

Discussion: 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. Because the City, contractors, and other construction service providers would be required to comply with existing hazardous materials laws and regulations for the safe transport 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. Further, with Mitigation Measure 3, an additional level of safety would occur with the requirement to implement BMPs with regard to erosion, sediment and runoff.

c) Finding: The project will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. *Less than significant impact.*

Discussion: Trinidad Elementary School is located approximately 150 feet to the northeast of the project area at the closest point. No aspect of the Trinidad Stormwater Project improvements are expected to emit hazardous materials upon operation. And as noted above, the City, contractors, and other construction service providers would be required to comply with existing hazardous materials laws and regulations for the safe transport, use, and disposal of hazardous materials. Therefore, the impact is less than significant.

d) Finding: The project will not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. *No impact.*

Discussion: 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 (Attachment 11). 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 (Attachment 12). The project 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. No impact would occur.

e) Finding: The project will not, for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area. *No impact.*

Discussion: There are no public or private airports within two miles of the project. The nearest public airport, Arcata-Eureka Airport, is located approximately 5.5 miles south of the project area. The project would not result in airport-related safety hazards for people residing or working in the project area. No impact would occur.

f) Finding: The project will not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan. *Less than significant impact.*

Discussion: The Humboldt County Sheriff's Office of Emergency Services (OES) coordinates countywide response to disasters. OES is responsible for (1) alerting and

notifying appropriate agencies when disaster strikes; (2) coordinating all agencies that respond; (3) ensuring resources are available and mobilized in times of disaster; (4) developing plans and procedures for response to and recovery from disasters; and (5) developing and providing preparedness materials for the public. The OES would coordinate evacuation planning in the event of seismic events, tsunamis, slope failure, floods, storms, fires, and hazardous materials spills. The OES is responsible for maintaining the Humboldt County Emergency Operations Plan (available at: https://humboldtgov.org/374/Emergency-Operations-Plan), which serves to address the planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting Humboldt County. OES also maintains specific hazard response plans for earthquake, flooding, tsunamis, coastal storms, and other events. These response plans are used to determine the most appropriate evacuation routes based on the nature and extent of hazard.

As noted previously, the City also has an adopted City Emergency Plan. The City's plan is consistent with OES's plan and the project won't interfere with either plan. The project will not impair or interfere with any emergency response/evacuation plans and does not include development that would significantly increase the number of people exposed to potential emergencies. Furthermore, traffic control and detours may be required during construction, but no roads would be completely closed as a result of project activities (also see discussion in Section 17 - Transportation and Traffic). A less than significant impact would occur.

g) Finding: The project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized area or where residences are intermixed with wildlands. *Less than significant impact.*

Discussion: Government Code Sections 51175-89 directs the California Department of Forestry and Fire Protection (CAL FIRE) to map areas of very high fire hazard within Local Responsibility Areas (LRA). Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on relevant factors such as fuels, terrain, and weather. Most of the project area is located in a "High" fire hazard severity zone within the LRA, as classified by Cal Fire; other parts of the City are classified as "Moderate" (CAL FIRE 2008) (Attachment 13). This hazard rating does not designate areas where fires are most likely to occur, rather it is based on how severe the damage would be. Therefore, structures built in areas with higher severity ratings have to meet stricter building code standards, which the City follows.

For the approximately 16 square miles of the Trinidad Planning Area, there are two volunteer fire departments—one in Trinidad proper and the other in Westhaven. CalFire is also stationed on Patricks Point Drive, approximately one mile north of the

City, and they respond to emergencies like wildland and structure fires, floods, earthquakes, hazardous material spills, and medical aids. Mutual aid agreements exist between all of the stations, continuing the agreement from the 1980's that were generated from a fire in Trinidad State Park that threatened residences along Underwood Drive.

Construction involving heavy equipment, vehicles, power tools, and personnel smoking in and around the project site could cause the ignition of a wildfire. However, the project site is within mostly paved areas of Trinidad and adjacent to the coast with generally high humidity and cool temperatures, so the possibility of igniting a wildfire is remote. The impact is less than significant.

Mitigation Measures:
None proposed.

10. HYDROLOGY AND WATER QUALITY. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would: i) result in substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite			X	

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;			X	
iv) impede or redirect flood flows			X	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			X	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Setting:

The Trinidad Planning Area is 15.5 square miles (9,924 acres) in area and contains the watersheds of 13 coastal streams (Attachment 14). The major coastal streams that flow through City boundaries are Mill Creek, McConnahas Mill Creek, and Parker Creek. Three primary threats to water quality have been identified though the City's past watershed planning efforts, which are: sediment, onsite wastewater treatment systems (OWTS), and stormwater (TRWMWG 2008). 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 Creeks (the City's undeveloped secondary water supply) as "Critical Water Supply Areas," and the County has also designated Luffenholtz Creek as such in its general plan.

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 (Figure 2 and Attachment 14). 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 Trinidad Kelp Beds 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.

Elevation of the project area ranges from approximately 30 feet above mean sea level at the Harbor Parking Area to approximately 180 feet at the Underwood Street location. Topography varies from relatively flat, to very steep. Edwards Street slopes gently to the west, and then more steeply to the south further down; Ewing Street slopes towards

the south; Underwood Drive is relatively flat. Coastal bluffs adjacent to Edwards Street slope steeply towards Trinidad Bay to the south.

FEMA did not determine flood hazard areas for Trinidad (Zone D) because its steep slopes render the risk of flooding generally nonexistent. FEMA and the City of Trinidad have an agreement that flood insurance is unnecessary in this area, and thus most of Trinidad was not included on the National Flood Insurance Maps. According to FEMA (2017) Flood Map No. 06023C0495G, the project is outside of any coastal flood hazard areas (Attachment 15). The project parcels are not located in an area that would be subject to inundation from a mudflow. Due to the known seismic activity around 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* (CGS 2009). The tsunami runup elevation is approximately 40 feet above mean sea level depending on the local topography (Humboldt County WebGIS). The stormwater infiltration basins within the harbor parking lot will be within the tsunami runup zone; the remainder of the project area is well outside the zone (Attachment 16).

Analysis:

a) Finding: The project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. *Less than significant impact.*

Discussion: Trinidad ASBS and other nearshore 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; this could include 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 existing ASBS while construction is occurring. Incorporation of erosion control measures per Mitigation Measure 3 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 along with an erosion control plan (also see Mitigation Measure 3) 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. With

incorporation of Mitigation Measure 4, Construction Dewatering Protocol, into the project, the potential impact from construction dewatering activities would be held to a less than significant level by sequencing construction to coincide with the period of the lowest groundwater levels at the site to eliminate the need for dewatering. It is unlikely that dewatering would be required, geotechnical investigation results indicated rapid groundwater movement and infiltration. However, if dewatering is needed, Mitigation Measure 4 also includes proper management actions to reduce water pollution.

With implementation of Mitigation Measures 3 and 4, the impacts to water quality would be less than significant after mitigation.

b) Finding: The project will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. *Less than significant impact.*

Discussion: The proposed project area and City of Trinidad are within the Trinidad Hydrologic Unit. Groundwater within the Trinidad area is variable. A groundwater study and model were prepared for this project (GHD 2012). Most of the proposed project improvements will occur within already paved areas. Project operations will not require the use of groundwater and will not create new impervious surfaces. Rather, the project will increase infiltration of stormwater. Therefore, the proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge.

As discussed above, 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.

c.i) Finding: The 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 or through the addition of impervious surfaces, in a manner which would: i) result in substantial erosion or siltation on- or off-site. *Less than significant impact.*

Discussion: There are no streams or rivers flowing through the project site. Work within the existing public rights-of-way will not alter drainage patterns. The design is based on site specific soils and geologic studies. The project will not generate new stormwater. The project components are located within existing, developed street rights-of-way. Infiltration is expected to improve as a result of this project, eliminating the discharge of untreated stormwater into the Trinidad Head ASBS.

c.ii) Finding: The 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 or through the addition of impervious surfaces, in a manner which would: ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. *Less than significant impact.*

Discussion: There are no streams or rivers flowing through the project site. Work within the existing public rights-of-way will not alter drainage patterns. The design is based on site specific soils and geologic studies. The project is likely to reduce the amount of surface runoff after project completion as LID components such as grassed swales are proposed. Trinidad is not subject to flood hazards (Attachment 15). Therefore, the project will not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite

c.iii) Finding: The 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 or through the addition of impervious surfaces, in a manner which would: iii) create or contribute runoff water which would exceed the capacity of the existing or planned stormwater drainage system to provide substantial additional sources of polluted runoff. *Less than significant impact.*

Discussion: There are no streams or rivers flowing through the project site. Work within the existing public rights-of-way will not alter drainage patterns. The design is based on site specific soils and geologic studies and will improve the City's stormwater management system. A drainage and erosion control plan utilizing BMPs that are in accordance with the Humboldt Low Impact Development Stormwater Manual will be required by the City (see Mitigation Measure 3). The project will not create new impervious surfaces or runoff; it has been designed to better accommodate existing runoff and comply with the ASBS discharge prohibition. It is likely that the improvements will allow the stormwater system to accommodate larger storms than the existing system. Therefore, the project will not create runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.

c.iv) Finding: The 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 or through the addition of impervious surfaces, in a manner which would: iv) impede or redirect flood flows. *Less than significant impact.*

Discussion: There are no streams or rivers flowing through the project site. Work within the existing public rights-of-way will not alter drainage patterns. The final design is based on site specific soils and geologic studies. The project sites are not located within a flood zone. The purpose of this project is to improve the efficiency of the existing

drainage system. In addition, the project does not involve construction of any housing. Therefore, the proposed project will not impede or redirect flood flows.

d) Finding: The project is not at substantial risk to release pollutants due to project inundation by flood hazard, tsunami, or seiche. *Less than significant impact.*

Discussion: According to the Humboldt Operational Area – Hazard Mitigation Plan (HMP), the project area is not located within a dam failure inundation area. There are no large bodies of water upstream of Trinidad. Based on area characteristics, the project site is not down-gradient of a debris-flow source and would not be subject to mudflows. The project site is also not near any enclosed water body capable of producing a seiche event. Therefore, the proposed project will not result in inundation by flood hazard, seiche or mudflow.

According to the State of California Humboldt County Tsunami Inundation Map for Emergency Planning, the tsunami inundation zone in Trinidad generally extends up to about 40 ft. in elevation (CGS 2009). The HMP includes information on risk assessment and mitigation strategies for hazards from dam failure and other hazards such as flooding, tsunamis, earthquakes, etc. Although the lower infiltration basins could be inundated by a tsunami, the proposed project does not include activities or components which will release pollutants due to project inundation by a tsunami. A less than significant would occur.

e) Finding: The project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. *Less than significant impact.*

Discussion: This project will implement the City's 2016 ASBS Compliance Plan that has been approved by the State Water Resources Control Board (City of Trinidad, 2016). The project will result in the elimination of the City's untreated stormwater discharge into the Trinidad Head ASBS for up to a 50-year, 24-hour storm event in compliance with the discharge prohibition of the California Ocean Plan. There is no groundwater management plan drafted or in effect for the Trinidad area. Therefore, the project will not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Mitigation Measures:

Mitigation Measure 4: Construction Dewatering Protocol.

Excavation and below grade work will be scheduled during summer/fall to coincide with the period of the lowest groundwater levels at the site and the timeframe with the least chance for rainfall. If groundwater is encountered, the contractor, in coordination with the City will evaluate options for dewatering management. If dewatering is

necessary, one or more of the following management options shall be used by the construction contractor to protect water quality:

- Reuse the water on-site for dust control, compaction, or irrigation, as appropriate.
- Retain the water on-site in a grassy or porous area to allow infiltration/evaporation.
- Discharge (by permit) to a sanitary sewer or storm drain (this option may require a temporary method to filter sediment-laden water prior to discharge). If discharge to a storm drain (i.e., surface waters) is the only feasible option, the project will comply with Water Board requirements for construction dewatering. Actions may include characterizing the discharge and receiving waters and developing a BMP Plan including filtering methods, monitoring and reporting requirements, and a description of the pump systems proposed to remove groundwater and maintain a dry work area.

11. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

Setting:

Most of the project components will be within existing developed public rights-of-way (ROW) as shown in Figure 3. ROW do not have zoning or land use designations associated with them (Figure 4). The infiltration basins within the Harbor parking lot will be located in an area zoned Commercial. Land uses adjacent to other portions of the project area mostly residential, with some open space and public facility (Humboldt State University Marine Lab) as well.

Analysis:

a) Finding: The project will not physically divide an established community. *No impact.*

Discussion: The project does not include any structures that would impede circulation and is primarily at or below ground level. Therefore, the project will not physically divide an established community. There is no impact.

b) Finding: The project will not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. *Less than significant impact.*

Discussion: The project area is entirely within the Trinidad City Limits and the California Coastal Zone. The City has a Local Coastal Program (LCP) that has been certified by the Coastal Commission, except for the Harbor area, which is an Area of Deferred Certification (ADC). Therefore, most of the project is within the City's Coastal Development Permit jurisdiction, and within the Coastal Commission's appeal jurisdiction. However, the infiltration basins in the Harbor parking lot will have to obtain a Coastal Development Permit (CDP) directly from the Coastal Commission. Once the final design is completed, the City will process and approve a CDP in accordance with the City's LCP and the California Coastal Act and will also apply to the Coastal Commission for a CDP for the portion within the ADC.

Project activities are consistent with normal activities and improvements within traveled rights-of-way and will not conflict with existing land use and zoning. The project would not require a General Plan Land Use designation or zoning change and would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The impact would be less than significant.

Mitigation Measures:
None proposed.

12. MINERAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

Setting:
There are no mining operations within the City limits and no known mineral resources. The only nearby activities include hard rock quarries: one exists off Quarry Road (Mercer-Fraser Company); several others are located on Green Diamond Timber land to the east. These quarries provide an important source of jetty-quality rock. No mineral of state importance has been identified in or near the City's planning area.

Analysis:

a) Finding: The project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. *No impact.*

Discussion: No known mineral resources have been identified within the project area. Therefore, the proposed project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

b) Finding: The project will not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. *No impact.*

Discussion: No known mineral resources have been identified in the project area. Neither the City of Trinidad General Plan, nor the Humboldt County General Plan have included the project area or any other nearby location as being designated a locally important mineral resources or recovery site. Therefore, the proposed project will not result in the loss of availability of a locally-important mineral resource site delineated on a local general plan, specific plan or other land use plan.

Mitigation Measures:
None proposed.

13. NOISE. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		

b) Generation of excessive ground borne vibration or ground borne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

Setting:
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 300 ft. north of the nearest project component.

The California General Plan Guidelines (GOPR 2017) 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.

Analysis:

a) Finding: The project will not Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. *Less than significant impact with Mitigation Incorporated.*

Discussion: The construction of the project would require the use of heavy equipment for excavation and installation of the storm drain infrastructure, and would temporarily increase ambient noise levels for the duration of the project. However, construction operations would occur for only a limited duration of time and during the day in order

to minimize impacts. During construction, noise levels would vary based on the amount of equipment in operation and the location of the activity. Noise levels would be consistent with the reference noise levels in Table 3.2: Construction Equipment Reference Noise Levels as Measured at 50 feet, below.

Table 3.2: Construction Equipment Reference Noise Levels as Measured at 50 feet

Equipment	Noise Level (dB*)	Equipment	Noise Level (dB*)
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

Source: FHWA 2006
*dB is a weighted decibel measurement for assessing hearing risk and, therefore, is used by most regulatory compliance agencies.

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 and construction of the project components. The closest sensitive receptors are neighboring homes, some of which are less than 50 ft. away from the construction areas. These would be in close proximity to construction equipment and activities potentially using backhoes, drill rigs and excavators. 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 3.2.

A typical building can reduce noise levels by 15 dB with the windows closed (GOPR 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, over approximately five to six months during weekdays).

To avoid and minimize adverse effects to sensitive noise receptors, Mitigation Measure 5, Noise Reduction Actions, 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 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.

Section 15.16.210 of the City's Grading Ordinance specifies that construction activities within 1,000 ft. of any residence shall be limited to the hours of 8:00 a.m. to 5:30 p.m., unless other hours are specified by the City Engineer. In this case, the City Engineer has suggested a longer window of time (7:00 a.m. to 6:00 p.m.) in order to avoid the need for construction on weekends, to keep the construction window to less than six months and to keep costs down. Section 15.16.080 of the grading ordinance allows the Planning Commission to place a variety of conditions on a project in order to minimize impacts. These include limitations on the hours of operation or the period of year in which construction can take place, as well as limitations on the size or type of equipment that may be used. These conditions will ensure that appropriate measures are taken, based on the final design and specifications of the project, to ensure that impacts are minimized.

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. Noise associated with maintenance activities would be generated adjacent to limited noise-sensitive uses (residences). This incremental noise generation would not expose persons to noise levels in excess of applicable standards and would not represent a substantial increase in noise. Therefore, a less than significant impact would occur.

b) Finding: The project will not generate excessive groundborne vibration or groundborne noise levels. *Less than significant impact.*

Discussion: Short-term construction activities (5 to 6 months) would not be expected to generate significant groundborne noise or vibration. Some short-term minor vibrations may occur during construction activities but will be minimized by the same measure that limits hours of construction for noise (See discussion under subsection 'a' above). Therefore, the proposed project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels.

c) Finding: The project will not, for a project located within the vicinity of a private air strip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport, expose people residing or working in the project area to excessive noise levels. *No impact.*

Discussion: This project is not located within two miles of an airport or within an airport land use plan. The closest public airports to the project area occur approximately 5.5 miles to the south (Arcata-Eureka Airport) and approximately 12 miles to the south (Murray Field). The closest military airport is the United States Coast Guard Air Station which is located adjacent to the Arcata-Eureka Airport approximately 5.5 miles to the south of the project area. Therefore, the project will not, for a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels. The project area is not within the vicinity of a private airstrip. Therefore, the proposed project will not expose people residing or working in the project are to excessive noise levels.

Mitigation Measures

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 6:00 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.
- 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.

14. POPULATION AND HOUSING. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Induce substantial population growth in an area, either directly (e.g., by proposing new homes and/or businesses) or indirectly (e.g., through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X

Setting:

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. The proposed storm water infrastructure improvements will be located within and along existing roads.

Analysis:

a) Finding: The project will not induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). *No impact.*

Discussion: The project does not propose new homes or residential infrastructure. The project will not expand the capacity of the existing stormwater system. Therefore the project will not induce substantial population growth in the area, either directly or indirectly.

b) Finding: The project will not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. *No impact.*

Discussion: The project, consisting of storm water infiltration and infrastructure improvements within existing rights-of-way to improve storm water drainage, will not displace any houses. Therefore, the project will not displace a substantial number of existing housing, necessitating the construction of replacement housing elsewhere.

c) Finding: The project will not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. *No impact.*

Discussion: The project will not displace any people or structures. Therefore, the proposed project will not displace substantial number of people, necessitating the construction of replacement housing elsewhere.

Mitigation Measures:
None proposed.

15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Fire protection?				X
b) Police protection?				X
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Setting:

The project area is located within the City of Trinidad. There are two volunteer fire departments within the approximately 16 square mile planning area, one within Trinidad City limits and the other in Westhaven. CALFIRE is also stationed on Patricks Point Drive, and they respond to emergencies such as wildland and structure fires, floods, earthquakes, hazardous material spills, and medical aids. Mutual aid agreements exist between all of the stations. The Humboldt County Sheriff's Office is contracted by the City of Trinidad for police services.

The project site is part of the Trinidad Elementary School and Northern Humboldt Union High School Districts. The closest school to the project site is Trinidad Elementary School, which is located approximately 150 ft. to the north of the closest portion of the project. The nearest public parks include Trinidad State Beach adjacent to the southwestern portion of the project area, and Saunder's Park approximately 1,100 ft. to the northeast. Other nearby recreational facilities include coastal trails adjacent to the

project, Trinidad Head, the Trinidad Tennis Courts and Trinidad Elementary School, which is open for general public recreation outside of school hours.

Analysis:

a) Finding: The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services. *No impact.*

Discussion: The project would not result in significant adverse effects on service ratios for the TVFD. This is because the project is designed to serve existing users, not to attract additional users. In addition, the proposed improvements are located in an area that is already served by the TVFD so that the project would not require extension of fire protection services into areas not already served. Therefore, the proposed project will not result in substantial adverse impacts associated with the provision of fire protection services.

b) Finding: The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection services. *No impact.*

Discussion: The project would not result in adverse effects on service ratios for the police departments. This is because the project is designed to serve existing users, not to attract additional users. In addition, the proposed improvements are located in an area that is already served by the County Sheriff, and the project would not require extension of police protection services into areas not already served. Therefore, the proposed project will not result in substantial adverse impacts associated with police protection services.

c) Finding: The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. *No impact.*

Discussion: The project, consisting of storm water infrastructure improvements within existing rights-of-way, will have no effect on the population or school enrollment.

Therefore, the proposed project will not result in substantial adverse impacts associated with public schools.

d) Finding: The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. *No impact.*

Discussion: The project is designed to improve storm water drainage within existing rights-of-way. The project does not include proposed additional housing and is not expected to draw significant numbers of new users. Therefore, the proposed project will not result in substantial adverse impacts associated with parks.

e) Finding: The project will not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any other public facilities. *No impact.*

Discussion: No other public facilities or public services apply to, or are affected by, the project. Therefore, the proposed project will not result in substantial adverse impacts associated with other public facilities.

Mitigation Measures:
None proposed.

16. RECREATION. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

Setting:

Activities available to local residents and visitors include recreational and educational programs at the elementary school, fraternal organization activities, sport fishing, beachcombing, hiking, picknicking, sightseeing, and related activities. Fishing and coastal access are two of the primary attractions for visitors coming to Trinidad. Publicly owned recreation areas in the project area include the school and its playground areas, City Hall (which is used for social and fraternal functions), the adjacent tennis court, Saunder's Park, Trinidad Head, Trinidad State Beach, and other public beaches. Most public access to the harbor and beaches is via Edwards Street. A trails map of the City is provided as Attachment 17.

Analysis:

a) Finding: The project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. *No impact.*

Discussion: As discussed above under the Population and Housing section, the project will not induce population growth. It is also not expected to draw significant number of new visitors, since the project will improve existing facilities and expand public facilities or infrastructure. Upon project completion, existing access and recreational facilities will remain the same. No new roads or trails are proposed. Therefore, the proposed project will not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

b) Finding: The project will not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. *No impact.*

Discussion: The project includes improvements within existing, developed rights-of-way to improve storm water drainage. No new recreational facilities or access are proposed. Construction activities may inhibit access to certain trails. But those impacts will be temporary, lasting no more than approximately six weeks in any one location. And in general, there are multiple access routes to most recreational areas, such as Trinidad Head and local beaches. Therefore, the proposed project will not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Mitigation Measures:
None proposed.

17. TRANSPORTATION/TRAFFIC. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Conflict with a plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?		X		
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
d) Result in inadequate emergency access?		X		

Setting:

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 majority of the project occurs along portions of Edwards Street, Underwood Drive, Ewing Street, lower Van Wycke, and the Harbor parking area. Edwards Street is designated as a primary collector in the Trinidad General Plan. Ewing Street and Underwood Drive are local streets and do not provide through access.

No marked bike routes currently exist within the project area. Edwards Street is designated as part of the California Coastal Trail. Underwood, Ewing, Van Wycke and the Harbor parking area also provide public access to local trails and beaches.

Analysis:

a) Finding: The project will not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. *Less than significant impact with mitigation incorporated.*

Discussion: The proposed project would temporarily restrict travel to one-way traffic within the project area rights-of-way while construction activities are underway. The project has been designed to improve drainage of the existing rights-of-way and does not propose any new roads or transportation facilities.

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 equipment remove debris, and 3) partial lane/road closures during construction. Very short duration closures of Edwards Street, Underwood Drive, Ewing Street, and Van Wycke Street, with detours available, may be required for construction of drainage facilities. Generally, one lane of travel can be kept open during most activities, as well as side streets, which will allow continued access to all areas of the community.

Project construction activities would have an anticipated duration of approximately five to six months (summer 2020), assuming five work days per week from the hours of 7:00 a.m. to 6:00 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.

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. 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 (*Traffic Control Plan*) would reduce potentially significant impacts to less than significant.

The proposed project would not conflict with effective circulation system performance or intersection level of service standards. Based on the above, the project: (1) would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system; (2) would take into account all modes of transportation, including mass transit and non-motorized travel; and (3) would take into account other components of the transportation system, such as intersections, streets, pedestrian paths, and bicycle paths.

b) Finding: The project will not conflict or be inconsistent with CEQA Guidelines section 15064.3. *Less than significant impact.*

Discussion: The project consists of improvements to the stormwater system that are designed to accommodate and infiltrate existing stormwater and will not increase the capacity of the stormwater system. The project will not generate traffic other than during construction, nor will it alter transportation routes. Therefore, the project will not increase Vehicle Miles Traveled (VMT) will not be inconsistent with CEQA Guidelines §15064.3.

c) Finding: The project will not substantially increase hazards due to geometric design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). *Less than significant impact.*

Discussion: The project would not change the geometry of the street or roadway network in Trinidad. The proposed improvements would be located below grade once constructed. Therefore, no potentially hazardous roadway design features would be introduced by the project. Temporary traffic hazards and control are discussed in more detail under 'a' above.

d) Finding: The project will not result in inadequate emergency access. *Less than significant impact with mitigation.*

Discussion: The project is located within the city limits of the City of Trinidad, on the west side of Highway 101. The project will not substantially alter the existing emergency access and the likelihood of a need for emergency services in this area is very low. Construction would primarily take place in the public ROW. A traffic control plan (see Mitigation Measure 6) will be developed to route traffic and maintain emergency and other access during construction. 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.

The proposed project would be within and adjacent to existing street systems. 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.

Mitigation Measures

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 the 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, potential impacts on traffic circulation attributable to the project would be reduced to a less than significant level.

17. TRIBAL CULTURAL RESOURCES. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a Tribal Cultural Resource, as defined in Public Resources Code section 21074, that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k).		X		
b) Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code section 21074, determined by the Lead Agency to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1.		X		

Archaeological and other heritage resources can be damaged or destroyed through uncontrolled public disclosure. Archaeological site locations and culturally sensitive information is considered confidential and public access to such information is restricted by state and federal law, therefore, this information has been redacted for use in the Mitigated Negative Declaration (MND). Professionally qualified individuals, as determined by the California Office of Historic Preservation, may contact the lead agency directly in order to inquire about its availability.

Information regarding the location, character or ownership of a historic resource is exempt from the Freedom of Information Act pursuant to 16 U.S.C. 470w-3; Section 304 of the National Historic Preservation Act, 36 CFR 800(6)(a)(5) and 36 CFR 800.11(c); Section 9(a) of the Archaeological Resources Protection Act; Executive Order 13007; Section 6254.10 and GC 6254(r) of the California State Government Code and the California Public Records Act (CPRA); and the 2005 California Senate Bill 922.

Setting:

The City of Trinidad lies within the traditional territory of the Yurok Indians who lived within the Trinidad area and the ancestral village of Tsurai. The proposed project area along the Edwards and Van Wycke Streets lies close to the known Yurok Village site of Tsurai. The surrounding areas, including all of the Trinidad townsite and Trinidad 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. There are currently recorded archeological sites within the Trinidad area. Qualified professionals can refer to the 2018 Archaeological Survey Report by WRA (2018) for further details regarding archaeological sites.

The Ancestral village of Tsurai is situated within Yurok ancestral territory, as well as within the larger cultural landscape of the Yurok people. The surrounding landscape, particularly Trinidad Head, is central to Yurok creation stories and oral tradition. Yurok oral history identifies Tsurai and its surrounding landscape, as areas of profound significance to Yurok culture. Yurok creation stories recorded by Kroeber recount the story of Tsurewa Man and his role in the creation of the Yurok world. The Yurok Tribe considers Tsurai Village and Trinidad Head to be sacred sites, as well as areas of archaeological and cultural significance. Under national guidelines for identifying historic properties/resources, both the village of Tsurai and Trinidad Head would be considered Traditional Cultural Properties for purposes of the National Register and as Tribal Cultural Resources for the purposes of CEQA (WRA 2018).

Tsurai Village, Trinidad Head, the sea stacks, and other landscape features within the Trinidad viewshed are components of the Yurok cultural landscape embedded with deep cultural significance to Yurok people. This relationship and significance are well

documented in both Yurok oral history and early ethnographic research. The Trinidad area continues to be of important cultural and spiritual significance to contemporary Yurok people (WRA, 2018).

a) Finding: The project will not Cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource Listed or Eligible for Listing in the California Register of Historical Resources, or in a Local Register of Historical Resources as Defined in Public Resources Code Section 5020.1(k). *Less than significant with mitigation.*

Discussion: Because of the cultural significance and sensitivity of the entire Trinidad area, there is a risk of encountering Native American resources and/or impacting a Tribal Cultural Resource.

An Archaeological Survey Report for the project was completed by William Rich & Associates (WRA) in August 2018. The investigation analyzed the impacts of the project on Tribal Cultural Resources and stated on Page 8, "*Under national guidelines for identifying historic properties/resources, both the village of Tsurai and Trinidad Head would be considered Traditional Cultural Properties for purposes of the National Register and as Tribal Cultural Resources for the purposes of CEQA*." The project area does not include the Tsurai Village or Trinidad Head; however, it is recognized that areas well outside of the Village proper were part of the normal use and activities associated with the Village.

Multiple cultural resources have been recorded as a result of the studies in the Trinidad area, however none are located directly within the project area (WRA 2018). The Northwest Information Center has no records of cultural resources directly within the proposed project area. Fifteen archaeological sites are, however, located within the ½ mile buffer. Three of these sites are located in close proximity including archaeological materials associated with the village of Tsurai on Trinidad Bay.

Although no specific Native American or historic period archaeological sites are known directly in the project area, it is anticipated that such deposits may exist. The Trinidad Rancheria, Tsurai Ancestral Society, and the Yurok Tribe have indicated that ceremonial places and ethnographic landscapes, such as the village of Tsurai and surrounding areas; particularly, Trinidad head are areas of profound spiritual significance to Yurok culture.

The WRA Archaeological Survey Report, notes on Page 19, that on the afternoon of April 5, 2018, Mr. Rich met and walked the proposed project area with the Trinidad Rancheria's Tribal Historic Preservation Officer (THPO) Rachel Sundberg. Ms. Sundberg indicated that, "*all ground disturbance should be monitored, and acknowledged that significant cultural resources in Trinidad extend well beyond the recorded boundaries of the Tsurai archaeological site and encompass an unbound cultural landscape associated with Trinidad head, Trinidad townsite and terrace*." In speaking with Ms. Lindgren-Akana of the

Tsurai Ancestral Society, she indicated that, "*all ground disturbing work should be closely monitored by tribal members with Tsurai ancestry*."

Additional concerns were expressed during a site visit on June 13, 2018, that included Yurok THPO Frankie Meyers and Yurok Councilmember Toby Vanlandingham. WRA (2018) summarizes some of their comments and concerns on page 20:

> *"Mr. Myers stated that the Yurok support the Stormwater project in principal but know that there will be impacts to cultural resources as a result. He would like to see impacts to resources and human remains minimized by limiting the number and location of the proposed 72" wide by 12' deep treatment chambers. In general, Mr. Myers would like to know if some of the treatment chambers could be replaced by installing longer storm drain pipes, moving the water to chambers installed in areas less likely to contain cultural materials or human remains. The beach parking lot is considered to be the least likely to contain these resources, and perhaps two chambers could be installed in this location instead of one? Two treatment chambers are proposed for installation within the vicinity of HSU's Marine Science Laboratory, on Ewing Street. This area has a high potential for containing cultural materials or human remains. Mr. Myers would like to see those two chambers removed from the plan and storm drain installed instead [so t]he new storm drain would flow [into the] chambers at the beach parking area below… This project involves a substantial amount of excavation, with the maximum depth of the excavations at 12 feet. Councilman Vanlandingham would like to know where the dirt will go once it is excavated? Once installed, will the treatment chambers need to be maintained/cleared of sediment and debris periodically? What about the storm drains? If so, where does this sediment and debris go? This sediment could contain cultural materials and should be treated accordingly. The State Water Board and USDA are funding the project. Mr. Myers request that a NAGPRA plan of action/monitoring plan be drafted and agreed upon before construction begins. Mr. Myers advised that Willian Rich and Associates' survey efforts should not include excavation. Tribal knowledge is sufficient for identification efforts."*

The Yurok Cultural Committee also expressed some concerns at a meeting, which took place on June 22, 2018 (see pages 20-21 of the WRA Cultural Investigation Report):

> *"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. The Council requested that open trenching methods be used and that all infiltration gallery areas (giant pipes) are consolidated or limited to prevent excavations in significant areas. Furthermore, the Council passed a motion, requesting that all infiltration pipes be moved to the bottom of the hill where the Trinidad Rancheria is conducting a parking lot project. The motion was approved by all the council members."*

It is likely not feasible to infiltrate all or even most of the stormwater into 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 infiltration area 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 among Edwards Street. The City will continue to consult with the Yurok Tribe, Trinidad Rancheria and Tsurai Ancestral Society throughout the processing of this project, including discussion of alternatives and the development of the final designs and any required permitting.

As noted above there is a possibility that historic resources, including buried archaeological materials, do exist in the area and may be uncovered during proposed project activities. All three tribal groups have requested Native American monitoring during project implementation; it is recommended that Yurok tribal monitor(s) from the Trinidad Rancheria, Tsurai Ancestral Society, 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 resources during excavation projects and should be competent to identify significant resource types and have the ability to stop work when needed.

Including monitors to observe identify and direct equipment from destroying unknown, but anticipated, archaeological sites at the proposed project area will mitigate potential inadvertent damage. It is recommended that a monitoring plan with directives, in the event human remains are discovered, be developed and approved by the Trinidad Rancheria, Tsurai Ancestral Society, and Yurok Tribe prior to the beginning of work.

Although no Tribal Cultural Resources were identified within or immediately adjacent to the Project area, and therefore, the proposed Project would not result in a significant impact to known Tribal Cultural Resource, it is recommended that the City of Trinidad continue consultation and seek approval of this inadvertent discovery plan before final permit approval. Impacts to unknown Tribal Cultural Resources that may be discovered during project construction would be less than significant with the incorporation of Mitigation Measure 3 (*Cultural Resource Protection Measures*) in Section 5 Cultural Resources.

As such, the WRA Archaeological Survey Report contains the following conclusion on Page 22, "*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*." In addition, the recommendations of the report, including cultural monitoring and developing an inadvertent discovery protocol have been included as mitigation (see Mitigation Number 2 in section 5 above). Therefore, the proposed project will not cause a substantial adverse change in the significance of a Tribal Cultural Resource Listed or Eligible for Listing in the California Register of Historical Resources, or in a Local Register of Historical Resources.

b) Finding: The project will not cause a Substantial Adverse Change in the Significance of a Tribal Cultural Resource Determined by the Lead Agency to be Significant Pursuant to Criteria Set Forth in Subdivision (c) of Public Resources Code Section 5024.1. *Less than significant with mitigation.*

Discussion: Multiple cultural resources have been recorded as a result of the studies in the Trinidad area, "*however none are located directly within the specific project area*" according to Page ii of the WRA Archaeological Survey Report. The Northwest Information Center has no records of cultural resources within the proposed project area. 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.

Although no Tribal Cultural Resources were identified within or immediately adjacent to the Project area, and therefore, the proposed Project would not result in a significant impact to known Tribal Cultural Resource Determined by the Lead Agency to be Significant, it is recommended that the City of Trinidad continue consultation and seek approval of this inadvertent discovery plan before final permit approval. Impacts to unknown Tribal Cultural Resources that would be less than significant with the incorporation of Mitigation Measure 2 in Section 5 Cultural Resources. Also see discussion under 'a' above.

Mitigation Measures:
Implement Mitigation Measure 2 in Section 5 Cultural Resources.

19. UTILITIES AND SERVICE SYSTEMS. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				X

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
d) Generate solid waste in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	

Setting:

Wastewater
The City of Trinidad does not have a centralized sewer system, and instead relies entirely on individual on-site wastewater treatment systems (OWTS). There are no plans to build a centralized sewer system in Trinidad, so land uses are limited to those that are compatible with the use of an OWTS based on lot sizes. The City does have an OWTS Management Program that requires operating permits for all OWTS in the City, which are conditioned on periodic inspections and maintenance.

Stormwater
Stormwater originating in the central portion of the City of Trinidad watershed is routed through a series of roadside ditches, drain inlets, and culverts to the stormwater outfall in the Harbor. Some areas, such as Wagner Street, have no curbs or drain inlets, so drainage is generally south towards the bluff areas or towards Parker Creek. The City is currently in the process of upgrading the stormwater system to comply with the Phase II Small MS4 General Permit requirements as well as the Construction General Permit requirements and ASBS discharge prohibitions of the State Water Resources Control Board (SWRCB). The intent is to appropriately infiltrate all the stormwater and eliminate the discharge into Trinidad Bay.

Water Service
The City of Trinidad operates a municipal water supply system that services the occupied parcels within the City and a number of properties outside the City limits. Potable water for the City system is currently supplied from Luffenholtz Creek located two miles south of the City. The water system includes an infiltration gallery, water treatment plant and several storage tanks. The City also has some limited unused water rights on Mill Creek.

Solid Waste
Trinidad currently contracts with Humboldt Sanitation and Recycling for curb-side garbage pickup and recycling for residents and businesses within the City. Most refuse is transferred to a municipal transfer station and then hauled out of state where it is disposed in, for example, the Dry Creek landfill in Oregon. There is no local landfill since the Cummings Road landfill reached capacity.

Analysis:

a) Finding: The project will not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. *Less than significant impact.*

Discussion: The proposed stormwater infrastructure improvements would not require water or generate wastewater and therefore do not involve construction of or improvements to water or wastewater facilities. Therefore, the proposed project will not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Where existing storm drainage facilities exist adjacent to the improvements, short extensions or modifications to the inlets would allow runoff to enter the existing storm drain system. Where new paving or new surface work would occur over existing utilities, all necessary elements (such as existing valve boxes, manhole lids, electrical vaults, etc.) would be raised to the new finished elevation as necessary. The project includes the construction of a new infiltration pipe at the base of Edwards Street within an existing harbor parking lot footprint. Because large-scale expansion of existing drainage facilities would not be required, nor will the project increase the system's capacity, the proposed project would not require the construction of drainage facilities that would cause significant environmental effects. Therefore, the proposed project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

b) Finding: The project will have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. *No impact.*

Discussion: The proposed improvements do not require water supply, and would not increase the capacity of or demand on the City's water system. Therefore, the proposed project will not have insufficient water supplies available to serve the project from existing entitlements and resources (i.e., new or expanded entitlements are needed).

c) Finding: The project will not result in a determination by the wastewater treatment provider, which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. *No impact.*

Discussion: The proposed stormwater infrastructure improvements would not involve construction or use of facilities that generate wastewater. Impacts on groundwater and septic systems Therefore, the project would not result in a determination by the wastewater treatment provider which services or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

d) Finding: The project will not generate solid waste in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals. *Less than significant impact.*

Discussion: The project would generate a small volume of construction waste that would be hauled by the construction contractor to an approved disposal site. Waste would include construction materials remnants, replaced materials, and worker-generated trash and debris. This would be a less than significant impact on landfill capacity with the adherence to federal, state, and local statutes and regulations related to solid waste. Therefore, the proposed project will not generate solid waste in excess of the capacity of local infrastructure.

g) Finding: The project will comply with federal, state, and local management and reduction statutes and regulations related to solid waste. *Less than significant impact.*

Discussion: The project would generate a small volume of construction waste that would be hauled by the construction contractor to an approved disposal site. Waste would include construction materials remnants, replaced materials, and worker-generated trash and debris. This would be a less than significant impact on landfill capacity with the adherence to federal, state, and local statutes and regulations related to solid waste. Therefore, the proposed project will not violate any federal, state, and local statutes and regulations related to solid waste.

Mitigation Measures:
None proposed.

20. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

Setting:

The City has an adopted City Emergency Plan. The purpose of this plan is to ensure that the City will be prepared to respond effectively in the event of emergencies to save lives, restore and protect property, repair and restore essential public services, and provide for the storage and distribution of medical, food, water, shelter sites, and other vital supplies to maintain the continuity of government.

Government Code Sections 51175-89 directs the California Department of Forestry and Fire Protection (CAL FIRE) to map areas of very high fire hazard within Local Responsibility Areas (LRA). Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on relevant factors such as fuels, terrain, and weather. Most of the project area and the entire project site is located in a "High" fire hazard severity zone within the LRA, as classified by Cal Fire (CAL FIRE 2008) (Attachment 13). The County's GIS designates the area north of Trinidad as an area of Moderate Fire Hazard Severity and the area east of Trinidad as High Fire Hazard Severity. A high fire hazard severity rating does not necessarily mean that the risk of fire is high, it means that if there is a fire, the risk of damage is high.

The project area is located within the City of Trinidad. There are two volunteer fire departments within the approximately 16 square mile planning area, one within

Trinidad City limits and the other in Westhaven. CALFIRE is also stationed on Patricks Point Drive, and they respond to emergencies such as wildland and structure fires, floods, earthquakes, hazardous material spills, and medical aids. Mutual aid agreements exist between all of the stations.

Analysis:

a) Finding: The project will not substantially impair an adopted emergency response plan or emergency evacuation plan. *Less than significant impact.*

Discussion: The Humboldt County Sheriff's Office of Emergency Services (OES) coordinates countywide response to disasters. OES is responsible for (1) alerting and notifying appropriate agencies when disaster strikes; (2) coordinating all agencies that respond; (3) ensuring resources are available and mobilized in times of disaster; (4) developing plans and procedures for response to and recovery from disasters; and (5) developing and providing preparedness materials for the public. The OES would coordinate evacuation planning in the event of seismic events, tsunamis, slope failure, floods, storms, fires, and hazardous materials spills. The OES is responsible for maintaining the Humboldt County Emergency Operations Plan (available at: https://humboldtgov.org/374/Emergency-Operations-Plan), which serves to address the planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies in or affecting Humboldt County. OES also maintains specific hazard response plans for earthquake, flooding, tsunamis, coastal storms, and other events. These response plans are used to determine the most appropriate evacuation routes based on the nature and extent of hazard.

As noted previously, the City has an adopted City Emergency Plan. The City's plan is consistent with OES's plan and the project won't interfere with either plan. The project will not impair or interfere with any emergency response/evacuation plans and does not include development that would significantly increase the number of people exposed to potential emergencies. Furthermore, traffic control and detours may be required during construction, but no roads would be closed as a result of project activities. A less than significant impact would occur.

b) Finding: The project will not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. *Less than significant impact.*

Discussion: The project will not create any new structures. The project is designed to serve existing users and will not increase the capacity of the City's stormwater system that could lead to additional growth and development. The project will be located within already paved areas of the City's rights-of-way and will generally be located at-

grade or underground. Therefore, the project does not have the potential to exacerbate wildfire risks.

c) Finding: The project will not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. *Less than significant impact.*

Discussion: The project will not create any new structures. The project is designed to serve existing users and will not increase the capacity of the City's stormwater system that could lead to additional growth and development. The project will be located within already paved areas of the City's rights-of-way and will generally be located at-grade or underground. Therefore, the project does not have the potential to exacerbate wildfire risks.

d) Finding: The project will not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. *Less than significant impact.*

Discussion: The project will not create any new structures. The project is designed to serve existing users and will not increase the capacity of the City's stormwater system that could lead to additional growth and development. The project will be located within already paved areas of the City's rights-of-way and will generally be located at-grade or underground. Therefore, the project does not have the potential to exacerbate wildfire risks.

Mitigation Measures:
None proposed.

21. MANDATORY FINDINGS OF SIGNIFICANCE.	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).			X	
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

Analysis:

a) Finding: The project will not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. *Less than significant impact.*

Discussion: Based on the analysis contained in this document and with implementation of the proposed Mitigation Measures presented herein, the project as a whole does not have the potential to significantly degrade the quality of the environment, including air quality, fish or wildlife species or their habitat, plant or animal communities, important examples of the major periods of California history or prehistory, or other adverse effects, either directly or indirectly.

b) Finding: The project will not have impacts that are individually limited, but cumulatively considerable. ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects). *Less than significant impact.*

Discussion: Most of the impacts resulting from this project are related to short-term construction impacts. Therefore, other construction projects occurring at the same time as this Stormwater Improvement Project could have cumulative impacts related to traffic, noise, runoff and erosion, and air quality. Short-term construction impacts rarely rise to the level of significant under CEQA, and construction impacts are usually mitigatable, as is the case with this project. However, there could be several large construction projects occurring during the summer of 2020, including the Stormwater Improvement Project, the Van Wycke Bicycle and Pedestrian Connectivity Project and a parking lot improvement project (also related to infiltrating stormwater) that Trinidad Rancheria has planned for the Harbor area.

The exact construction schedule is unknown at this time, but it is unlikely that these projects would all be constructed at the same time. The City Engineer will be coordinating the City projects and is also coordinating with the Trinidad Rancheria. It is tentatively planned that the Rancheria will complete their project prior to the City starting its stormwater project in order to minimize potential conflicts. The primary construction portion of the Van Wycke project is the retaining wall, which is not going to impact the same areas as the stormwater projects. In addition, this project may not be implemented until 2021. The mitigation measures for a traffic control plan, noise control measures and erosion control BMPs will ensure that temporary traffic impacts are less than significant. There is no indication that there will be significant cumulative, short-term construction impacts.

The primary cumulative impacts of concern for this project, which will increase the amount of stormwater infiltrating into the ground, are fluctuating groundwater levels, which could have negative impacts on slope stability and septic systems. The City was very conscious of this potential impact and has addressed and incorporated it into the planning and design of the project from very early stages. The 2012 Geotechnical Analysis and the 2013 Groundwater Model Technical Report were prepared in order to inform and evaluate the design of the ASBS Stormwater Improvement Project as part of Phase 1 of the project. In addition, a 2019 Groundwater Model Addendum for LID Zoning was prepared. While this study had a slightly different focus for a different project, it did evaluate the effectiveness and impacts on groundwater from Phase 1 of the stormwater project. It also evaluated potential build-out scenarios and evaluated how inputs to groundwater from septic systems, landscaping and stormwater infiltration could affect groundwater levels and slope stability.

These are highly technical and comprehensive reports, covering the entire Trinidad Plateau watershed, that provide a solid basis for determining the potential for cumulative impacts resulting from both phases of the ASBS Stormwater Improvement Project, as well as groundwater inputs from septic systems, landscaping, rainwater and small-scale stormwater infiltration projects, or Low Impact Development (LID). These reports, studies and models, which were peer-reviewed by other professionals, found that Phase 2 of the ASBS Stormwater Improvement Project is not going to contribute to increased groundwater levels that could impact septic systems or slope stability, even considering additional inputs from future build-out of the City.

The project's individual impacts would not add appreciably to any existing or foreseeable future significant cumulative impact, such as visual quality, historic resources, traffic impacts, or air quality degradation. Incremental impacts, if any, would be negligible and undetectable. Cumulative impacts to which this project would contribute would be mitigated to a less than significant level.

Based upon the project as proposed and mitigated, comments from reviewing agencies, and the project's conformance with applicable regulations, there is no evidence to indicate that the proposed project will have impacts that are individually limited but cumulatively significant.

c) Finding: The project will not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly. *Less than significant impact.*

Discussion: As discussed in Checklist Sections 3 (Air Quality), 5 (Geology and Soils), 7 (Greenhouse Gas Emissions), 8 (Hazards and Hazardous Materials), 9 (Hydrology and Water Quality), 10 (Land Use and Planning), 12 (Noise), 13 (Population and Housing), 14 (Public Services), 15 (Recreation), 16 (Transportation/Traffic), and 18 (Utilities and Service Systems) of this document, the project would not expose persons to significant impacts related to air quality, seismic or geologic hazards, greenhouse gas emissions, hazards or hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, transportation/traffic hazards, and the provision of utility services to people.

These impacts were identified to have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated. Therefore, the proposed project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly, based on the analysis contained in the Initial Study prepared for the project.

SOURCE/REFERENCE LIST: The following documents and their references were used in the preparation of this Initial Study. Entries denoted with a * are available for review at Trinidad City Hall.

Association of Environmental Professionals. 2007. *Alternative Approaches to Analyzing Greenhouse Gas Emissions and Global Climate Change in CEQA documents.* June 29, 2007. Available at : https://www.counties.org/sites/main/files/file-attachments/aep_global_climate_change_june_29_final1.pdf. Accessed 2/20/18.

Bay Area Air Quality Management District (BAAQMD). 2017. *California Environmental Quality Act Air Quality Guidelines*. May 2017. Available at: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed on 2/20/18.

California Air Resources Board. 2018. *Area Designation Maps – State and National*. 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 Department of Forestry and Fire Protection (CAL FIRE). 2008. Draft Fire Hazard Severity Zones in Local Responsibility Area, Humboldt. Available at: http://frap.fire.ca.gov/webdata/maps/humboldt/fhszl06_1_map.12.jpg. Accessed 3/15/18.

California Geological Survey (CGS). 2009. *Tsunami Inundation Map for Emergency Planning, Trinidad Quadrangle/Crannell Quadrangle.* Available at: http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/humboldt/Documents/Tsunami_Inundation_TrinidadCrannell_Quads_Humboldt.pdf. Accessed 3/5/18.

*Crawford & Associates. 2103. *Slope Stability Analyses, Trinidad Stormwater Improvement Project, Trinidad, California*. October 3, 2013.

Federal Highway Administration (FHWA). 2006. Construction Noise Handbook Final Report. FHWA-HEP-06-015. Available at: https://www.fhwa.dot.gov/Environment/noise/construction_noise/handbook/handbook00.cfm. Accessed 3/20/18.

*GHD. 2018. *USDA Rural Development Funding Application, Preliminary Engineering Report, City of Trinidad.* January 4, 2018.

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

*HydroGeoLogic, Inc. (HGL). 2013. *Trinidad Model Review*. September 5, 2013.

Governor's Office of Planning and Research (OPR). 2017. General Plan Guidelines: 2017 Update. Available at: http://opr.ca.gov/planning/general-plan/guidelines.html. Accessed 12/10/18.

Humboldt County. 2018. *Humboldt County Web GIS*. http://webgis.co.humboldt.ca.us/HCEGIS2.0/. Accessed 03/02/18.

North Coast Unified Air Quality Management District (NCUAQMD). 2018. *NCUAQMD Website – Air Quality.* http://www.ncuaqmd.org/index.php?page=air.quality. Accessed 04/16/18

Natural Resources Conservation Service (NRCS). 2018. *Web Soil Survey* and associated *Map Unit Descriptions.* https://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm Accessed 05/22/18.

*SHN. 2018. Biological Report: Area of Special Biological Significance, Stormwater Improvement Project, Trinidad, CA. November 2018.

*Streamline Planning Consultants. 2007. *(Trinidad General Plan Update) Background Report: Geologic and Seismic Characteristics of Trinidad, CA.* April 2007.

*Trinidad Regional Watershed Management Working Group (TRWMWG). 2008. *Trinidad-Westhaven Integrated Coastal Watershed Management Plan.* May 2008.

*William Rich and Associates (WRA). 2018. *Archaeological Survey Report for Phase 2 of the Trinidad Stormwater Improvement Project. City of Trinidad, Humboldt County, California.*

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

LIST OF FIGURES

Figure 1: Project Location
Figure 2: Project Vicinity
Figure 3: Area of Potential Effect
Figure 4: Zoning and Project Parcels

LIST OF ATTACHMENTS

Attachment A: Responses to Comments on the Draft IS/MND

Attachment 1: GHD. 2018. *Figure 5 of Appendix A of the Preliminary Engineering Report.* January 4, 2018

Attachment 2: USDA, Rural Development. 2018. *Finding of No Significant Impact, City of Trinidad ASBS Stormwater Improvement Project.* Signed March 15, 2019.

Attachment 3: 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 4: City of Trinidad. 2016. *City of Trinidad ASBS Compliance Plan, Final Version 1.3.* September 6, 2016.

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 into Areas of Special Biological Significance (ASBS)."* June 14, 2018.

Attachment 9: GHD. 2018. "Keep Existing Outfall Alternative." *Figure 3 of Appendix A of the Preliminary Engineering Report.* January 4, 2018

Attachment 10. NRCS. 2018. *Web Soil Survey Map.* Created May 22, 2018.

Attachment 11: 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 12: 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.

Attachment 13: Humboldt County. 2019. *Fire Severity Map, Humboldt County GIS.* Available at: http://webgis.co.humboldt.ca.us/HCEGIS2.0/. Accessed April 5, 2019.

Attachment 14: City of Trinidad. 2018. *Figure 6, Watersheds, Trinidad Draft General Plan.* August 2018.

Attachment 15: 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: City of Trinidad. 2018. *Figure 10, Recreation and Trails, Trinidad Draft General Plan*. September 2018.

MITIGATION MEASURES, MONITORING, AND REPORTING PROGRAM

Section 4 – Biological Resources	
Mitigation Measure 1 – Biological Resource Protection Measures. 1. If construction activities occur during the nesting season (February 1 – August 15), a nesting bird survey shall be conducted prior to removal of woody vegetation. 2. Disturbed areas along the project right-of-way will be re-seeded with native, locally sourced vegetation that is compatible with the local coastal environment.	
Timing for Implementation/Compliance:	During construction.
Person/Agency Responsible for Monitoring:	Contractor, City Manager, Qualified Professional.

Monitoring Frequency:	Plans reviewed once. During construction activities.
Evidence of Compliance:	Site inspections.

Section 5 – Cultural Resources	
Mitigation Measure 2 – Cultural Resource Protection Measures 1. A Monitoring Plan / NAGPRA Plan of Action shall be put in place prior to permit approval, thereby setting up a formal agreement between stakeholders regarding the plan for items discovered and excavated dirt removed during project construction. The plan will be developed with input from the NAHC, Yurok Tribe, Trinidad Rancheria, and the Tsurai Ancestral Society. 2. Any grading or earthwork activities within the project area shall be monitored by tribally appointed monitor(s). 3. Cultural resource monitors shall 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 will be delayed until an archaeologist, qualified to the Secretary of Interior Standards, has assessed the significance of the find. 4. The cultural resource monitor(s) shall be kept informed by the contractor of the ground disturbance schedule. Field notes shall be kept by the monitor(s) and a brief letter report of the monitoring effort filed with the Northwest Information Center.	
Timing for Implementation/Compliance:	At the time of CDP/DR application. During ground disturbing activities.
Person/Agency Responsible for Monitoring:	City Manager, Contractor, Tribal Representative, and Professional Archaeologist.
Monitoring Frequency:	Ongoing. During ground disturbing activities.
Evidence of Compliance:	CDP approval. Site inspections.

Section 6 – Geology and Soils
Mitigation Measure 3: Erosion Control. An erosion control plan will be included as part of the Grading Permit application. At a minimum the following erosion control actions shall be included in the plan and implemented by the construction contractor to prevent soil erosion and sedimentation during construction. Erosion and sediment control actions will be in effect and maintained by the contractor on a year-round basis until all disturbed areas are stabilized. • 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. • 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.

Timing for Implementation/Compliance:	At the time of CDP/Grading Permit application.
Person/Agency Responsible for Monitoring:	City Engineer, Contractor.
Monitoring Frequency:	Plans reviewed once. During construction activities.
Evidence of Compliance:	Issuance of CDP and Grading Permit and site inspections.

Section 9 – Hydrology and Water Quality	
Mitigation 4 – Construction Dewatering Protocol: Excavation and below grade work will be scheduled during summer/fall to coincide with the period of the lowest groundwater levels at the site and the timeframe with the least chance for rainfall. If groundwater is encountered, the contractor, in coordination with the City will evaluate options for dewatering management. If dewatering is necessary, one or more of the following management options shall be used by the construction contractor to protect water quality: • Reuse the water on-site for dust control, compaction, or irrigation, as appropriate. • Retain the water on-site in a grassy or porous area to allow infiltration/evaporation. • Discharge (by permit) to a sanitary sewer or storm drain (this option may require a temporary method to filter sediment-laden water prior to discharge). If discharge to a storm drain (i.e., surface waters) is the only feasible option, the project will comply with Water Board requirements for construction dewatering. Actions may include characterizing the discharge and receiving waters and developing a BMP Plan including filtering methods, monitoring and reporting requirements, and a description of the pump systems proposed to remove groundwater and maintain a dry work area.	
Timing for Implementation/Compliance:	At the time of CDP / grading permit application, and during construction.
Person/Agency Responsible for Monitoring:	City Engineer and Contractor.

Monitoring Frequency:	Plans reviewed once. During construction activities.
Evidence of Compliance:	Issuance of CDP/Grading Permit and site inspections.

Section 12 – Noise	
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 6:00 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. • 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.	
Timing for Implementation/Compliance:	At the time of CDP application and during construction.
Person/Agency Responsible for Monitoring:	City Manager, City Engineer and Contractor.
Monitoring Frequency:	Plans reviewed once. During construction activities.

Evidence of Compliance:	Issuance of CDP and site inspections.

Section 16 – Traffic	
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 the retaining wall 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.	
Timing for Implementation/Compliance:	Prior to construction.
Person/Agency Responsible for Monitoring:	City Engineer, City Manager and Contractor.
Monitoring Frequency:	Plans reviewed once. During construction activities.
Evidence of Compliance:	Issuance of construction contract and site inspections.

RESPONSE TO COMMENTS
Draft IS-MND
ASBS Stormwater Improvement Project

This Response to Comments document contains public and agency comments received during the public review period of the ASBS Stormwater Improvement Project (proposed project) Initial Study / Draft Mitigated Negative Declaration (IS-MND).

The Draft IS-MND was circulated for a 30-day public review period that began on May 1, 2019 and ended on May 31, 2019. The document was also sent to the State Clearinghouse for review by state agencies. A public hearing was held on May 15, 2019 to take public comments on the Draft IS-MND. The following letters and comments were received:

Comment	Name	Date Received
Written Comments from Individuals and Organizations		
NA	None Received	
Agency Comments		
NA	None Received	
Oral Comments at the May 15, 2019 Public Hearing		
A	Kathleen Lake	May 15, 2019
B	Cheryl Kelly	May 15, 2019
C	John Graves	May 15, 2019
D	Alan Grau	May 15, 2019
E	Leslie Farrar	May 15, 2019

A summary of the comment and the City's responses follow. The comments have been lettered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the letter assigned to the commenter, and then the number assigned to each issue. (Response A.1, for example, indicates that the response is for the first issue raised by commenter A.)

Any changes made to the text of the Draft IS-MND correcting information, data or intent, are noted in the Final IS-MND as "track changes" from the Draft IS-MND.

Comment A
From: Kathleen Lake
Date: May 15, 2019

Comment A.1: Is concerned about cumulative impacts, particularly groundwater, and thinks that an EIR should be required. She mentions both the Van Wycke Bicycle and Pedestrian Connectivity Project and the slide on Edwards Street.

Response A.1: The statement is very broad, and no evidence was provided that there would be cumulative impacts, or even what types of cumulative impacts are being referred to. The comment does not provide *"facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts"* that are required in order to constitute substantial evidence of an impact pursuant to CEQA (CEQA Guidelines §15384). However, there were several general comments made regarding cumulative impacts, and the draft IS/MND did not have a lot of discussion of potential cumulative impacts. Therefore, the following additional information is provided.

In an MND, the place cumulative impacts are addressed is in the "Mandatory Findings of Significance" section near the end of the document. CEQA Guidelines § 15065 states: *"A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur:… (3) The project has possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."*

Further discussion regarding the geotechnical and groundwater studies that were completed for this project have been added to the mandatory findings discussion (Item 21.b) in the IS/MND. That discussion focuses on short-term construction impacts and impacts to groundwater and slope stability, since those would be the primary issues of concern for this project.

The City does not currently have any proposed plans for how to address the slide near the previous site of the Memorial Lighthouse; it is not yet a project. And the slide does not create instability outside of its immediate vicinity. In addition, GHD's 2019 Groundwater Model Addendum specifically looked for a potential link between the slide and Phase 1 of the Stormwater Improvement Project. Therefore, there are no cumulative impacts between this Stormwater Improvement Project and the slide.

In terms of the Van Wycke project, there will be no potential long-term cumulative impacts. That project is designed to stabilize an existing slide and will not contribute to instability. In addition, based on the geotechnical and groundwater studies that were done for the Stormwater Improvement Project, this project will not contribute to slope instability either. Both projects could have cumulative impacts to cultural resources, but the impacts have been reduced to less than significant with mitigation for both projects. In general, the tribal entities are in support of the stormwater project in order to reduce

pollution in Trinidad Bay. One of the major concerns for the Van Wycke project is aesthetics, but the stormwater project will not have a considerable contribution to any cumulative aesthetic impacts, because most of the improvements are underground.

On the other hand, if construction of the Van Wycke project occurs at the same time as the stormwater project, there could be some cumulative short-term impacts. These primarily include traffic, noise, water quality and air quality. In addition, the Trinidad Rancheria is planning on constructing parking lot improvements (also related to stormwater improvements to protect the ASBS) in the summer of 2020, when the City's Stormwater Improvement Project is also scheduled to occur. Further discussion of this issue has been added to Item 21(b) of the IS/MND.

Comment A.2: The project is too large/out of scale.

Response A.2: The project is only as large as it has to be in order to infiltrate the stormwater and eliminate the discharge/outfall in accordance with the City's ASBS Compliance Plan. Other than some curbs and inlets, all the improvements will be underground. Therefore, the project won't affect the scale or character of the community. The comment does not address a potential environmental impact.

Comment A.3: Other alternatives should be considered.

Response A.3: Alternatives were considered for the project. Specific suggestions of alternatives were not provided as part of the comment. The City Council and other stakeholders have already decided that the most appropriate course of action is to eliminate the City's stormwater outfall. This is the primary objective of the project; there are also a number of secondary objectives as outlined in the CEQA document. Therefore, the only feasible alternatives that meet the project objectives are variations on the exact number, size and placement of the infiltration basins.

However, the Preliminary Engineering Report that was prepared by GHD for this project does evaluate an alternative that includes keeping the existing outfall. That preliminary analysis found that that alternative would not have cultural resource impacts, but upon further review, that would only be true if the improvements are located above-ground. The PER also evaluates the costs of the two primary alternatives. The preferred alternative (proposed project) has higher construction costs, but those costs are grant-funded. And the "keep existing outfall alternative" has significantly higher annual operating and maintenance costs ($80,400 v. $11,850), which would not be grant funded, therefore, it is significantly more expensive over the lifetime of the project. That report also notes the following: *"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 certain areas increased the potential for bluff erosion, interaction with existing leach fields, or impact to groundwater elevation, and were therefore deemed technically infeasible."

The idea of detaining and infiltrating stormwater was first identified as a high priority project in the Trinidad-Westhaven Integrated Coastal Watershed Management Plan (ICWMP), which was a comprehensive, multi-stakeholder planning effort; it was adopted by the City Council via Resolution 2008-15 in June 2008. Since then, the City has directed staff to pursue this project, approving various budget line items and grant applications in order to do so. The City has committed to this project, which has substantial environmental benefits, through its ASBS Compliance Plan. An IS/MND is not required to comprehensively evaluate alternatives, but a thorough consideration of alternatives has already occurred. No further alternatives analysis is necessary.

Comment B

From: Cheryl Kelly
Date: May 15, 2019

Comment B.1: Requests information on the timeline for this project compared to the Van Wycke Bicycle and Pedestrian Connectivity Project.

Response B.1: Currently, that project is planned for construction in the summer of 2020, or possibly 2021, but the exact schedule is not known at this time. Please also see Response A.1 and revised checklist item 21(b) (Mandatory Findings of Significance) in the IS/MND.

Comment B.2: Asked about stormwater drainage on Wagner Street.

Response B.2: Wagner Street is not currently connected to or contributing runoff to the City's storm drainage system. The ASBS Stormwater Improvement Project only includes improvements in areas that contribute runoff to the existing storm drainage system discharging to the outfall on Launcher Beach. Areas that are not currently connected to or contributing runoff to the system will not be altered by the project.

Comment B.3: Wonders how the project impacts stability.

Response B.3: Please see Response A.1.

Comment C

From: John Graves
Date: May 15, 2019

Comment C.1: Also concerned about cumulative impacts.

Response C.1: Please see Response A.1.

Comment D

From: Alan Grau
Date: May 15, 2019

Comment D.1: The scale of the project requires an EIR.

Response D.1: Although context can be a consideration in determining whether impacts are significant, the scale of the project, by itself, does not have anything to do with whether an EIR is required. An EIR is required if there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant impact on the environment (CEQA Guidelines §15064(a)(1)). Based on the IS/MND, the project will not have any significant impacts as mitigated. Also see Response A.2.

Comment D.2: Questions how the project was noticed.

Response D.2: Notice for the CEQA IS/MND was provided in accordance with CEQA Guidelines §15072 (Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration). Notices were posted at the Town Hall notice board, Murphy's Market and the Post Office as well as the County Clerk's office. Notice was also sent to property owners within 100 feet of project components and known interested parties (e.g. Tribes, local Coastal Commission office). In addition, notice was sent to the State Clearinghouse/Governor's Office of Planning and Research for distribution to State agencies.

In addition, the project went through the NEPA Environmental Assessment (EA) process with publications of the availability of the NEPA EA on November 7 and 14, 2018 and publication of the Finding of No Significant Impact on March 27, 2019 in the Mad River Union. The City Council has also discussed the project numerous times between 2016 and the present.

Comment E

From: Leslie Farrar
Date: February 20, 2019

Comment E.1: Although borings were done, the description is vague, and she is concerned about the western bluff. She wants more information regarding groundwater and geology.

Response E.1: Please see Response A.1 and revised Item 21(b) in the IS/MND.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

June 4, 2019

Becky Price-Hall
Trinidad, City of
PO Box 390
2019059011
Trinidad, CA 95570

Subject: ASBS Stormwater Improvement Project - Phase 2
SCH#: 2019059011

Dear Becky Price-Hall

The State Clearinghouse submitted the above named MND to selected state agencies for review. The review period closed on 6/3/2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act, https://ceqanet.opr.ca.gov/2019059011/2.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
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