

Nov 22 2021

Thompson, Brendan@Waterboards

STATE CLEARINGHOUSE

From: Thompson, Brendan@Waterboards
Sent: Monday, November 22, 2021 11:39 AM
To: robby@landlogistics.com; planningbuilding@co.humboldt.ca.us
Cc: Moore, Heaven@Waterboards; Filak, Jordan@Waterboards; State Clearinghouse
Subject: Regional Board Comments: SCH 2021100406, Rainbow Self-Storage NOI to Adopt a Neg Dec

Dear Mr. Thacker and Humboldt County,

Thank you for providing North Coast Regional Water Quality Control Board (Regional Water Board) staff the opportunity to comment on the County of Humboldt's [Notice of Intent to Adopt a Negative Declaration](#) (NOI) for the Rainbow Self-Storage Project (Project), which involves:

- Enlarging an existing structure with second story additions that will increase the total square footage of the structure from 30,816 square feet to 41,374 square feet;
- Constructing a 24,000 square foot, two-story self-storage unit; and
- Constructing a one-story, 6,500 square foot self-storage unit.

We offer the following Project comments related to post-construction stormwater management requirements.

The County of Humboldt is a permittee under [State Water Resources Control Board Water Quality Order No. 2013-0001-DWQ, Waste Discharge Requirements for Storm Water Discharges From Small Municipal Separate Storm Sewer Systems](#) (MS4) (Stormwater Permit). The Stormwater Permit includes post-construction stormwater management program requirements to control pollutants from new and redeveloped projects within the County's MS4 boundary. Because the Project would create and/or replace 5,000 square feet or more of impervious surface, the Project must implement low impact development stormwater control measures to control the quality and volume of stormwater runoff from the Project site, as detailed in Stormwater Permit section E.12 (starting page 48).

The Project applicant proposes to address run-off from storm water via the installation of a 2,635 square foot gravel retention area. While we are pleased that the Project plans include a permanent stormwater control measure, the proposed BMP must be modified to meet the Stormwater Permit requirements. The Stormwater Permit requires that pollutants be controlled to a "maximum extent practicable" standard (Stormwater Permit requirement C.1, page 20). While retention basins may meet Stormwater Permit stormwater *volume* control requirements, the lack of vegetation and appropriate soil media would not meet the MEP standard for stormwater *treatment* requirements. The Project may meet the Stormwater Permit by converting the gravel retention basin area to a bioretention basin. The [Humboldt LID Manual](#) has guidance for properly sizing and designing a bioretention basin to meet the Stormwater Permit requirements.

Please note that if off-site stormwater drains into the Project area, the basin must be properly sized for the entire drainage area directed to the basin, not only the Project area draining to the basin.

Also, the County must ensure that the Project Applicant understands they are required to maintain the basin so that it remains functional for the life of the Project and that County staff may access the Project site at any time to verify the basin is appropriately maintained (Stormwater Permit requirement E.12.h, pages 59-60).

Thanks again for the opportunity to comment. We will forward the State Clearinghouse a PDF copy of this correspondence.

Brendan Thompson
Environmental Scientist
Municipal Stormwater Coordinator
North Coast Regional Water Quality Control Board
5550 Skylane Blvd. Ste. A
Santa Rosa, CA 95403-1072
(707) 407-0036