Trinidad Water Storage Tank and Pipeline Replacement Project

Public Circulation Initial Study & Proposed Mitigated Negative Declaration

City of Trinidad

January 20, 2023

→ The Power of Commitment

Public Circulation Initial Study & Proposed Mitigated Negative Declaration

Trinidad Water Storage Tank and Pipeline Replacement Project

Prepared for:

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1. Introduction

1.1 Purpose and Need

The Project addresses water loss and storage constraints exacerbated by drought and leaky pipelines within the City of Trinidad's (City) existing water utility infrastructure. The City serves treated water to approximately 1,000 people within the City service area. Currently, the City's water is pumped from Luffenholtz Creek to the treatment plant. From the treatment plant, water directly enters the City's storage and distribution system. That system includes storage tanks, conveyance pipes, valves, fire hydrants, and customer service meters. The system has been operated and maintained by the City since the early 1970s. The City's water delivery and storage system has served the City for close to 50 years, with components now nearing the end of their service life. The proposed Project for the City would update and replace aging infrastructure and provide resilience to a community's water system for drought, fire, and conservation.

The City's aging water pipes are primarily constructed of asbestos cement (AC). AC pipe becomes brittle and is prone to leaks as the pipe ages. A study on the flows conducted in 2019 showed that an average of 26% (over 18,000 gallons per day) of the pumped supply water was lost throughout the system. In addition to the water loss and vulnerable pipes, several sections of pipe are undersized limiting flows, specifically fire flows.

The City's water distribution system is sustained by two redwood water storage tanks that are located on the east side of Westhaven Drive near Lark Lane. When both tanks are filled to the maximum storage height of 18 ft, they store approximately 285,650 gallons of water. The tanks provide two main functions. The first function is to provide stored water to balance the variations in water demands by customers with the supply from the water treatment plant. The second function is to provide a free water surface at the appropriate elevation to maintain desired static pressure in the distribution system. Both tanks are connected to the distribution system and water flows back and forth between the tanks.

In addition to the aging AC pipes, the two redwood storage tanks are reaching the end of their service life with the one tank proposed for replacement as part of this Project needing replacement first due to corrosion of the exterior steel bands. The second tank is in slightly better shape and is estimated to need to be replaced in the next 5-10 years. The current storage tanks provide between one- and two-days' worth of water to meet regular demands without the treatment plant in operation and with the minimum fire flow demand requirements. Additional storage will be needed to meet water demands as climate change, and drought impact are expected to reduce flows in Luffenholtz Creek, resulting in a reduced intake flow rate to the treatment plant and storage tanks. Additional storage capacity helps provide more resiliency to the City's water system.

1.2 Project Location

The Project is located in Humboldt County within City and County jurisdiction (Appendix A – Figure 1). All Project elements located on Edwards Street and Van Wycke Street are located within City limits. The water storage tanks are also located within City limits. Project elements along Westhaven Drive and the access road to the water storage tanks are located within the County's jurisdiction.

The Project is entirely located within the Coastal Zone (Appendix A – Figure 2). Project elements located on Edwards Street and Van Wycke Street and the water tank site are under the jurisdiction of the City's Local Coastal Program and other City regulations. All other project elements are under the jurisdiction of the County's Local Coastal Program, the Trinidad Area Plan, and other regulations. Land uses in the immediate vicinity include public roadways, bordered primarily by residential uses. Natural resources and recreation are also common in the community of Trinidad.

2. Project Information

Project Title	Trinidad Water Storage Tank and Pipeline Replacement Project
Lead Agency Name & Address	The City of Trinidad P.O. Box 390 Trinidad, CA 95570
Contact Person & Phone Number	Eli Naffah, City Manager 707-677-3876 citymanager@trinidad.ca.gov
Project Location	Trinidad, CA
General Plan Land Use Designation	City of Trinidad Right of Way Humboldt County Right of Way RR: Rural Residential
Zoning	City of Trinidad Right of Way Humboldt County Right of Way PR: Public and Religious RA: Rural Residential Agriculture

2.1 CEQA Requirements

This Project is subject to the requirements of the California Environmental Quality Act (CEQA). The lead agency is the City of Trinidad (City). The purpose of this Initial Study is to analyze potential environmental impacts and provide a basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration, or a Negative Declaration. This Initial Study is intended to satisfy the requirements of CEQA (Public Resources Code [PRC], Div 13, Sec 21000-21177), and the State CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387). CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts.

Section 15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

1. A description of the project including the location of the project;
2. An identification of the environmental setting;
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;
4. A discussion of the ways to mitigate the significant effects identified, if any;
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls; and
6. The name of the person or persons who prepared or participated in the Initial Study.

2.2 Project Description

2.2.1 Project Elements

Project elements are located within the City limits, including at the existing water storage tank location, and outside of City Limits along Westhaven Drive (Appendix A – Figure 3-1 through Figure 3-3).

Improvements on Edward and Van Wycke Streets

The segment of vulnerable undersized AC pipe on Edwards Street would be replaced due to the possibility of ongoing leaks or a catastrophic failure. The area served by the Edwards Street water main is also served by a temporary line on Van Wycke Street (Appendix A – Figure 3-1). Bluff instability is the presumed driver for the failure of a six-inch water supply line serving Van Wyke Street. Water distribution through this line is currently being provided by a temporary, above-ground high-density polyethylene (HDPE) bypass pipe. Permanent repair or replacement of service to this broken line is an immediate need.

The Project would install a new eight-inch water line to replace the Edwards Street mainline from Hector Street to Galindo Street. The new eight-inch Edwards St water mainline would have valves at the line junctions to support operational flexibility and maintenance. The new Edwards Street line would include the replacement of the now undersized four-inch AC water line serving Edwards Street between Van Wyke and Hector Street. The Project includes the replacement of the existing, aged pressure regulating valve (PRV) on Edwards Street west of Hector Street and replacing the old AC line with a new six-inch line to a new fire hydrant on Van Wyke Street.

The water pipes are located under the roadway and roadway margins, within the public right of way. Replacement of the water pipe and associated PRVs would require pavement removal and replacement.

Improvements to Water Supply Main

The Project would replace approximately 6,400 feet of eight-inch water line along Westhaven Drive, between the water treatment plant and the water storage tanks. Additionally, this section would have dual lines (to/from) added for the distribution system (Appendix A – Figure 3-2). The distribution piping would include approximately 1,500 feet of ten-inch distribution line and 5,250 feet of six-inch distribution lines. The existing piping is predominantly located under Westhaven Road. Some segments of existing piping are located under the unpaved shoulders of Westhaven Road, within the public road right-of-way. Replacement would require pavement removal and replacements, as well as trenching within the unpaved shoulders. All new piping would be located under the repaved roadway.

Access Road to Water Storage Tanks

The Project includes an existing unpaved access road connecting the water storage tanks to Westhaven Drive (Appendix A – Figure 3-3). The access road is bordered by redwood trees and other vegetation. Access for construction and ongoing maintenance would require removal of some smaller redwood trees from the immediate margins of the access road to allow for egress and ingress of large equipment. The access road would remain unpaved; however, the road would be improved by increasing the radii of the tight turns within existing right-of-way to allow placement of the new pipeline in the roadway and placing additional aggregate over the road with adequate compaction. A small damaged 12-inch existing culvert located at the beginning of the access road would also be replaced with a 12 to 18-inch culvert.

Water Storage Tank Replacement

The City's water distribution system is fed by two redwood water storage tanks that are located on the east side of Westhaven Drive near Lark Lane (Appendix A – Figure 3-3). When both tanks are filled to the maximum storage height of 18 feet, they store approximately 285,650 gallons of water. The water volume stored within the tanks is intended to balance the variations in water demands by customers with the supply from the water treatment plant. The tanks also provide a free water surface at the appropriate elevation to maintain desired static pressure in the distribution system. Both tanks are connected to the distribution system and water flows back and forth between the tanks and the distribution piping.

The current storage tanks provide between one- and two-days' worth of water to meet regular demands without the treatment plant in operation and with the minimal fire flow demand requirements. Additional storage will be needed to meet water demands as dry flows in Luffenholtz Creek are expected to reduce the intake flow rate to the treatment plant as climate change intensifies. The tanks are reaching the end of their service life and will need to be replaced in the next five to ten years. The Project would replace one of the approximately 150,000-gallon redwood tanks with a

new 300,000-gallon steel tank. Replacing one of the 150,000-gallon tanks with a new 300,000-gallon tank would minimize the environmental footprint, removing the need for new property purchases or easements, generate resiliency, and reduce long term maintenance costs. The site layout design for the new 300,000-gallon tank would accommodate the replacement of the second 150,000-gallon tank in the future. A new retaining wall may be necessary around a portion of the new tank to accommodate the new tank and access road around the tank.

A chlorination booster system would be required as part of replacing the water storage tank. A chlorination booster system would be needed to meet the drinking water standards of Title 22 Code of Regulations. Power supply for the booster pump and associated telemetry system would be included as part of the water storage tank replacement, and the existing power to the site would be assessed as part of the design.

2.2.2 Project Construction

Construction would ideally occur within a single construction season, commencing in the summer of 2023 and conclude by December 2023. If feasible, vegetation clearing outside of the nesting bird season would occur first, by March 15. Construction would require approximately nine months, likely commencing in June. Construction may extend into 2024 if necessary.

Construction Activities and Equipment

All construction activities would be accompanied by both temporary and permanent erosion and sediment control reduction, including but not limited to silt fencing, fiber rolls, and post-construction seeding and mulch in disturbed areas. Project construction would include the following activities:

- Mobilization of equipment and materials to the site including setting up staging areas
- Clearing, grubbing, and tree removal – To clear the access road and other work areas
- Access road improvements by placing additional base aggregate and replacing a 12-inch culvert
- Demolition of existing water tank and demolition and removal of existing water lines that are being replaced
- Grading/Excavation – Throughout the Project Area to remove existing pavement and achieve grade and dimensions to the new water line and ancillary features
- Trenching – To install new water line and ancillary features
- Construction of new tank foundation and 300,000-gallon steel tank
- Upgrades to electrical system for new chlorine booster station.
- New telemetry system
- Paving - Along public roadways, following water line replacement where located within the roadway
- Demobilization of equipment and materials from the site including cleaning up and restoring staging areas

Equipment required for construction could include concrete trucks, concrete pump trucks, all terrain forklifts, snooper truck, compressors, tracked excavators, backhoes, graders, dump trucks, horizontal direction drilling, skid steers, bobcats, and pick-up trucks. Jackhammers, saws, grinders, or similar pieces of equipment may be necessary to support pavement removal. It is not anticipated that any temporary utility extensions, such as electric power or water, would be required for construction. Water from legal sources would be used for dust control and compaction and re-vegetation.

Construction Access

The Project Area would be accessed via US 101, Westhaven Drive, and City streets. No new access roads would need to be constructed in order to implement the Project.

Stockpiling and Staging

Within City limits, access and staging areas would be located in existing developed, upland areas, including a portion of the Murphy's Market parking lot or the undeveloped lot behind the market. Along Westhaven Drive, construction access and staging would be limited to the Westhaven Drive public right of way and existing pullouts. The City's property at the water treatment plant and water storage tanks would also be used for staging purposes. Within the stockpiling and staging area, Best Management Practices (BMPs) would be utilized to prevent construction materials and hazardous materials from impacting the environment.

Excess soils, aggregate road base, and construction materials would be stored on site within designated stockpiling and staging areas. Excess materials may be re-used on site for backfill and finished grading. Excess materials would not be stockpiled on-site once the Project is complete. The contractor would haul additional excess materials off site for beneficial re-use, recycling, or legal disposal. Off-site spoiling would be limited if it were to be required.

Establish Exclusion Areas and Erosion Control

Except for areas that would be unavoidably impacted during construction, identified resource areas to be protected would be excluded with protective fencing or signage prior to construction. Erosion control would also be installed prior to precipitation, e.g., silt fencing or fiber rolls (See EPA 1, Mitigation Measure BIO-6).

Vegetation Removal

To minimize potential impacts to nesting birds, vegetation could be removed prior to March 15 or after August 15 to avoid the nesting bird season, if feasible. If vegetation removal cannot be confined to work outside of the nesting season, a qualified biologist would conduct pre-construction surveys within the vicinity of the Project Area, to check for nesting activity of native and migratory birds and to evaluate the site for presence of raptors and special-status bird species. If active nests were detected within the construction footprint or within the construction buffer established by the Project biologist, the biologist would flag a buffer around each nest (See Mitigation Measure BIO 3).

Grading and Fill

Grading would need to occur at the tank site, and along Westhaven Drive in sections of the pipe replacement along road shoulders to achieve site subtility. Similarly, fill would be placed and compacted at the tank site and in the pipe trenches.

Utility Relocation

While no utility relocations are planned, some minor utility relocations may occur if there are utility conflicts along the water line replacement alignment.

Traffic and Access Control

Temporary lane closures on Edward Street, Van Wycke Street, and Westhaven Drive would be required. Temporary lane closures would follow City and County requirements for temporary roadway closures, including signage, public noticing, and compliance with the California Manual on Uniform Traffic Control Devices (CA MUTCD) requirements.

Road Repaving and Striping

Following replacement of the water piping, the public roadways would be repaved and restriped as needed. Striping and signage would comply with the California Manual on Uniform Traffic Control Devices (CA MUTCD) requirements.

Groundwater Dewatering

Groundwater dewatering is generally not expected to be required. However, if needed, temporary groundwater dewatering would involve pumping water out of a trench or excavation. Groundwater would typically be pumped to a

settling pond, Baker tanks (or other similar type of settling tank), or into a dewatering bag. Dewatering water may also be percolated back into the ground (in uplands). Discharge to regulated waters would not occur.

2.2.3 Operation and Maintenance

Following construction, water system infrastructure would be maintained and operated by the City. The Project has been designed to minimize long-term operational and repair costs.

2.3 Regulatory Permits, CEQA, and NEPA

The City is the CEQA lead agency for the Project. An Initial Study/Proposed Mitigated Negative Declaration is the proposed CEQA pathway.

Project activities would require coverage under a Coastal Development Permit. The Project is located in the Local Coastal Program jurisdiction of the City and County. Thus, Coastal Development Permits would be required from both the Humboldt County Planning Department and the City of Trinidad. Portions of the Project Area are in the appeal jurisdiction of the Coastal Zone and thus appealable to the California Coastal Commission.

A grading permit would be required from the City per Section 15.16.040 of the City of Trinidad Municipal Code.

A wetland delineation has been completed for the Project (Appendix E). The Project has been determined to impact three-parameter wetlands, so permits from the U.S. Army Corps of Engineering (USACE) under Section 404 of the Clean Water Act (CWA), and a corresponding Water Quality Certification from the North Coast Regional Water Quality Control Board (Region Board) Under Section 401 of the CWA would be required. Impact analysis specific to one- and three-parameter wetlands can be found in the Biological Resources section (5.4) of this CEQA IS/MND prepared for the Project.

The Project does not involve any waterways or riparian habitat; thus, a Lake and Streambed Alteration Agreement from the California Department of Fish and Wildlife would not be required. Similarly, the Project is not expected to require consultation with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service/NOAA Fisheries, as potential impacts to federal special status plants, fish, or wildlife species are not anticipated, pending the outcome of seasonally appropriate pre-construction rare plant surveys.

3. Other Requirements and Considerations

3.1 Environmental Protection Actions Incorporated into the Project

The following actions are included as part of the Project to reduce or avoid potential adverse effects that could result from construction or operation of the Project. Mitigation measures are presented in the following analysis in Section 5 – Environmental Analysis. Environmental protection actions and mitigation measures, together, would be included in a Mitigation Monitoring and Reporting Program at the time that the Project is considered for approval.

3.1.1 Environmental Protection Action 1 – Stormwater Pollution Prevention Plan (SWPPP)

The Project will obtain coverage under State Water Resources Control Board (Water Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. The City will submit permit registration documents (notice of intent, risk assessment, site maps, SWPPP, annual fee, and certifications) to the Water Board. The SWPPP will address pollutant sources, best

management practices, and other requirements specified in the Order. The SWPPP will include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling, and analysis, and ensuring overall compliance.

3.2 Mitigation, Monitoring, and Reporting Program

The Mitigation, Monitoring, and Reporting Program (MMRP) for this Initial Study/Mitigated Negative Declaration (ISMND) is included in Appendix B. The MMRP includes a summary of all mitigation measures and how each mitigation measure would be implemented to ensure all potential impacts associated with the Project would result in a less than significant environmental impact.

3.3 Tribal Consultation

On November 2, 2022, letters were sent from the City of Trinidad to the Cher-Ae-Heights Indian Community of the Trinidad Rancheria, the Yurok Tribe, and the Tsurai Ancestral Society to begin consultation under Section 106 of the National Historic Preservation Act. These letters provided notification to the tribes about the Project. No response has been received as of December 23, 2023.

4. 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	☐ Greenhouse Gas Emissions	☐ Public Services
☐ Agricultural & Forestry Resources	☐ Hazards & Hazardous Materials	☐ Recreation
☒ Air Quality	☐ Hydrology/Water Quality	☒ Transportation
☒ Energy	☐ Land Use/Planning	☐ Tribal Cultural Resources
☒ Biological Resources	☐ Mineral Resources	☐ Utilities/Service Systems
☒ Cultural Resources	☐ Noise	☐ Wildfire
☒ Geology/Soils	☐ Population/Housing	☒ Mandatory Findings of Significance

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there would 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 would be prepared.

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

☐ I find that the proposed project MAY have a “potentially 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 the proposed project MAY have a “potentially 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 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.

Eli Naffah

Eli Naffah, City Manager

1-23-23

Date

5. Environmental Analysis

5.1 Aesthetics

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
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) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with 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

Views within the Project Area are limited to paved roads, roadside vegetation, and a private water tank area; additionally, the Project Area within the City of Trinidad is considered to have exceptional scenic quality due to the coastal views.

a) Have a substantial adverse effect on a scenic vista? (No Impact)

A scenic vista can generally be defined as a view that has remarkable scenery or a broad or outstanding view of the natural landscape. The City of Trinidad General Plan identifies Edwards Street as the most scenic area in the community due to coastal views. The Trinidad Area Plan identifies scenic vistas from Moonstone Beach to Patrick's Point.

The Project would include replacement of the water pipes within these areas and will require pavement removal and replacement. The Trinidad General Plan and Trinidad Area Plan make no aesthetic restrictions on short term construction related visual impacts. Operationally, the Project within the scenic vistas would be underground, therefore not impacting any scenic vista. The only Project element that would be above ground would be the water storage tanks outside of the scenic area described in the plans above and would not be visible from any scenic vista due to existing vegetation screens. No impact would result.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? (No Impact)

According to the California Scenic Highway Mapping System, there are no designated State, or Federal, scenic highways, or byways, in the Project vicinity. The segment of US 101 adjacent to the Project Area is eligible for a State scenic highway designation. There are no structures or historic buildings in the Project Area, and there are also no rock outcroppings. Due to existing vegetation screens, and the fact that the Project would be primarily underground, no Project elements would be visible from the eligible State scenic highway US 101. No impact would result.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public Views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? (No Impact)

The proposed Project would be located in an existing public right of way and would be primarily underground. The Project does not include any tall visual elements that would block or screen public views. The new water tank is not visible from public roads, trails, or recreation areas. Proposed actions would not conflict with zoning and other regulations governing scenic quality within the City of Trinidad or the Trinidad Area Local Plan. No impact would result.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? (No Impact)

There is currently existing lighting in the Project Area within the City of Trinidad in the form of streetlights and lighting from residential buildings, and within the Community of Westhaven lighting exists from residential buildings. The Project does not include any new streetlights or other lighting elements. Night-time construction would not occur. No proposed Project elements would cause substantial new sources of glare. No impact would result.

5.2 Agriculture and Forest Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				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)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				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 conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

The Project is located within the City of Trinidad, as well as along the Humboldt County jurisdiction of Westhaven Drive. There are no agricultural or forestry land uses within the Project Area (City of Trinidad 2008, Humboldt County 2022a, Humboldt County 2022b). The tank site is located adjunct to lands designated for timber and agricultural uses.

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland)? (No Impact)

As of the date of this ISMND, the Department of Conservation (DOC)'s Farmland Mapping and Monitoring Program has not been completed for Humboldt County. Therefore, lands within the Project Area have not been formally analyzed by the DOC to determine if they meet the criteria for being designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

For this analysis, "Agricultural Soils" and "Prime Agricultural Soils" designations via the Humboldt County WebGIS online mapping tool were utilized, which utilizes soils data from the Natural Resources Conservation Service (NRCS). According to the Humboldt County WebGIS, the Project Area includes 223—Megwil and Cannonball soils, 0 to 5 percent slopes with a classification of Prime farmland if irrigated (Appendix F of Appendix E – Wetland Delineation). The potentially Prime farmland if irrigated is located along a paved road and is not irrigated. The Project would not remove agricultural land from production or result in a change in land use, as there is no such land presently under agricultural use within the Project Area. No impact would result.

b) Conflict with Agricultural Zoning or Williamson Act Contract? (No Impact)

There are no agricultural zoning or active Williamson Act contracts within the Project Area (City of Trinidad 2008, Humboldt County 2022a, Humboldt County 2022b). Zoning within the Project Area is discussed in Section 5.11 (Land Use and Planning). Therefore, construction and operation of the Project would have no effect on agricultural zoning or Williamson Act contracts because none exist within the Project Area. And the project has no potential to impact nearby agricultural land. No impact would result.

c,d) Conflict with Forest Land Zoning or Convert Forest Land? (No Impact)

There are no forest lands, timberland, or land zoned Timberland Production Zone or Commercial Timberland in the Project Area (City of Trinidad 2008, Humboldt County 2022a, Humboldt County 2022b), but the tank site is located adjacent to land designated for commercial timber uses. The Project would require the removal of saplings along the maintenance road to allow Project elements access to the water tank Project Area. These trees are not forest resources; therefore, no forest land or timberland would be converted to non-forest or non-timberland use. Zoning within the Project Area is discussed in Section 5.11 (Land Use and Planning). No impact would result.

e) Convert Farmland or Forest? (No Impact)

The Project would include the removal of saplings; however, the trees that would be removed are along a maintenance road, with a land use and zoning of residential, and are not considered a forest resource. Potential biological impacts associated with tree removal are discussed in Section 5.4 (Biological Resources). There are no other changes in the existing environment caused by the Project that would impact farmland or forest land in or adjacent to the Project Area. No impact would result.

5.3 Air Quality

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?		X		
b) Result in a cumulatively considerable net increase in 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) adversely affecting a substantial number of people?			X	

The Project is located within the Humboldt County-portion of the North Coast Air Basin (Air Basin) which is managed by the North Coast Unified Air Quality Management District (NCUAQMD). The NCUAQMD monitors air quality, enforces local, State, and federal air quality regulations for counties within its jurisdiction, inventories and assesses the health risks of Toxic Air Contaminants (TACs), and adopts rules that limit pollution.

For construction emissions, the NCUAQMD has indicated that emissions are not considered regionally significant for projects whose construction would be relatively short in duration, lasting less than one year. For Project construction lasting more than one year or involving above average construction intensity in volume of equipment or area disturbed, construction emissions may be compared to the stationary source thresholds (NCUAQMD 2019). Construction is expected to require approximately 180 working days to complete and would begin in summer 2023. Emissions related to construction were calculated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 and are discussed below (also see Appendix C – CalEEMod Modeling Information and Results).

a) Conflict with or obstruct implementation of the applicable air quality plan? (Less Than Significant with Mitigation)

This impact relates to consistency with an adopted attainment plan. The NCUAQMD is responsible for monitoring and enforcing local, State, and federal air quality standards. Humboldt County is designated 'attainment' for all National Ambient Air Quality Standards. With regard to the California Ambient Air Quality Standards, Humboldt County is designated attainment for all pollutants except PM_{10}. Humboldt County is designated as "non-attainment" for the State's PM_{10} standard.

PM_{10} refers to inhalable particulate matter with an aerodynamic diameter of less than 10 microns. PM_{10} includes emission of small particles that consist of dry solid fragments, droplets of water, or solid cores with liquid coatings. The particles vary in shape, size, and composition. PM_{10} emissions include unpaved road dust, smoke from wood stoves, construction dust, open burning of vegetation, and airborne salts and other particulate matter naturally generated by ocean surf. Therefore, any use or activity that generates airborne particulate matter may be of concern to the NCUAQMD. The proposed Project would create PM_{10} emissions in part through vehicles coming and going to the Project Area and the construction activity associated with the Project.

To address non-attainment for PM_{10}, the NCUAQMD adopted a Particulate Matter Attainment Plan in 1995. This plan presents available information about the nature and causes of PM_{10} standard exceedances and identifies cost-effective control measures to reduce PM_{10} emissions to levels necessary to meet California Ambient Air Quality Standards. However, the NCUAQMD states that the plan, "should be used cautiously as it is not a document that is

required in order for the District to come into attainment for the state standard" (NCUAQMD 2022). Therefore, compliance with applicable NCUAQMD PM_{10} rules is applied as the threshold of significance for the purposes of analysis. NCUAQMD Rule 104 Section D, Fugitive Dust Emissions, is applicable to the Project.

Rule 104, Section D – Fugitive Dust Emissions is used by the NCUAQMD to address non-attainment for PM_{10}. Pursuant to Rule 104 Section D, the handling, transporting, or open storage of materials in such a manner, which allows or may allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne, including, but not limited to covering open bodied trucks when used for transporting materials likely to give rise to airborne dust and the use of water during the grading of roads or the clearing of land. During earth moving activities, fugitive dust (PM_{10}) would be generated. The amount of dust generated at any given time would be highly variable and is dependent on the size of the area disturbed at any given time, amount of activity, soil conditions, and meteorological conditions. Unless controlled, fugitive dust emissions during construction of the shared use pathway could be a potentially significant impact, therefore, Mitigation Measure AQ-1 would be incorporated to comply with NCUAQMD's Rule 104 Section D.

Operation of the Project would not include the handling, transporting, or open storage of materials in which particulate matter may become airborne. Due to the absence of handling, transport, or open storage of materials that would generate particulate matter, operation of the Project is not expected to conflict with NCUAQMD's Rule 104 Section D. No impact from operation of the Project would result.

Mitigation

Implementation of Mitigation Measures AQ-1 would reduce the potential impact related to PM_{10} fugitive dust by requiring BMPs.

Mitigation Measure AQ-1: Measures to Reduce Air Pollution

The contractor shall implement the following measures during construction; the measures shall be included as notes on final construction plans:

- Equipment and activity must not emit dust that is visible crossing the property line.
- All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered two times per day in areas of active construction or as necessary. The County or NCUAQMD may require additional treatment in periods of high wind or other circumstances causing visible dust to be generated by the construction site.
- All haul trucks transporting soil, sand, or other loose material off-site shall be adequately wetted and / or covered as necessary.
- Measures to reduce off-site tracking of mud and dirt shall be required. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day, as necessary. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.
- All roadways to be repaved shall be completed as soon as possible. Facility foundations shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.

- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The NCUAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

With implementation of Mitigation Measure AQ-1, the Project would not conflict with applicable air plans. This impact would be reduced to a less-than-significant level with mitigation.

b) Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (Less Than Significant)

This impact is related to regional criteria pollutant impacts. As identified in Section 5.3 a), Humboldt County is designated nonattainment of the State's PM_{10} standard. The County is designated attainment for all other State and federal standards. Potential impacts of concern will be exceedances of State or federal standards for PM_{10}. Localized PM10 is of concern during construction because of the potential to emit fugitive dust during earth-disturbing activities.

Construction

Localized PM_{10}

The Project would include clearing and grubbing, grading, and paving activity. Generally, the most substantial air pollutant emissions would be dust generated from site clearing and grubbing, and grading. If uncontrolled, these emissions could lead to both health and nuisance impacts. Construction activities would also temporarily generate emissions of equipment exhaust and other air contaminants. The Project's potential impacts from equipment exhaust are assessed separately below.

The NCUAQMD does not have formally adopted thresholds of significance for fugitive, dust-related particulate matter emissions above and beyond Rule 104, Section D which does not provide quantitative standards. For the purposes of analysis, this document uses the Bay Area Air Quality Management District (BAAQMD) approach to determining significance for fugitive dust emissions from Project construction. The BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. If all appropriate emissions control measures recommended by BAAQMD are implemented for a project, then fugitive dust emissions during construction are not considered significant. BAAQMD recommends a specific set of "Basic Construction Measures" to reduce emissions of construction generated PM10 to less than significant. Without incorporation of these Basic Construction Measures, the Project's construction-generated fugitive PM_{10} (dust) would result in a potentially significant impact.

The Basic Construction Measure controls recommended by the BAAQMD are incorporated into Mitigation Measure AQ-1. These controls are consistent with NCUAQMD Rule 104 Section D, Fugitive Dust Emission and provide supplemental, additional control of fugitive dust emissions beyond that which would occur with Rule 104 Section D compliance alone. Therefore, with incorporation of Mitigation Measure AQ-1, the Project would result in a less than significant impact for construction-period PM_{10} generation and would not violate or substantially contribute to an existing or projected air quality violation.

Construction Criteria Pollutants

For construction emissions, the NCUAQMD has indicated that emissions are not considered regionally significant for projects whose construction would be of relatively short duration, lasting less than one year. For project construction lasting more than one year or that involves above average construction intensity in volume of equipment or area disturbed, construction emissions may be compared to the stationary source thresholds.

The NCUAQMD does not have established CEQA significance criteria to determine the significance of impacts that would result from projects such as the proposed Project; however, the NCUAQMD does have criteria pollutant significance thresholds for new or modified stationary source projects proposed within the NCUAQMD's jurisdiction. NCUAQMD has indicated that it is appropriate for lead agencies to compare proposed construction emissions that last more than one year to its stationary source significance thresholds, which are:

– Nitrogen Oxides – 40 tons per year
– Reactive Organic Gases – 40 tons per year
– PM_{10} – 15 tons per year
– Carbon Monoxide – 100 tons per year.

If an individual project's emission of a particular criteria pollutant is within the thresholds outlined above, the project's effects concerning that pollutant are considered to be less than significant.

CalEEMod version 2020.4.0 was used to estimate air pollutant emissions from Project construction (Appendix C). Construction of the Project is expected to begin in 2023 and require approximately 180 working days to complete. Detailed construction equipment activity and material hauling volumes were provided by the Project's Design Team.

Table 5.3-1 summarizes construction-related emissions for the Project. As shown in Table 5.3-1, the Project's construction emissions are far below the NCUAQMD's stationary sources emission thresholds. Therefore, the Project's construction emissions are considered to have a less than significant impact.

Table 5.3-1 Construction Regional Pollutant Emissions

Parameter	Emissions (tons per year)			
	ROG	NOx	CO	PM10
Project Construction (2023)	<0.1	0.8	1.0	<0.1
NCUAQMD Stationary Source Thresholds	40	40	100	15
Significant Impact?	No	No	No	No

Operation

Following construction, the Project would not include any stationary sources of air emissions. The proposed booster pump for the chlorination booster system would be electric-driven and not result in onsite combustion emissions.

Vehicle trips associated with operation and maintenance of the facilities would include periodic inspections and repairs as needed. Operation and maintenance of the Project would generate only infrequent trips and is not anticipated to generate trips above existing conditions. The Project would not result in substantial long-term operational emissions of criteria air pollutants. Therefore, Project-generated operational emissions would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment. The Project's contribution to a cumulative impact would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations? (Less Than Significant)

Activities occurring near sensitive receptors should receive a higher level of preventative planning. Sensitive receptors include school-aged children (schools, daycare, playgrounds), the elderly (retirement community, nursing homes), the infirm (medical facilities/offices), and those who exercise outdoors regularly (public and private exercise facilities, parks). Sensitive receptors adjacent to the Project Area include existing residences, including several residences within 50 feet of the Project's proposed alignment on Edwards and Van Wycke Street, and along Westhaven Drive. Trinidad School and Trinidad tennis courts are also located less than ¼ mile from the Edwards Street portion of the project, and there are several nearby trails.

Construction

Project construction activities would occur over approximately 180 working days. Project construction is not expected to include intensive or prolonged construction equipment use for a long duration. Additionally, equipment use would be spread out over a linear project alignment, further reducing the duration of equipment use near individual receptor locations. Due to the short duration (no one area of prolonged or intense construction activity), the Project would not result in the exposure of sensitive receptors to substantial pollutant concentrations. Therefore, the potential construction-related impact would be less than significant.

Project demolition could result in exposure of construction workers to Asbestos Containing Material (ACM) that may be present in the existing facilities. Project structures for removal include the existing Asbestos Concrete (AC) pipe. During construction asbestos abatement would be conducted, as necessary, to remove existing ACM from existing structures. Appropriate notifications would be made to the NCUAQMD in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) requirements for ACM prior to the commencement of asbestos abatement and/or construction work at the Project site. NESHAP are a series of pollutant-specific regulations which are designed to minimize the public's exposure to hazardous chemicals through the use of specific types of control equipment and the implementation of various control methods or procedures. The NCUAQMD has been delegated by the EPA to enforce NESHAP for the Project Area and administers all of the NESHAP regulations including the sections applicable to the demolition and renovation of structures that utilized ACM in their construction. The Asbestos NESHAP requires owners and operators to provide written notification of regulated demolition and renovation activities. A licensed abatement contractor would be engaged to conduct abatement work in accordance with specifications. Therefore, implementation of regulatory requirements would ensure that potential impacts from exposure to ACM during demolition would be less than significant.

Operation

Following construction, the Project would not include any stationary sources of air emissions or new mobile source emissions that would result in substantial long-term operational emissions of criteria air pollutants. Therefore, Project operation would not expose nearby sensitive receptors to substantial levels of pollutants. The potential operation-related impact would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Less Than Significant)

The Project would create limited exhaust fumes from gas- and diesel-powered equipment during construction. The likelihood of these odors and emissions reaching nearby receptors is influenced by atmospheric conditions, specifically wind direction. Due to the relative short-term nature of construction, distribution of activities, emissions or odors caused by construction, the Project would not adversely affect a substantial amount of people. Therefore, a less than significant impact would result

Following construction, operation of the Project would not result in any major sources of odor or emissions above existing conditions. Therefore, there would be a less than significant potential impact from Project operations.

5.4 Biological Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?		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

A Biological Resources Report (BRR) and Wetland Delineation were prepared to assess baseline environmental conditions within the Project Area, and are included as Appendix D and E, respectively. These studies evaluated the potential for any special status plants, wildlife species, or any sensitive natural communities (SNCs) or aquatic resources to occur. Under Section 7 of the ESA, critical habitat should be evaluated if designated for federally listed species that may be present in the Biological Study Area (BSA). The BSA, or the area directly or indirectly impacted by the proposed Project, encompasses a 0.25-mile radius around the Project Area.

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service? (Less Than Significant with Mitigation)

Special-status Plant Species

Special status plant species under State jurisdiction include those listed as endangered, threatened, or as candidate species by the California Department of Fish and Wildlife (CDFW) under the California Endangered Species Act (CESA). Plant species on CNPS California Rare Plant Ranking (CRPR) Lists 1A, 1B and 2A and 2B are considered eligible for state listing as endangered or threatened pursuant to the California Fish and Game Code and CDFW has oversite of these special status plant species as a trustee agency. As part of the CEQA process, such species should be considered as they meet the definition of Threatened or Endangered under Sections 2062 and 2067 of the California Fish and Game Code. There are occasions where CRPR List 3 or 4 species might be considered of special

concern particularly for the type locality of a plant, for populations at the periphery of a species range, or in areas where the taxon is especially uncommon or has sustained heavy losses, or from populations exhibiting unusual morphology.

Based on database searches, historical records, and an overview of the primary literature, seven special status species had a moderate potential of occurring in the Project Area. Oregon coast paintbrush (*Castilleja litoralis*) has a CRPR of 2B.2; harlequin lotus (*Hosackia gracilis*) has a CRPR of 4.2; running-pine (*Lycopodium clavatum*) has a CRPR of 4.1; maple-leaved checkerbloom (*Sidalcea malachroides*) has a CRPR of 4.2; Siskyou checkerbloom (*Sidalcea malviflora ssp. patula*) has a CRPR of 1B.2; California globe mallow (*Iliamna latibracteata*) has a CRPR of 1B.2; and woodnymph (*Moneses uniflora*) has a CRPR of 2B.2. Forty additional special status species were thought to have a low likelihood of occurring within the Project Area (Appendix D)

GHD conducted one survey for special status plant species on November 3, 2022. No special status plant species were detected; however, this survey was outside of the blooming season for a majority of special status plant species with potential to occur in the Project Area. Given that floristic plant surveys were not completed, the impact on potential special status plants is considered potentially significant.

Mitigation

Avoidance and minimization measures, including a pre-construction survey, for special status plant species are addressed collectively for all species. Implementation of Mitigation Measure BIO-1 would be incorporated into the Project to reduce impacts on special status plant species.

Mitigation Measure BIO-1: Pre-Construction Survey Avoidance and Minimization Measures to Protect Special Status Plants

- Seasonally appropriate pre-construction surveys for special status plant species shall occur prior to construction within the planned area of disturbance for the Project, during the appropriate blooming times (April and June). Survey methods shall comply with CDFW rare plant survey protocols and shall be performed by a qualified field botanist. Any populations of special status plant species that are detected shall be mapped.
- The locations of any special status plant populations to be avoided shall be clearly identified in the field and surrounded by highly visible exclusion fencing and/or flagging.
- A pre-construction worker training will occur within seven days prior to the start of construction and detail any areas where special status plant populations have been identified for protection within the limits of construction, staging, and stockpiling.

The implementation of Mitigation Measure BIO-1 would reduce the impact of the Project on special status plant species by requiring pre-construction surveys by qualified biologists prior to work to less than significant levels.

Special Status Mammals

A reconnaissance-level wildlife site visit was conducted on October 17, 2022, and no special status mammal species were observed. However, the BRR identified three special status species with a moderate potential to occur within the BSA. Special status bat species that have the potential to be present at or near the Project Area include the Silver-haired Bat (*Lasionycteris noctivagans*). The BSA provides suitable roosting habitat for foliage and tree roosting bats (will roost in woodpecker holes, under loose bark, and basal hollows as well as other cavities). Vegetation removal will be limited to minor roadside vegetation and may include minor mowing and minor brush removal.

Special status terrestrial mammals that have a moderate potential to occur within the BSA include the White-footed Vole (*Arborimus albipes*) and the Fisher (*Pekania pennanti*). Construction of the Project could impact special-status terrestrial mammal and bat species through the removal or modification of vegetation or structures and due to ground disturbance. This impact is considered potentially significant.

Mitigation

The White-footed Vole (CDFW SSC), Silver-haired Bat (CDFW SAL), and Fisher (CDFW SSC) have a moderate potential to occur based on detections or habitat quality within and around the BSA. Implementation of Mitigation Measure BIO-2 would be incorporated into the Project to reduce impacts on special status mammal species.

Mitigation Measure BIO-2: Avoidance and Minimization Measures to Protect Special Status Mammals

- Potential locations for denning, roosting, and nesting will be inspected within the PSB and BSA within a week of construction commencing. Varying for species, this includes hollowed-out trees, snags, and under rocks and logs within the BSA.
- All trees planned for removal will be marked and a qualified biologist will inspect them for signs of the species' inhabitance within a week of removal.
- If a den, roost, or nest is located, a no-work buffer will be determined based on the species.
- A pre-construction worker training will occur within seven days prior to the start of construction and address identification and protection of special status mammals.

The implementation of Mitigation Measure BIO-2 would reduce the impact of the Project on special status mammal species by requiring pre-construction surveys by qualified biologists prior to work to less than significant levels.

Special Status and Migratory Birds

A reconnaissance-level wildlife site visit was conducted on October 17, 2022, and one special status bird species (California Brown Pelican; *Pelecanus occidentalis*) was observed flying over the BSA. Additionally, the BRR identified three bird species: Marbled Murrelet (*Brachyramphus marmoratus*), Bald Eagle (*Haliaeetus leucocephalus*), and Bank Swallow (*Riparia riparia*) that are federally-listed, state-listed, or both, and have a moderate potential to occur based on recent detections in proximity to the BSA. These listed species are unlikely to forage or nest within the BSA. The Project would not adversely affect these species, and consultation under Section 7 of the ESA would therefore not be required. However, twelve other special status bird species have a moderate to high potential to occur.

In addition, migratory and nesting birds are protected by the Migratory Bird Treaty Act and Fish and Game Code. If state special status and/or native migratory birds are nesting in the PSB, or up to 500 feet during construction activities, these species may be impacted by removal of nesting habitat, elevated levels of noise, and anthropogenic disturbance. This impact is considered potentially significant.

Mitigation

To protect nesting special status birds, as well as native migratory bird species that are nesting, implementation of Mitigation Measure BIO-3 would be incorporated into the Project to reduce impacts.

Mitigation Measure BIO-3: Avoidance and Minimization Measures to Protect Special Status and Nesting Birds

- Ground disturbance and vegetation clearing would be conducted, if possible, during the fall and/or winter months and outside of the avian nesting season (which is generally assumed to occur between March 15 – August 15) to avoid any direct effects to special-status and protected birds.
- If ground disturbance or vegetation clearing cannot be confined to the fall and/or winter outside of the nesting season, a qualified biologist would conduct pre-construction surveys within the vicinity of the PSB, to check for nesting activity of native birds and to evaluate the site for presence of raptors and special status bird species. The biologist would conduct at minimum a one-day pre-construction survey within the seven-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance and vegetation removal work lapses for seven days or longer during the nesting season, a

qualified biologist would conduct a supplemental avian pre-construction survey before Project work is reinitiated.

- If active nests are detected within the construction footprint, or within 500 feet of construction activities, the biologist would flag a buffer around each nest. Construction activities would avoid nest sites until the biologist determines that the young have fledged, or nesting activity has ceased. If nests are documented outside of the construction (disturbance) footprint, but within up to 500 feet of the construction area, buffers would be implemented as needed. In general, the buffer size for common species would be determined on a case-by-case basis in consultation with the CDFW and, if applicable, with USFWS. Buffer sizes would take into account factors such as (1) noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; (2) distance and amount of vegetation or other screening between the construction site and the nest; and (3) sensitivity of individual nesting species and behaviors of the nesting birds.
- If active nests are detected during the survey, the qualified biologist would monitor all nests at least once per week to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified biologist, disturb nesting activities (e.g., excessive noise), would be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified biologist would immediately implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing speed limits, replacing and updating noisy equipment, queuing trucks to distribute idling noise, locating vehicle access points and loading and shipping facilities away from noise-sensitive receptors, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise-sensitive receptors.
- A pre-construction worker training will occur within seven days prior to the start of construction and address identification and protection of special status and nesting birds.

The implementation of Mitigation Measure BIO-3 would reduce the impact of the Project on special status and nesting bird species to less than significant levels.

Special-status Amphibian and Reptile Species

A reconnaissance-level wildlife site visit was conducted on October 17, 2022, and no special status amphibians or reptiles were observed. However, the BRR identified four special status amphibians with a moderate or high potential to occur within the BSA. The Pacific Tailed Frog (*Ascaphus truei*), Del Norte Salamander (*Plethodon elongatus*), Northern Red-legged Frog (*Rana aurora*), and Southern Torrent Salamander (*Rhyacotriton variegatus*) have a moderate to high potential to occur based on recorded occurrences or the presence of suitable habitat within or nearby the BSA. Additionally, the perennial Deadman's Creek that flows through a culvert underneath the PSB on Westhaven Drive is described as amphibian-bearing in a Nonindustrial Timber Management Plan (Appendix D). Thus, this impact is considered potentially significant.

Mitigation

Implementation of Mitigation Measure BIO-4 would be incorporated into the Project to reduce impacts on special status amphibian species.

Mitigation Measure BIO-4: Avoidance and Minimization Measures to Protect Special Status Amphibians

- A qualified biologist would perform a pre-construction survey for the amphibian species within seven days prior to commencement of ground disturbance. The survey shall be limited to the PSB and within 100 feet of suitable habitat. Suitable habitat would be determined by the qualified biologist. The biologist would relocate any specimens that occur within the work-impact zone to nearby suitable habitat.
- In the event that a special status amphibian is observed in an active construction zone, the contractor would halt construction activities in the area and the frog and/or salamander would be moved by a qualified biologist to a safe location in similar habitat outside of the construction zone.
- Work crews will inspect open trenches, pits, and under construction equipment and material left onsite in the morning and evening to look for amphibians that may have become trapped or are seeking refuge.
- A pre-construction worker training will occur within seven days prior to the start of construction and address identification and protection of special amphibians.

The implementation of Mitigation Measure BIO-4 would reduce the impact of the Project on special status amphibian species by requiring pre-construction surveys by qualified biologists prior to work to less than significant levels.

Special Status Fish

A reconnaissance-level wildlife site visit was conducted on October 17, 2022, and no special status fish species were observed. However, the BRR identified two special status fish species, Western Brook Lamprey (*Lampetra richardsoni*) and Coast Cutthroat Trout (*Oncorhynchus clarkii clarkii*) have a moderate potential to occur within Deadman's Creek, which crosses under Westhaven Drive and the BSA. Additionally, there is designated Chinook (*Oncorhynchus tshawytscha*) and Coho (*Oncorhynchus kisutch*) Salmon Essential Fish Habitat (EFH) within the BSA, and the Pacific Fisheries Management Council Salmon Fisheries Management Plan encompasses these species. Deadman's Creek is not currently mapped as containing special status or listed fish species (Appendix D). No in-water work or modification to the culvert that directs Deadman's Creek under Westhaven Drive is proposed and no tree removal is planned in this area, however proximity of construction could still potentially impact special status fish and EFH. With the incorporation of EPA 1 and Mitigation Measure BIO-6 below, the impact would be less than significant.

Special Status Invertebrates

A reconnaissance-level wildlife site visit was conducted on October 17, 2022, and no special status invertebrate species were observed. In addition, the BRR identified no species with a moderate or high potential to occur within the BSA, and seven species with a low potential. Therefore, a less than significant impact would occur.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service? (Less Than Significant with Mitigation)

Three SNCs were identified in the BRR to be within the Project Area (Appendix D). Red alder forest – salal association (*Alnus rubra / Gaultheria shallon*), Redwood forest and woodland, and Salal – berry brambles – California blackberry association (*Gaultheria shallon – Rubus* [*ursinus*]).

Red Alder Forest

Small stands of Red alder forest are present surrounding the existing water tanks, along Westhaven Drive and on the slope below Van Wycke Street. Red alder forest is defined by more than 50% cover of red alder in the tree layer with co-dominants including grand fir (*Abies grandis*), Sitka spruce, Douglas fir, redwood, and/or hemlock (*Tsuga heterophylla*) as co-dominants in the tree canopy. In the area of Deadman's Creek, the Red alder forest is associated with salal in the understory. This combination has not been ranked by the State yet but is considered sensitive by CDFW and may also be considered an ESHA in the Coastal Zone (Appendix D). In the water tank area and on the slope below Van Wycke Street, the Red alder forest does not have an association with salal and is therefore not considered sensitive and would not be considered an ESHA.

Redwood Forest and Woodland (S3)

The majority of the PSB on and around Westhaven Drive is in second growth Redwood forest and woodland with four possible associations: red alder / salmonberry, Douglas fir / salal, Douglas fir / huckleberry, and swordfern. The Redwood forest and woodland alliance was not mapped on the association level since the alliance and all associations are considered sensitive and all may be also considered ESHAs in the Coastal Zone. The Redwood forest alliance with red alder / salmonberry association intergrades with the Red alder alliance in the PSB.

Salal – Berry Brambles (S4)

There is a stand of the Salal-berry brambles alliance with a California blackberry association present on the slope below Van Wycke Street in the City of Trinidad. This association is characterized by having salal or California blackberry dominant in the shrub canopy. When California blackberry is the only dominant species, the association is considered sensitive by CDFW and may also be considered an ESHA in the Coastal Zone.

Riparian Habitat

There is one section of Red alder forest near the center of the PSB on Westhaven Drive that is also riparian habitat regulated by the CDFE, NCRWQCB, and the CCC. This stand of alder is approximately 80 feet wide and occurs on either side of Deadman's Creek, which flows through a culvert underneath Westhaven Drive. According to the definition of "riparian corridor" in the Trinidad Area Plan, this riparian area includes an additional 100 feet on either side beyond the dripline of the riparian vegetation and is approximately 280 feet wide.

Red alder trees overhang the PSB on the road shoulder; however, no tree removal is planned in this area and no impacts are expected to the riparian corridor. Some berry brambles may be removed south of Van Wycke Street, but would be expected to revegetate naturally, resulting in temporary impacts. The Project requires the clearing of approximately 0.5 acres of Red alder woodland and some redwood trees surrounding the water tanks up to a distance of 80 feet. Although these areas were mapped as SNCs, it was noted during the field survey that numerous young trees (defined as less than six inches diameter at breast height [dbh]) were present in the areas mapped as SNCs. In a natural setting, not all of the saplings would survive due to crowding and competition. Therefore, only removal of trees considered an SNC with a dbh greater than six inches is considered a significant impact due to the habitat and ecological loss such tree removal would cause. The following mitigation measure is proposed to offset impacts to SNC habitat.

Mitigation

Implementation of Mitigation Measure BIO-5 would be incorporated into the Project to reduce impacts on Sensitive Natural Communities.

Mitigation Measure BIO-5: Avoidance and Offset to Protect Sensitive Natural Communities

Construction within mapped Sensitive Natural Communities shall be avoided to the greatest extent practicable. If impacts are unavoidable, mitigation will occur at a minimum ratio of 1:1. A Mitigation and Monitoring Plan shall be prepared in coordination with State resource agencies. Onsite locations for wetland mitigation shall be prioritized. If suitable locations for onsite mitigation is not sufficiently available, offsite mitigation shall occur.

The Plan shall be acceptable to State agencies with jurisdiction and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; monitoring schedule; and remedial measures. The ratio and conditions of mitigation will be negotiated in consultation with the City and State resource agencies with jurisdiction over sensitive natural communities. The Plan shall be implemented by the City.

With incorporation of Mitigation Measure BIO-5, impacts to SNC habitat would be avoided or offset through replacement plantings in the vicinity of the impact. This potential impact would be less than significant with mitigation.

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? (Less Than Significant with Mitigation)

The wetland delineation (Appendix E) determined the extent of wetlands within the Project Area based on hydrophytic vegetation, hydric soils, and wetland hydrology using methods and indicators outlined in the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region. Since the Project falls within the Coastal Zone, potential three-parameter and one-parameter wetlands were documented.

Three one-parameter wetland palustrine emergent ditches (W1, W2, and W5) were observed with a total area of 3,875 ft2 (0.09 acre) within the Project Area. Two wetlands (W3 and W4) qualified as three-parameter palustrine emergent ditches with a total area of 2,230 ft2 (0.05 acre). W3 is 1,265 ft2 and is regulated by the NCRWQCB, and W4 is 965 ft2 and regulated by both the NCRWQCB and the USACE.

The existing water piping is predominantly located under Westhaven Road; however, some segments of existing piping are located under the unpaved shoulders of Westhaven Road, within the public road right-of-way. Replacement would require pavement removal and replacement and would impact these wetland ditches. No permanent impacts to wetlands are expected, however temporary impacts would occur due to Project construction. This impact is potentially significant.

Mitigation

Implementation of Mitigation Measure BIO-6 would be incorporated into the Project to reduce impacts on wetlands.

Mitigation Measure BIO-6: Avoidance and Minimization Measures to Protect Adjacent Wetlands

- The City shall attempt to avoid or minimize impacts to wetlands/waters to the greatest extent feasible in the final design plans.
- Adjacent wetlands shall be clearly identified in the construction documents and reviewed by the City prior to issuing for bid to ensure they are clearly marked as equipment exclusion zones during construction.
- Suitable perimeter control measures, such as silt fences, or straw wattles shall be placed below all construction activities at the edge of surface water features to intercept sediment before it reaches the waterway. These measures shall be installed prior to any clearing or grading activities.
- Temporarily impacted ditches will be rebuilt in kind following the close of construction.

With incorporation of Mitigation Measure BIO-6 impacts to wetlands would be avoided or through restoration following the Project. This potential impact would be less than significant with mitigation.

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? (No Impact)

Project construction and operations do not include in-water work or any other activity that might impede fish migration. A small damaged 12-inch existing culvert located at the beginning of the water tank access road would be replaced, however this is not a fish-bearing waterway (Appendix D). Terrestrial Project construction and operations do not include construction of any barriers to wildlife migration (e.g., fencing, highly developed roadway, or large structures). No impact would result.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Less Than Significant)

The PSB is entirely within the California Coastal Zone. The portion of the PSB in the area of Edwards and Van Wycke Street and the water tanks are in the jurisdiction of the City of Trinidad LCP. The City of Trinidad's General Plan

(1978) is the Land Use Plan for the City's LCP, and the Implementation Plan consists of the zoning, grading, building and subdivision ordinances.

The portion of the PSB in the Westhaven Drive area and the access road to the water tanks is in the jurisdiction of the Humboldt County LCP. The Trinidad Area Plan (2014) is the Land Use Plan for this area, and the Humboldt County Zoning Code is the Implementation Plan.

City of Trinidad General Plan

– Policy 16 - Rare Plant Protection: The Humboldt County Natural Resources Department should define the geographical limits of the three rare plants located within potential development areas. Vegetation removal, timber harvesting, or development should be reviewed to ensure that all reasonable means have been considered to protect any existing rare plants.

Trinidad Area Plan

– 3.30 B - Natural Resource Identification and Development Policies: Identification of Environmentally Sensitive Habitats

a. Environmentally sensitive habitats within the County Trinidad Planning Area shall include:

(1) Rivers, creeks and associated riparian habitats

(2) Offshore rocks, islands and intertidal areas

(3) Other critical habitats for rare or endangered species listed on state or federal lists

(4) Wetlands. No wetlands are currently identified.

- Proposed development occurring within areas containing these sensitive habitats, shall be subject to conditions and requirements of this chapter. Should an area proposed for development appear, upon examination of the maps to be within or contain the indicated habitat, but upon field inspection is found not to contain the indicated habitat, then the development is exempt from requirements of the section. As an interim measure for habitat areas not currently identified on the maps, information obtained during the CEQA review process will be used by the County in reviewing applications for coastal development permits. The review of these sensitive habitat areas and the identification of appropriate land uses and/or mitigation measures shall be in cooperation with the Department of Fish and Game. The County shall review requests to amend the Environmentally Sensitive Habitat maps in terms of the entire plan proposal and supporting policies. Accommodation of new resource information on the Environmentally Sensitive Habitat Maps may also require amendments to the certified land use plan and zoning.

b. Wetland areas shall be identified according to the Coastal Act's definition of wetlands.

c. Where there is dispute over the boundary or location of an environmentally sensitive habitat, the following information may be requested of the applicant:

(1) a base map delineating topographic lines and adjacent roads

(2) vegetation map

(3) soils map

- Review of this information shall be in cooperation with the Department of Fish and Game and the County's determination shall be based upon specific factual findings as to whether an area is or is not an environmentally sensitive habitat area based on the criteria and definitions above.

Humboldt County General Plan and Regulations

The Humboldt County General Plan does not apply inside the Coastal Zone; however, it can act as a guide.

The Open Space and Conservation Element of the Humboldt County General Plan (2017) summarizes policies germane to the protection of biological resources. Applicable policies include:

– BR-P1: Wetland Identification,

- BR-S10 – Development Standards for Wetlands: Policy BR-S10 established that development standards for wetlands shall be consistent with the standards for Streamside Management Areas (SMA). The SMA width applied to wetlands is designated as 50 feet for seasonal wetlands and 150 feet for perennial wetlands. The setback begins at the edge of the delineated wetland.
- BR-S11: Wetlands Defined.
- 313-64: Vegetation Removal, Major. The purpose of these provisions is to: (1) preserve and protect major vegetation within the County Coastal Zone that directly and indirectly prevents soil erosion, landslide and flood hazard; (2) reduce runoff, provide windbreaks or provide protection to adjacent trees from irreparable wind damage; and (3) protect property values and the local economy by maintaining the visual quality of the County, while respecting and recognizing individual rights to develop, maintain, and enjoy private property to the fullest possible extent.

Through regulation 313-64 Humboldt County regulates removal of major vegetation within a coastal zone. However, Section 64.1.3.2 includes exemptions for projects with a Coastal Development Permit, which the Project will acquire (see Section 2.3), therefore 313-64 does not apply. Humboldt County does regulate tree removal for trees larger than 12 inches in diameter that are in residential zones through a Special Permit. As the Project would occur within the Coastal Zone, this Humboldt County's tree removal policy does not apply.

Policy 16 of the City of Trinidad General Plan requires that all vegetation removal, timber harvesting, or development should be reviewed to ensure no impacts to existing rare plants, and with Mitigation Measure BIO-1, this would not be significant. The Project would obtain any necessary resource agency permits and would avoid and/or compensate for any impacts to wetlands and waters to ensure that no net loss occurs through Mitigation Measure BIO-6. No conflicts with policies or ordinances protecting biological resources have been identified. The Project does not conflict with the biological policies in the Trinidad Area Plan. Therefore, the impact would be less than significant.

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? (No Impact)

There are no adopted Habitat Conservation, Community Conservation, or approval local, regional, or state habitat conservation plans that apply to the Project Area (Appendix D). No impact would result.

5.5 Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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 formal cemeteries?		X		

The cultural resources study area is described as the Area of Potential Effect (APE). A Cultural Resources Investigation Report (CRI) was prepared for the Project by Archaeological Research and Supply Company (ARSC 2022). The studies assessed the potential for surficial and/or buried archaeological and historical resources in the proposed improvement area through the completion of the following:

– Records and literature search at the Northwest Information Center (NWIC) of the California Historical Resources Information Center (CHRIS);
– Further literature review of publications, files, and maps for ethnographic, historic-era, and prehistoric resources and background information;
– Communication with the Native American Heritage Commission (NAHC) to request a review of the Sacred Lands File and contact information for the appropriate tribal communities;
– Contact with the appropriate local Native American Tribes; and
– Pedestrian survey of the Project Area.

Study results were used as a technical basis for evaluating potential impacts to historic and archeological resources under CEQA.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? (No Impact)

A Cultural Resources Investigation Report was completed in December 2022 (ARSC 2022). Three previous surveys were conducted within the APE, and 28 previous surveys were conducted outside of the Project APE but within the 1/4-mile buffer area. For the purposes of this section, a historical resource is a resource listed in, or determined to be eligible for listing in the California Register of Historical Resources. Historical resources included in a local register of historical resources, as defined in subsection (k) of Section 5020.1 [see below], are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register or historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1 [see below] shall not preclude a lead agency from determining whether the resource may be a historical resource for purposes of this section. Cal. Pub. Res. Code Sections 5020.1 and 5024.1 provide the following definitions:

– Historic district means a definable unified geographic entity that possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.
– Historical landmark means any historical resource that is registered as a state historical landmark pursuant to Section 5021.

– Historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic agricultural, educational, social, political, military, or cultural annals of California.
– Local register of historic resources means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.
– Substantial adverse change means demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired. CEQA requires a lead agency to identify and examine environmental effects that may result in significant adverse effects.

Based on the surveys done by ARSC in the CRI, there are no historic resources, properties or structures identified within the Project APE. Thus, no impact would result.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? (Less Than Significant Impact with Mitigation)

A Cultural Resources Investigation Report was completed in December 2022 (ARSC 2022). No archaeological resources were located during this survey. Three previous surveys were conducted within the APE, and 28 previous surveys were conducted outside of the Project APE but within the 1/4-mile buffer area. There were no archaeological resources located during the survey conducted in the CRI. The Project Area is predominantly paved over with areas of overgrown roadside ditches between paved roads and residential lots. The visibility is significantly hampered by this contemporary infrastructure and thick vegetation, resulting in a low confidence that field work to date has precluded the possibility for impacting significant archaeological resources during project implementation.

Within the CRI, a request for information from ARSC to the Bear River Band of Rohnerville Rancheria, Big Lagoon Rancheria Blue Lake Rancheria, Cher-Ae-Heights Indian Community of the Trinidad Rancheria, and the Wiyot Tribe resulted in no comments regarding known archaeological or cultural resources in the Project Area. The Trinidad area is the location of significant prehistoric and historic activities with known archaeological resources, both historic and prehistoric, identified within the general vicinity of the Project Area. Therefore, due to a ground disturbance for pipe installation of a maximum 10 feet in depth, the potential to impact an unknown archaeological resource is potentially significant. As recommended in the CRI from the tribal communication, mitigation measures have been incorporated into the Project specific to cultural resources. To ensure potential impacts to cultural resources remain less than significant, Mitigation Measure CR-1 and CR-2 would be implemented to establish protocols recommended in the Cultural Resources Investigation.

Mitigation

Implementation of Mitigation Measure CR-1 and CR-2 would reduce the potential impact to archaeological resources by requiring procedures that follow tribal consultation, and what shall occur in the event of inadvertent discovery.

Mitigation Measure CR-1: Cultural Monitor

- Qualified cultural monitors will be hired by the contractor prior to construction.
- Cultural monitors must be onsite during grading and earthwork activities. Cultural monitors are to include both a tribally trained monitor and a Bachelor of Arts or higher level archaeologist, with field-school training in historical archaeology or two years of experience in historical archaeology.
- 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.
- The Cultural Resource Monitor must be kept informed by the contractor and understand the ground disturbance schedule. Field notes should be kept by the Cultural Resource Monitor and a brief letter report of the monitoring effort filed with the North Coastal Information Center. The Cultural Resource Monitor need only be present during ground disturbing activities.

Mitigation Measure CR-2: Inadvertent Discovery of Archaeological Material

If cultural materials for example: chipped or ground stone, historic debris, building foundations, or bone are discovered during ground-disturbance activities, work shall be stopped within 66 feet of the discovery, per the requirements of CEQA (Revised Guidelines, Title 14 CCR 15064.5 (f)). Work near the archaeological finds shall not resume until a professional archaeologist, who meets the Secretary of the Interior's Standards and Guidelines, has evaluated the materials, and offered recommendations for further action. Tribal representatives shall be notified.

With incorporation of Mitigation Measure CR-1 and CR-2, potential impacts within the APE would be reduced to a less than significant level through the production of the monitoring plan, monitoring during construction, and proper handling of potential archaeological resources that could be discovered.

c) Disturb any human remains, including those interred outside of formal cemeteries? (Less Than Significant Impact with Mitigation)

While the CRI did not determine archaeological resources were likely to be present within the APE, inadvertent discovery of human remains may still occur. In the event human remains are encountered during construction, Mitigation Measure CR-3 would be implemented to ensure any potential impact would be less than significant.

Mitigation

Implementation of Mitigation Measure CR-3 would reduce the potential impact to archaeological resources or human remains by requiring procedures that shall be taken in the event of inadvertent discovery.

Mitigation Measure CR-3: Inadvertent Discovery of Human Remains

If human remains are discovered during Project construction, work would stop at the discovery location, within 66 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (PRC, Section 7050.5). The Humboldt County Coroner would be contacted to determine if the cause of death must be investigated. If the Coroner determines that the remains are of Native American origin, it is necessary to comply with State laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (PRC, Section 5097). The Coroner would contact the NAHC. The descendants or most likely descendants of the deceased would be contacted, and work would not resume until they have made a recommendation to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in PRC, Section 5097.98.

Implementation of Mitigation Measure CR-3 would reduce the potential impacts to a less-than-significant level during construction because a plan would be implemented to address discovery of unanticipated human remains and to preserve and/or record those resources consistent with appropriate laws and requirements.

5.6 Energy Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impacts 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

a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation? (Less Than Significant with Mitigation)

Construction of the Project would involve a variety of earthwork and construction practices, involving the use of heavy equipment as discussed in Section 5.3 (Air Quality). Construction would require the use of fuels, primarily gas, diesel, and motor oil. Construction emissions were estimated using CalEEMod version 2020.4.0 and were estimated to be approximately 172 metric tons of carbon dioxide equivalent ($MTCO_2e$) from all construction activities (Appendix A). The Project's construction emissions equal 5.74 $MTCO_2e$ per year when annualized over the assumed 30-year lifespan of the Project. Construction equipment would remain staged in the Project Area once mobilized. Excess soils and construction materials would be stored on-site within previously designated staging areas only. Excess soils may be re-used on-site for backfill and finished grading. Excess soils would not remain stockpiled on-site once the Project is complete. The contractor may haul additional excess soils off-site for legal use at other permitted sites.

Inefficient construction-related operations would also be avoided due to the measures in Mitigation Measure AQ-1 (BMPs to Reduce Air Pollution). Equipment idling times would be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes or less (as required by Mitigation Measure AQ-1 and CARB ATCM regulations). Because construction would not encourage activities that would result in the use of large amounts of fuel and energy in a wasteful manner, and the incorporation of Mitigation Measure AQ-1 would reduce idling time, impacts related to the inefficient use of construction-related fuels would be less than significant with mitigation.

Operation of the Project would include periodic maintenance and inspections, consistent with existing conditions. The use of fossil-fuel powered equipment to support these operational and maintenance activities would be periodic and short-term (occurring intermittently). These activities would not result in a substantial increase in energy use, and would not result in inefficient, wasteful, or unnecessary consumption of fuels or other energy resources. Operation and maintenance of the Project would not generate additional vehicle trips above existing conditions. Operation would result in a minor increase in in energy use for the proposed booster pump; however, the pump is essential to the operation of the proposed facilities and would result in wasteful, inefficient, or unnecessary consumption of energy. The operation of the Project will not result in inefficient, wasteful, or unnecessary consumption of fuels or other energy resources. The Project's operational impact will be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (No Impact)

The Project would not conflict with or inhibit the implementation of the State Integrated Energy Policy Report (IEPR), Senate Bill (SB) SB 100, Renewable Portfolio Standard (RPS) or other relevant State regulations or plans. The Project would not inefficiently utilize energy due to incorporation of Mitigation Measure AIR-1, which limits idling time and provides measures to protect air quality. The Project would temporarily require the use of equipment in order to construct the components of the Project; however, these activities would be temporary and would not interfere with the broader energy goals of the State. Operationally, the Project would not generate an increase in vehicle trips above existing conditions. The Project would require a minor increase in operational electricity consumption for the proposed

booster pump; however, the booster pump is essential to the operation of the Project and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

The majority of California's energy-related plans are not directly applicable to the Project or its operations; however, the Project complies with those plan requirements that apply. The Project would therefore not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. No impact would result.

5.7 Geology and Soils

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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?		X		

The Project is located in the City of Trinidad and in the community of Westhaven in Humboldt County, California, on the Trinidad and Crannell USGS quadrangles (Appendix A – Figure 1). Two areas of construction are included in the Project. One Project Area is in the City of Trinidad along Edwards Street, Van Wycke Street, and Hector Street. The other Project Area is in the community of Westhaven along North Westhaven Drive and approximately 830 feet east to the water tank location.

Regional geology is influenced by seismic activity related to the Cascadia Subduction Zone (CSZ) and Mendocino Triple Junction (MTJ). The MTJ is a very seismically active region where the oceanic Gorda and Pacific Plates meet the continental North American Plate. South of the MTJ, seismic activity is predominantly related to the transverse fault motion of the San Andreas Fault Zone. North of the MTJ, seismic activity is predominantly related to subduction occurring along the CSZ. The Project is located approximately 60 miles north of the MTJ, within the southern extent of the CSZ. The CSZ is capable of producing magnitude 9 earthquakes (RCTWG 2022).

Local topography in the Trinidad and Westhaven areas is characterized by a series of uplifted marine terraces. These terraces give an appearance of stair-steps when viewed in cross section. Alluvial deposits have accumulated on the terrace surfaces and generally include sand, silt, and gravel. Much of the Trinidad and Westhaven area is underlain by Franciscan Complex bedrock, which is composed of sandstone, shale, conglomerate, greenstone, and chert, and is

often referred to as mélange because of its mixed composition. The Franciscan bedrock of the area is typically highly fractured, sheared, and erodible due to deformation caused by seismic uplift (Streamline 2007).

The Project is located near several Holocene faults that are a part of the Mad River Fault Zone. The Mad River Fault Zone is comprised of multiple fault segments, including the McKinleyville and Mad River Faults that are located south of the Project, and the Trinidad Fault, which is located in the immediate vicinity of the Project (CGS 2022).

The Project Area that is located in the City of Trinidad is predominantly comprised of Halfbluff-Tepona-Urban Land soils with two to nine percent slopes and Candymountain soils with thirty to seventy-five percent slopes. The Halfbluff-Tepona-Urban Land soils and the Candymountain soils are both generally classified as marine terraces with loam, fine sandy loam, or loamy sand (NRCS 2022a).

The Project Area that is located along Westhaven Drive is comprised of Halfbluff-Tepona-Urban land soils, Megwil and Cannonball soils, Lepoil-Espa-Candymountain complex soils, and Atwell-Ladybird complex soils. The Megwill and Cannon ball and Lepoil-Espa-Candymountain complex soils are generally classified as marine terraces with loam, clay loam, or sandy clay loam. The Atwell-Ladybird complex soils are generally classified as mountain slopes and earthflows comprised of silt loam, clay loam, or clay (NRCS 2022b).

a, a.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. (No Impact)

The Project Area located in the City of Trinidad is within the Trinidad USGS quadrangle and is shown as being immediately adjacent to the Trinidad Fault, which is one fault segment of the Mad River Fault Zone and is identified as an Alquist Priolo Fault (CGS 2022). The Project Area is located within approximately 150 feet of the nearest property parcel that is mapped as being within the earthquake fault zone, however the Project Area is not mapped as being within the earthquake fault zone. In this Project Area, construction activities would include replacing approximately 800 feet of water main along eastern Van Wycke and Edwards Street (from Hector to Galindo streets) and removing the existing temporary line. Construction activities include shallow excavation and pavement removal and replacement. These activities would have no impact on fault rupture.

The Project Area located along Westhaven Drive is within the Crannell USGS quadrangle and is shown as not being located within an Alquist Priolo Fault Zone. However, the Trinidad Fault is mapped as following the coastline west of the Project Area (CGS 2022). In this Project Area, construction activities would include removing and replacing approximately 6,400 feet of water supply main along Westhaven Drive, replacing a water storage tank, and the addition of valving, telemetry, and a new chlorine booster system. Construction activities for the water supply main replacement include shallow excavation and pavement removal and replacement. Construction activities related to the water tank replacement would include shallow excavation, tank foundation construction, grading, and potentially installation of a new retaining wall. It is also planned to make improvements to the existing access road, which would require some vegetation removal, shallow excavation, and grading. These surficial activities would have no impact on fault rupture.

a.ii) Strong seismic ground shaking? (Less Than Significant)

The Project is situated within a seismically active area close to several seismic sources capable of generating moderate to strong ground motions. Because the Project is located within a seismically active area, there is potential for strong ground shaking associated with large magnitude earthquakes to occur during the design life of the Project.

Under existing conditions, the Project Area that is located in the City of Trinidad is primarily utilized by vehicular traffic and does not contain residences (however, residences are located adjacent to the Project Area). In the event of an earthquake, the Project would not increase exposure to strong seismic ground shaking.

The Project Area that is located along Westhaven Drive is also primarily utilized by vehicular traffic and would not increase exposure to strong seismic ground shaking. The location of the water storage tanks is relatively remote with the nearest residence being approximately 500 feet west of the tank locations. This meets the California Building Code minimum distance requirement for a tank of its size (proposed 300,000 gallons) of 100 feet from any residential

structure. In addition, the tank and tank foundation would be constructed as to prevent the concentration of excessive loads on the tank at all points of support and would be designed to provide reasonable safety under imposed loadings (including earthquakes), as required by the California Building Code.

Given the Project would not increase the risk of strong seismic ground shaking and would be constructed to meet California Building Code earthquake resiliency standards, the impact to people and structures from strong seismic ground shaking would be less than significant.

a.iii, aiv, c, d) Liquefaction, landslides, or otherwise unstable soils? (Less Than Significant with Mitigation)

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 Northern Humboldt Seismic Safety Map produced by the Humboldt County Planning and Building Department (HCPBD) shows areas of potential liquefaction as well as areas of low to high soil instability. Neither the Project Area located in the City of Trinidad, nor the Project Area located along Westhaven Drive are mapped as being located within a liquefaction zone (HCPBD 2015). An impact related to liquefaction would therefore not result.

The Project Area located in the City of Trinidad is mapped as being located mostly near moderate instability slopes, however it is also near highly unstable slopes (Humboldt County 2022i, HCPBD 2015). There is an active slope failure along Van Wycke Street that damaged the existing water supply line and is currently impacting the temporary water supply line that was installed to service this area. The Project Area located along Westhaven Drive is mapped as being located on slopes with low instability. There are high instability slopes located adjacent to the Project Area that are topographically higher (HCPBD 2015); however, no landslides have been mapped on these slopes.

Expansive soils can cause considerable distress to roads and building foundations as they “rise-and-fall” in accordance with the cycles of soil wetting (swelling) and drying (shrinking). Soils with high percentages of silicate clays are those that have the potential for shrinking and swelling. The soils located in the Project Area that is in the City of Trinidad are classified as being loam, sandy loam, or loamy sands, which are not prone to shrinkage or expansion (NRCS 2022a). However, these soils can be prone to slope failure and settlement. Some of the soils located in the Project Area along Westhaven Drive, including in the area where water tank replacement is planned, are classified as clay loam and sandy clay loam (NCRS 2022b). These soils include the Megwil and Cannonball soils and the Lepoil-Espa-Candymountain complex. The highest percentage of clay expected from the Megwil and Cannonball soils is 34%. The highest percentage of clay expected from the Lepoil-Espa-Candymountain complex is also 34%. Based on the liquid limit and plasticity data reported in the NCRS Soil Data Explorer, these clays would be expected to be low-plasticity clays and would not have high potential to shrink and swell. Therefore, due to the proximity to an active slope failure, the impact of geologic hazards to the Project is considered potentially significant. Mitigation Measure GEO-1 has been incorporated into the Project to reduce the potential effect to a less than significant level.

Mitigation

Implementation of Mitigation Measure GEO-1 would be incorporated into the Project to reduce impacts from unstable soils.

Mitigation Measure GEO-1: Implement Recommendations of the Geotechnical Investigation

A geotechnical investigation will be completed to support the Project’s design, prior to implementation. The City will implement the recommendations of the geotechnical investigation before and/or during construction as appropriate to reduce risks associated with unstable soils, erosion, and other geologic hazards.

With incorporation of Mitigation Measure GEO-1, impacts from unstable soils would be avoided or offset through recommendations from the future geotechnical report. This potential impact would be less than significant with mitigation.

b) Result in substantial soil erosion or the loss of topsoil? (Less Than Significant Impact)

Construction activities, including excavation, grading, soil compaction, and operation of heavy machinery would disturb soil and, therefore, have the potential to cause erosion. A SWPPP would be required under Environmental Protection Action 1 and includes measures to prevent and minimize erosion. Erosion and sediment control provisions prescribed in the Humboldt County Municipal Code, City of Trinidad Municipal Code, California Building Code, and the SWPPP would be required as part of the Project. Erosion protection would include but not be limited to silt fences, straw wattles, soil stabilization controls, and site watering for controlling dust. Erosion protection measures would be designed to stabilize soils and minimize the potential transport of sediment to receiving waters during and post construction. Therefore, the potential soil erosion impact from construction would be less than significant.

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? (No Impact)

The Project does not propose the installation or modification of septic tanks or wastewater disposal systems, and it produces no wastewater. Therefore, construction and operation of the Project would have no impact on wastewater infrastructure.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less Than Significant with Mitigation)

Paleontological resources are the remains or traces of prehistoric animals and plants. Paleontological resources, which include fossil remains and geologic sites with fossil-bearing strata are non-renewable and scarce and are a sensitive resource afforded protection under environmental legislation in California. Under California PRC § 5097.5, unauthorized disturbance or removal of a fossil locality or remains on public land is a misdemeanor. State law also requires reasonable mitigation of adverse environmental impacts that result from development of public land and affect paleontological resources (PRC § 30244).

It is unlikely that Project construction would impact potentially significant paleontological resources because most of the Project occurs in relatively newly deposited alluvium and within road corridors where previous construction has occurred. However, the possibility of encountering a paleontological resource during construction cannot be completely discounted, therefore, the impact related to the potential disturbance or damage of previously undiscovered paleontological resources, if present, is considered potentially significant. Mitigation Measure GEO-2 has been incorporated into the Project to reduce the potential effect to a less than significant level.

Mitigation

Implementation of Mitigation Measure GEO-2 would be incorporated into the Project to reduce impacts on paleontological resources.

Mitigation Measure GEO-2: Inadvertent Discovery of Paleontological Resources

In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they would be properly curated and preserved.

Therefore, implementation of Mitigation Measure GEO-2 would reduce this impact to a less-than-significant level because a plan to address discovery of unanticipated paleontological resources and to preserve and/or record those resources consistent with appropriate laws and requirements shall be implemented.

5.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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	

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less Than Significant)

The NCUAQMD has not adopted regulations regarding the evaluation of greenhouse gas (GHG) emissions in a CEQA document and has not established CEQA significance criteria to determine the significance of impacts with regard to GHGs (NCUAQMD 2019). The NCUAQMD has stated that they would not comment adversely on the use of thresholds of significance from the Bay Area Air Quality Management District (BAAQMD) for projects within Humboldt County. However, the BAAQMD has recently revised their adopted recommended CEQA thresholds of significance for GHG. The BAAQMD's Justification Report for the newly adopted greenhouse gas thresholds identify the thresholds as specific for 'development projects' of commercial/residential development and other projects. Per the Draft Justification Report:

> The Air District has developed these thresholds of significance based on typical residential and commercial land use projects and typical long-term communitywide planning documents such as general plans and similar long-range development plans. As such, these thresholds may not be appropriate for other types of projects that do not fit into the mold of a typical residential or commercial project or general plan update.
>
> Lead agencies should keep this point in mind when evaluating other types of projects. A lead agency does not necessarily need to use a threshold of significance if the analysis and justifications that were used to develop the threshold do not reflect the particular circumstances of the project under review. Accordingly, a lead agency should not use these thresholds if it is faced with a unique or unusual project for which the analyses supporting the thresholds as described in this report do not squarely apply. In such cases, the lead agency should develop an alternative approach that would be more appropriate for the particular project before it, considering all of the facts and circumstances of the project on a case-by-case basis.

Additionally, the BAAQMD's Justification Report states:

> There is no proposed construction-related climate impact threshold at this time. Greenhouse gas emissions from construction represent a very small portion of a project's lifetime GHG emissions. The proposed thresholds for land use projects are designed to address operational GHG emissions which represent the vast majority of project GHG emissions. (BAAQMD 2022)

Therefore, as the BAAQMD and NCUAQMD do not have recommended thresholds of significance to apply to construction-period emissions or water infrastructure projects, the Sacramento Metropolitan Air Quality Management District's (SMAQMD) and South Coast Air Quality Management District's (SCAQMD) recommended GHG methodology and thresholds for construction impacts were applied. For Project construction, SMAQMD has a threshold of 1,100 metric tons of carbon dioxide ($MTCO_2e$) per year threshold of significance (SMAQMD 2021). SCAQMD recommends that construction emissions be amortized over the life of the Project, defined as 30 years, and added to the operational emissions for comparison against the threshold of significance.

Based on CalEEMod modeling (attached as Appendix A), Project construction activities would result in a small, temporary increase in GHG emissions, including exhaust emissions from on-road trucks, worker commute vehicles, and off-road heavy-duty equipment. Construction would require clearing, earthmoving, and delivery equipment, as used for similar Projects, and which have been accounted for in the State's emission inventory and reduction strategy for both on and off-road vehicles. Construction emissions were estimated using CalEEMod version 2020.4.0 and were estimated to be approximately 172 $MTCO_2e$ from all construction activities. The Project's construction emissions would be approximately 5.74 $MTCO_2e$ per year when annualized over the assumed 30-year lifespan of the Project.

Required maintenance of the Project would be similar to what maintenance requirements are currently. Therefore, the Project's would not generate an increase in operation-related emissions.

Project emissions of 5.74 $MTCO_2e$ per year (annualized construction) would be less than the 1,100 $MTCO_2e$ threshold applied. Therefore, the Project's impact would be less than significant.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases? (Less Than Significant)

The California Air Resource Board (CARB) 2017 Climate Change Scoping Plan provides California's climate policy portfolio and recommended strategies to put the State on a pathway to achieve the 2030 GHG target. The scenario includes ongoing and statutorily required programs, continuing the Cap-and-Trade Program, and high-level objectives and goals to reduce GHGs across multiple economic sectors. Existing programs, also known as "known commitments," identified by the 2017 Climate Change Scoping Plan include: SB 350, the LCFS, CARB's Mobile Source Strategy, SB 1383 for short-lived climate pollutants and California's Sustainable Freight Action Plan. The high-level objective and goals recommendations cover the energy, transportation, industry, water, waste management, agriculture, and natural and working lands, and are to be implemented by a variety of State agencies.

Project construction would cause a temporary increase in GHGs; however, as discussed above Project emissions would not exceed the identified emission thresholds. Project construction is analyzed for consistency with the 2017 Climate Change Scoping Plan in Table 5.8-1 – Consistency Analysis Between Project and Climate Change Scoping Plan.

Table 5.8-1 Consistency Analysis Between Project and Climate Change Scoping Plan

Scoping Plan Reduction Measures	Consistency/Applicability Determination
California Cap-and-Trade Program Linked to Western Climate Initiative. Implement a broad-based California Cap-and-Trade program to provide a firm limit on emissions. Link the California cap-and-trade program with other Western Climate Initiative Partner programs to create a regional market system to achieve greater environmental and economic benefits for California. Ensure California's program meets all applicable AB 32 requirements for market-based mechanisms.	**Not Applicable.** This is a statewide measure that cannot be implemented by the Project or lead agency.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel, and vehicle technology programs with long-term climate change goals.	**Consistent**. This is a statewide measure that cannot be implemented by the Project or lead agency. However, the standards would be applicable to the light-duty vehicles that would access the Project Area during construction.
Energy Efficiency. Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Not Applicable**. This is a measure for the state to increase its energy efficiency standards in new buildings. The Project would not result in new habitable buildings subject to the energy efficiency standards.
Renewable Portfolio Standard. Achieve 33 percent renewable energy mix statewide. Renewable energy sources include (but are not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas.	**Not Applicable.** This is a statewide measure that cannot be implemented by the Project or lead agency.

Scoping Plan Reduction Measures	Consistency/Applicability Determination
Low Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Consistent**. This is a statewide measure that cannot be implemented by the project or lead agency. The standard would be applicable to the fuel used by vehicles that would access the Project Area during construction.
Regional Transportation-Related Greenhouse Gas Targets. Develop regional greenhouse gas emissions reduction targets for passenger vehicles. This measure refers to SB 375.	**Not Applicable.** This is a statewide measure calling for the development of GHG emission reduction targets.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** This is a statewide measure that cannot be implemented by the Project or lead agency.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** The Project does not propose any changes to modes of transportation of goods.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Not Applicable.** The Project does not involve structures with roofs.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** This is a statewide measure that cannot be implemented by the Project or lead agency.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost- effectively reduce greenhouse gas emissions and provide other pollution reduction co-benefits. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission. Adopt and implement regulations to control fugitive methane emissions and reduce flaring at refineries.	**Not Applicable.** This measure would apply to the direct GHG emissions at major industrial facilities. The Project is not industrial.
High Speed Rail. Support implementation of a high-speed rail system.	**Not Applicable**. This is a statewide measure that cannot be implemented by the Project or lead agency. The Project does not involve a high-speed rail system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Not Applicable**. This is a measure for the state to increase its energy efficiency standards in new buildings. The Project would not result in new habitable buildings subject to the energy efficiency standards.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable**. The Project would not include air conditioners or commercial refrigerators.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** The Project does not include a landfill. The Project would reduce construction waste with implementation of state mandated recycling and reuse mandates.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable**. Although the Project is located in a rural setting, it would not adversely affect forestland. Additionally, the Project would not include areas suitable for reforestation. The Project would replant native trees removed during construction (see Section 5.5 – Biological Resources regarding Sensitive Natural Communities).
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Not Applicable**. The Project would not include an increase in water consumption or energy use associated with water treatment or transport.
Agriculture. In the near-term, encourage investment in manure digesters and at the five- year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** The Project does not include agricultural production.

Source of Scoping Plan Reduction Measures: CARB 2017

As described in Table 5.8-1, the Project is consistent with AB 32, as outlined in the 2017 Climate Change Scoping Plans. Therefore, the Project would not conflict with AB 32 or the 2017 Climate Change Scoping Plan and would result in a less than significant impact.

5.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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 compiled 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	

To evaluate the Project Area with respect to the presence and location of existing and/or historical soil and groundwater contamination, a regulatory database review of available online government records was completed. The regulatory database review was completed to identify areas of potentially impacted soil and/or groundwater within and near the Project Area that could potentially pose an exposure risk to humans and/or the environment.

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Less Than Significant Impact)

Project demolition could result in exposure of construction workers to Asbestos Containing Material (ACM) that may be present in the existing facilities. Project structures for removal include the existing Asbestos Concrete (AC) pipe. During construction asbestos abatement would be conducted, as necessary, to remove existing ACM from existing structures. Appropriate notifications would be made to the NCUAQMD in accordance with the National Emissions Standards for Hazardous Air Pollutants (NESHAP) requirements for ACM prior to the commencement of asbestos abatement and/or construction work at the Project site. NESHAP are a series of pollutant-specific regulations which are designed to minimize the public's exposure to hazardous chemicals through the use of specific types of control equipment and the implementation of various control methods or procedures. The NCUAQMD has been delegated by the EPA to enforce NESHAP for the Project Area and administers all of the NESHAP regulations including the sections applicable to the demolition and renovation of structures that utilized ACM in their construction. The Asbestos NESHAP requires owners and operators to provide written notification of regulated demolition and renovation activities. A licensed abatement contractor would be engaged to conduct abatement work in accordance with

specifications. Therefore, implementation of regulatory requirements would ensure that potential impacts from exposure to ACM during demolition would be less than significant.

Construction of the Project would include the transport and use of common hazardous materials inherent to the construction process, including petroleum products such as fuel and lubricants for construction equipment and vehicles, paints, concrete curing compounds, and solvents for construction of Project improvements. These materials are commonly used during construction, are not acutely hazardous, and would be used in relatively small quantities.

Hazardous materials storage, handling, and transportation must comply with an interconnected matrix of local, state, and federal laws. Hazardous materials used during construction of the Project will be subject to applicable regulations, including California Health and Safety Code Section 25531, Division 20, Chapter 6.5, and other standards enforced by the various departments and boards under the California Environmental Protection Agency (Cal/EPA). The Project will be subject to Cal/EPA hazardous materials regulations consolidated under the state's Unified Program enforced by the Department of Toxic Substances Control (DTSC), the State Water Resources Control Board (SWRCB), North Coast Regional Water Quality Control Board (Regional Board), NCUAQMD, and the Department of Resources Recycling and Recovery (CalRecycle). The Cal/EPA administers the Unified Program via local Certified Unified Program Agencies (CUPAs). The CUPA for Humboldt County is the Humboldt County Division of Environmental Health (HCDEH). The HCDEH Hazardous Materials Unit has jurisdiction over the Project Area and is tasked with local CUPA inspections and compliance. Project activities involving the transport, use, storage, and disposal of hazardous materials will be in accordance with established rules and regulations.

Worker exposure to hazardous materials is regulated by California Department of Industrial Relations, Division of Occupational Safety and Health (Cal/OSHA) and requires worker safety protections. Cal/OSHA enforces hazard communication regulations which require worker training and hazard information (signage/postings) compliance. In addition, hazard communication compliance includes procedures for identifying and labeling hazardous substances, communicating information related to hazardous substances storage, handling, and transportation; and preparation of health and safety plans to protect employees.

Project construction specifications will require the management of hazardous materials to comply with applicable laws, rules, and regulations. During Project construction, the contractor would be required to contain hazardous materials and avoid exposure to workers, the public, and surrounding environment during construction. An appropriate facility would be utilized for legal disposal of any hazardous materials generated.

Project construction would be required to implement stormwater management requirements during construction in accordance with the State Water Resources Control Board General Construction Storm Water Permit (Environmental Protection Action 1 - SWPPP). Stormwater management requirements for addressing materials management would be required, including proper material delivery and storage, spill prevention and control, and management of concrete and other wastes, as described in Section 5.10 (Hydrology and Water Quality).

The established regulatory framework, BMPs, and requisite construction protocols provide appropriate risk mitigation and hazard protections, thus the Project would not create a significant hazard to the public or environment from hazardous materials. Because the City and its contractors would be required to comply with existing and future hazardous materials laws and regulations addressing the transport, storage, use, and disposal of hazardous materials, the potential to create a significant hazard to the public or the environment during Project construction would be less than significant.

Following construction, operation of the Project would require intermittent maintenance and repair, which could involve hazardous materials similar to what is occurring now. The operational risk posed by intermittent maintenance and repair of the water tanks and pipes specific to hazardous materials is low. The potential to create a significant hazard to the public or the environment during Project operation would be less than significant.

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?? (Less Than Significant)

The Project would utilize heavy machinery to perform some construction-related tasks including grading, excavation, and transportation of materials. There is always the possibility when equipment is operating that an accident could occur, and fuel could be released onto the soil. As a standard BMP, equipment on-site during construction would have emergency spill cleanup kits accessible in the case of any fuel or oil spills. Equipment would not be refueled near any perennial wetlands or waters. If equipment must be washed, it would be washed off-site. Thus, any potential impact would be less than significant.

c) 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)

The Trinidad Elementary school is located within 0.25 mile of the Project on Edwards Street in Trinidad. The Project includes the use of heavy machinery which would emit hazardous emissions such as carbon monoxide and are assumed to include the use of hazardous materials such as fuels, lubricants, degreasers, paints, and solvents. These materials are commonly used during construction, are not acutely hazardous, and would be used in small quantities. Given that construction is linear in design, exposure to the emissions associated with construction equipment would be considered less than significant.

Numerous laws and regulations ensure the safe transportation, use, storage, and disposal of hazardous materials. Although construction activities could result in the inadvertent release of small quantities of hazardous substances, a spill or release at a construction area is not expected to endanger individuals at nearby schools given the nature of the materials, the small quantities that would be used, and the distance of the schools from the Project Area. Therefore, because the City and its contractors would be required to comply with existing and future hazardous materials laws and regulations covering the transport, use, and disposal of hazardous materials, and because of the nature and quantity of the hazardous materials to be potentially used by the Project, the impact related to the use of hazardous materials during construction near the school would be less than significant. Project operations would have no impact on the Trinidad Elementary school.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? (No Impact)

The Project Area is not located on, or within one mile of a site listed in the DTSC EnviroStar database (DTSC 2022). Further, the Project Area is not located on or within one mile of an open site included in the Cal/EPA's list of Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, nor is the Project Area located on or within one mile of an open site included in Cal/EPA's list of active Water Board Cease and Desist Orders and Cleanup and Abatement Orders (Cal/EPA 2022). No impact would result.

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? (No Impact)

The Project is not located within an airport land use plan or within two miles of a public airport. Therefore, no impact would result.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Less Than Significant Impact)

The Project Area is covered under the City of Trinidad Emergency Operations Plan (EOP) and the Humboldt County EOP. The City of Trinidad EOP identifies the emergency response and evacuation policies and procedures associated with natural disasters, technological incidents, and national security emergencies (City of Trinidad 2014).

The Humboldt County EOP identifies the emergency response and evacuation policies and procedures for hazards related to earthquake, tsunami, extreme weather, flooding/flash flooding, landslides, transportation accidents, hazardous materials, interface wildlife fire, energy shortage, offshore toxic spill, civic disturbance, terrorist activities, and national security (Humboldt County 2015).

The Humboldt County EOP establishes a structure for Humboldt County Operation Area agencies to respond to large-scale emergencies requiring multiagency participation or activation of the Humboldt County Emergency Operations Center (EOC) (Humboldt County 2015). Hazard mitigation and risk assessment strategies for Humboldt County Operation Area are formalized in the Humboldt County Operational Area Hazard Mitigation Plan (HMP).

Temporary lane closures would be required during Project construction. Signage, notifications, and timing for road closure, as applicable, would be established in accordance with City and County requirements. Emergency response vehicles would not be impeded during road closures.

The Project would not impair implementation or physically interfere with the established City of Trinidad EOP, Humboldt County EOP, or Humboldt County HMP. Once constructed, operational use of the Project would return to baseline levels with no modification to road geometry. Thus, emergency response or evacuation via existing roadways would not diminish compared to existing conditions. As the Project would not impair implementation of an emergency response plan or evacuation plan, the potential impact related to construction would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? (Less Than Significant Impact)

Please see Wildfire Section 5.20 (b).

5.10 Hydrology and Water Quality

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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:			X	
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 off-site?			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

The Project is located within the Trinidad hydrologic unit, adjacent to Luffenholtz Creek, and an unnamed first order stream. Luffenholtz Creek is the primary water source for the City of Trinidad and drains into the Pacific Ocean. Luffenholtz Creek is considered a second order stream.

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality? (Less Than Significant)

The Project is required to obtain and comply with necessary Clean Water Act permits requirements from the Regional Board and USACE, to ensure the Project does not violate any water quality standards or waste discharge requirements.

Construction activities such as site clearing, grading, excavation, and material stockpiling, placement of aggregate base, and related construction activities could leave soils exposed to rain or surface water runoff that may carry soil contaminants (e.g., nutrients or other pollutants) into waterways adjacent to the site, degrade water quality, and potentially violate water quality standards for specific chemicals, dissolved oxygen, suspended sediment, or nutrients to surface waters. The greatest potential Project impacts to water quality would result from sediment mobilization during construction. This impact is considered to be potentially significant.

As a condition of the Project's Coastal Development Permit, the Project would submit for review and approval of the Planning Director a plan for temporary storage and disposal of construction debris. The plan would demonstrate that:

a) no construction materials, debris, or waste shall be placed or stored during construction where it may be subject to entering wetlands or creeks; b) final disposal locations for debris from construction activities are in upland areas and not impacting ESHA; and c) all debris from construction activities are removed within 30 days following completion of construction. The plan would include a site plan showing all proposed locations for stockpiling construction materials, debris, or construction waste; description of the manner by which the material would be removed from the construction-site and identification of all debris disposal sites that would be used; and a schedule for removal of all debris.

Also, as a condition of the Project's Coastal Development Permit, the Project would be required to submit for review and approval of the Planning Director a plan to reduce impacts to water quality from the use and management of hazardous materials associated with construction activities on-site. The plan would be prepared by a licensed engineer with experience in hazardous material management. No changes to the approved plan would occur without the consent of the Planning Director.

The proposed Project is anticipated to disturb over one (1) acre of land, therefore compliance with State Water Board Order No. 2009-0009 would be required which will regulate stormwater runoff from Project construction activities. Project operations will obtain coverage under State Water Resources Control Board Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, as amended by Order No. 2012-0006. In compliance with the National Pollutant Discharge Elimination System requirements, a Notice of Intent would be prepared and submitted to the North Coastal Regional Water Board prior to undertaking construction, providing notification and intent to comply with the State of California Construction General Permit (CGP). In addition, a SWPPP would be prepared for pollution prevention and control prior to initiating site construction activities.

The Construction SWPPP would be written by a Qualified SWPPP Developer (QSD); would identify and specify the use of best management practices (BMPs) erosion control, sediment control, off-site tracking control, wind erosion control, non-stormwater management control, and waste management and materials pollution control. A sampling and monitoring program would be included in the Construction SWPPP that meets the requirements of the CGP to ensure the BMPs are effective. A Qualified SWPPP Practitioner (QSP) would oversee implementation of the Plan, including visual inspections, sampling and analysis, and overall compliance with the SWPPP and CGP.

Implementation of Environmental Protection Action 1, combined with Mitigation Measures BIO-4 though BIO-6 would reduce potential water quality impacts during Project construction activities to a less-than-significant level by requiring measures to minimize erosion, sediment, and pollutant contribution to surface waters.

Following construction, operation and maintenance of the Project would not result in a new point discharge or a substantial increase in impervious surfaces relative to the surrounding area. Therefore, less than significant operational impact would result.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? (No Impact)

The Project is located in the Big Lagoon Area Basin 1-027, which has a SGMA Basin Priority of Very Low and is not listed as Critically Overdrafted (DWR 2020). Contractor-supplied water would be used during construction for dust suppression on local roadways and work areas. Use of groundwater is not anticipated for construction of the Project. Similarly, the Project would not decrease groundwater supplies or interfere with groundwater management. During roadway construction, isolated and short-duration groundwater dewatering may occur as needed and would be small in scale and limited to shallow groundwater only. The construction-related impact on groundwater levels would not result.

Following construction, the Project would not utilize groundwater and would not result in an increase in population or employment that would indirectly increase groundwater demand. The Project would not alter groundwater recharge. Therefore, the Project would not create a deficit in aquifer volume or a lowering of water levels. Additionally, no new impervious surface would be created, and the Project road would be consistent with the previous conditions in the

area. The Project is not expected to result in any change in the use or recharge of groundwater. No construction or operational impact to groundwater resources would result.

c.i) 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 result in substantial erosion or siltation on- or off-site? (Less Than Significant)

The Project would not add any new areas of impervious surfaces to the Project Area through the replacement of underground pipes and the subsequent repair of the road. Erosion and sediment prevention would be implemented during construction to avoid impacts to water quality, including those related to siltation (see impact “a” above). The Project would be required to adhere to BMPs and conditions to be included in a SWPPP and CWA Section 401 and 404 permits to prevent erosion-related impacts during construction. Substantial on- or off-site erosion and siltation would not result, and the potential construction-related impact with regard to erosion and siltation would be less than significant. Operationally, the Project would be located mostly underground, and would not contribute to slope instability, future erosion, and risk of siltation, thus the impact would also be less than significant.

c.ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? (Less Than Significant)

The Project Area is not located in the Federal Emergency Management Agency (FEMA) 100-year flood zone (Humboldt County 2022d). Within the Project Area, existing stormwater drainage systems along the road are minimal and stormwater is generally discharged into the Pacific Ocean. In locations where the water pipe replacement would encroach into an existing drainage ditch, the drainage ditch may need to be reconstructed at approximately the same grade and depth. The Project would repair the road following construction to be consistent with previous conditions. The potential impact to on- and off-site flooding would be less than significant.

c.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? (Less Than Significant)

Within the Project Study Boundary existing stormwater drainage systems along the road are minimal and stormwater is generally discharged into the Pacific Ocean. Under existing conditions, there are no signs of localized flooding within the Project Area.

Grading would occur during summer and fall months when conditions are driest, to minimize the risk of rainfall during the construction period and thus stormwater runoff when soils are exposed. As discussed above in Hydrology and Water Quality Section (a), requirements of the SWPPP, CWA Section 401, and CWA Section 404 permits would also be implemented, including measures to prevent polluted stormwater runoff during construction. Thus, any construction-related impact would be less than significant.

Operationally, the Project does not include elements that would significantly alter topography and rates of stormwater runoff. The potential operational impact would be less than significant.

c, iv) Impede or redirect flood flows? (Less Than Significant)

The Project Area is not located in the FEMA 100-year flood zone (Humboldt County 2022d). The Project would not alter existing drainage patterns and does not include any changes to drainage structures (e.g., highway culverts or bridges) that could impede or redirect flood flows. Any potential impact on the impediment or redirection of flood flows would be less than significant

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (No Impact)

The Project Area is not located in the FEMA 100-year flood zone (Humboldt County 2022d); thus, a flood hazard would not result from the Project. No impact related to flood hazards would result.

The Project Area is not located near a larger isolated body of water that may be affected by a seiche. No impact from a seiche would result.

The Project Area is not located within a tsunami hazard zone (Humboldt County 2022e). No impact from a seiche or tsunami would result. No impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (No Impact)

The relevant water quality control plan is the NCRWQCB's Basin Plan which establishes thresholds for key water resource protection objectives for both surface waters and groundwater. The Project does not involve the use of groundwater resources and would not impact the quantity or quality of groundwater availability in the Big Lagoon Area Groundwater Basin.

The Project would be required to obtain coverage under SWRCB Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities, which would include development and implementation of a SWPPP. The Project is also required to obtain and adhere to Clean Water Act Section 401 and Clean Water Act Section 404 permits (see Section 2.3 – Regulatory Permits, CEQA, and NEPA). Adherence to these regulatory requirements and associated requisite monitoring would ensure a conflict with the Basin Plan does not occur. No impact would result.

5.11 Land Use and Planning

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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

This section evaluates the potential impacts related to land use, as it applies to construction and operation of the Project. The Project spans the jurisdiction of both the City of Trinidad and Humboldt County.

a) Physically divide an established community? (No Impact)

The Project would involve construction and operation of water storage tanks, including replacement of undersized and leaking piping. These elements would primarily be underground and would not divide any existing neighborhood or community. No impact would result.

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? (No Impact)

The Project is entirely within the California Coastal Zone and is designated Appeal and Local jurisdictions (Appendix A – Figure 2, Humboldt County 2022c). The portion of the PSB in the Westhaven Drive and access road area is in the jurisdiction of the Humboldt County LCP. The Trinidad Area Plan (2014) is the Land Use Plan for this area, and the Humboldt County Coastal Zoning Code is the Implementation Plan. The portion of the Project in the area of Edwards and Van Wycke Street and the water tank site is in the jurisdiction of the City of Trinidad LCP. The City of Trinidad's General Plan (1978) is the Land Use Plan for the City's LCP, and the Implementation Plan consists of the zoning, grading, building and subdivision ordinances. Coastal Development Permits from the City and the County would be acquired prior to commencing construction. The Project would adhere to all requirements of the CDP, and all other permits required in Section 2.3.

Applicable policies adopted for the purpose of avoiding or mitigating environmental effects can be found throughout the Trinidad Area Plan and City of Trinidad General Plan. A review of the Trinidad Area Plan and City of Trinidad General Plan elements, and the policies and standards within, did not identify any inconsistencies with the proposed Project. Specifically, the Project is consistent with the following goals included in the Trinidad Area Plan:

– 30254: New or expanded public works facilities shall be designated and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division; provided, however, that it is the intent of the legislature that State Highway Route l in rural areas of the coastal zone remain a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal- dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

The Project is consistent with the following City of Trinidad General Plan policies:

– Policy 22: The City should promote an active on-going water conservation program to help keep user charges as low as possible. City conservation program should extend to upgrading outdated portions of the system to eliminate leakage.
– Policy 23b: The City shall plan on regular maintenance and occasional upgrading of the water system, as feasible. The City shall develop a program to periodically upgrade existing distribution lines to current standards.

To keep the City up to date on the condition of the water system, need for improvements, and level of uses, an annual water report shall be prepared and presented to the City Council.

Agencies that regulate the filling of wetlands include the USACE and the NCRWQCB. Since the proposed Project would affect USACE and NCRWQCB jurisdictional wetlands, the City will obtain the necessary permit(s) to comply with respective regulations including a CWA Section 404, and Section 401 Water Quality Certification. By implementing permit requirements and mitigation measures identified in the Section 5.4 – Biological Resources above, the Project would not conflict with any applicable federal and State wetland regulations. Additionally, the proposed Project would not permanently alter the existing land uses, their designations, or their zoning, and would not introduce new land uses or land use designations or zoning; therefore, no conflict with applicable land use plans, policies, or regulation(s) would occur. No impact would result.

5.12 Mineral Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			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	

a, b) 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, or a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? (Less Than Significant)

The Project would require minor use of rock, gravel, sand, and other similar materials, but is not expected to have any significant impact on locally available minerals or mineral resources valuable to the region or the State. Additionally, the Project Area is also not designated by the Humboldt County General Plan or other local land use plan as having locally important mineral resources within the Project Area (Humboldt County 2017). The impact would be less than significant.

5.13 Noise

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Result in 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) Result in generation of excessive groundborne vibration or 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

Current noise conditions on and near the Project Area consist of traffic along US 101, as well as the adjacent local roadways along the proposed alignment. There are sensitive receptors within 30 feet of the Project Area, which are residential homes. The nearest school, Trinidad Elementary School, is approximately 0.12 mile away. Additional industrial and commercial land uses are located in the Trinidad downtown approximately 400 feet away, the Trinidad Harbor area approximately 0.1 mile away, and along Quarry Road approximately 0.7 mile from the Project Area.

a) Result in 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? (Less Than Significant)

The Project is entirely within the California Coastal Zone. The portion of the Project in the Westhaven Drive area is in the jurisdiction of the Humboldt County LCP. The Trinidad Area Plan (2014) is the Land Use Plan for this area, and the Humboldt County Zoning Code is the Implementation Plan. The portion of the Project in the area of Edwards and Van Wycke Street and water tanks is in the jurisdiction of the City of Trinidad LCP. The City of Trinidad's General Plan (1978) is the Land Use Plan for the City's LCP, and the Implementation Plan consists of the zoning, grading, building and subdivision ordinances. However, the Trinidad Area Plan does not provide noise thresholds. Therefore, the Humboldt County General Plan noise policies are applied in this Section even though these policies are non-binding in the coastal zone and the Humboldt County General Plan is not certified for use in the coastal zone. In addition, as per the City's Municipal Code Section 15.16.080, the City planning commission may add noise requirements within the grading permit which would be adhered to.

Construction

Construction of the Project would result in a temporary noise increase associated with the use of construction equipment for the Project for one construction season (commencing in the summer of 2023 and conclude by December 2023). As the Project is linear in nature, the noise associated with construction activities would move along the alignment as work is conducted, resulting in intermittent increases at each of the adjacent sensitive receptors during the construction phase that would shift as construction progresses. Within the City of Trinidad per section 15.16.210 of the City's grading ordinance, construction would be limited to daytime work hours between 8am to 5:30pm unless different hours are specified by the City Engineer. For activities along Westhaven Drive, construction would be limited to daytime work hours between 7:00 a.m. to 7:00 p.m., Monday through Friday with occasional work on Saturdays. Furthermore, neither the Trinidad General Plan, nor the Humboldt County general plan, have established construction-related noise standards. As the construction phase would be temporary and construction

activities would be intermittent and limited to between 7:00 a.m. and 7:00 p.m., potential noise impacts generated during the construction phase would be less than significant.

Operation

The Trinidad General Plan specifies that the Land Use/Noise Compatibility Standards (Table 5.13-1 below) shall be used to ensure compatibility of land uses. The Humboldt County General Plan includes Standard N-S1 (Table 5.13-2 below) for a guide to ensure compatibility of land uses. Development may occur in areas identified as "normally unacceptable" if mitigation measures can reduce indoor noise levels to "Maximum Interior Noise Levels" and outdoor noise levels to the maximum "Normally Acceptable" value for the given Land Use Category.

For measuring noise levels and setting noise standards, the County uses Table 13-C (Table 5.13-1 below) of the Humboldt County General Plan, which stipulates that 60 Community Noise Equivalent Level (CNEL) is the upper acceptable limit for residential units (outside measurement), and 85 CNEL is the upper acceptable limit for "public ROW" land uses. CNEL is a measure that describes the average noise exposure over a period of time.

Table 5.13-1 Trinidad General Plan Land Use Noise Compatibility Standards

Land Use Classification	Desired Ambient Level, db (A)	
Residential, rural-suburban	Night	Less than 40 - 45
	Day	Less than 45 - 50
Residential, suburban	Night	Less than 45 - 50
	Day	Less than 50 - 55
Residential, low-density urban	Night	Less than 50 - 55
	Day	Less than 55 - 60
Residential, medium/high density	Night	Less than 55 - 60
	Day	Less than 60 - 65

Table 5.13-2 Humboldt County Land Use Noise Compatibility Standards

Land Use Category	Maximum Interior Noise Level	Clearly Acceptable Noise Standard (CNEL)	Normally Acceptable Noise Level (CNEL)	Normally Unacceptable Noise Level (CNEL)	Clearly Unacceptable Noise Level (CNEL)
Residential Single Family, Duplex, Mobile Homes	45	50-55	56-60	61-75	76+
Agriculture (except livestock), Mining, Fishing	-	50-75	76+	-	-
Public Right of Way	-	50-75	76-85	86+	-

Source: Humboldt County General Plan 2017

Once the Project is constructed, the Project would not generate a significant amount of noise. Noise associated with the operation of the Project would be underground. Therefore, operation would not result in noise levels exceeding the City noise standards for residential units. A less than significant impact would result.

b) Result in generation of excessive groundborne vibration or noise levels? (Less Than Significant)

Neither the Trinidad Area Plan nor the City of Trinidad General Plan nor the Humboldt County General Plan establish vibration limits to minimize the potential for cosmetic damage to buildings. However, Caltrans recommends a vibration limit of 0.5 inches/second peak particle velocity (PPV) for buildings structurally sound and designed to modern engineering standards, 0.3 inches/second PPV for buildings that are found to be structurally sound but where structural damage is a major concern, and a conservative limit of 0.08 inches/second PPV for ancient buildings or

buildings that are documented to be structurally weakened. No known buildings that are documented to be structurally weakened adjoin the Project Area. Therefore, the 0.5 inches/second PPV limit would apply when considering the potential for groundborne vibration levels to result in a significant vibration impact.

The noise and vibration evaluation assessed typical vibration levels that could be expected from construction equipment at a distance of 25 feet. Project construction activities, such as drilling, the use of jackhammers, and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.) may generate substantial vibration in the immediate vicinity.

Table 5.13-3 presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet. High-power or vibratory tools and rolling stock equipment (e.g., tracked vehicles, compactors), may generate substantial vibration in the immediate vicinity. Vibratory rollers typically generate vibration levels of 0.210 inches/second PPV at a distance of 25 feet. Vibration levels are highest close to the source and attenuate with increasing distance. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

Table 5.13-3 Typical Vibration Levels for Construction Equipment Used During Project Construction (Caltrans 2020)

Equipment	PPV at 25 ft. (in/sec)	Approximate Lv at 25 ft. (VdB)
Vibratory Roller	0.210	94
Large Bulldozer	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Project-related activities would not involve the use of explosives or other intensive construction techniques that could generate significant ground borne vibration or noise. No pile driving is anticipated; however, the Project may utilize a vibratory roller, large bulldozer, and jackhammer. Noise impacts from ground borne noise to humans are anticipated to be minor.

Vibration impacts to residences are anticipated to be minor as the closest residences are located approximately 30 feet away. A residence at a distance of approximately 25 feet away from a vibratory roller, as shown in Table 5.13-3, would be exposed to vibration levels up to 0.21 inches/second PPV, which is substantially less than the applicable 0.5 inches/second PPV limit for modern construction. Minor vibration adjacent to mechanized equipment and road/trail treatments during construction work would be generated only on a short-term basis. Therefore, groundborne vibration and noise would have a less than significant impact.

Following construction, operation of the Project would not result in substantial sources of groundborne vibration or groundborne noise. Project operation would not generate vibration, except in instances where larger repairs or maintenance culverts and bioswales might be required. These conditions would be short-term and temporary (taking from one to several weeks to complete depending on the extent of damage or other circumstances); therefore, no operational impact would result.

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? (No Impact)

The Project Area is located approximately 5.5 miles north of California Redwood Coast Airport - KACV and approximately 4.5 miles north of the Samoa Field Airport. The Project is not located within an airport land use plan. Therefore, the Project would not expose people residing or working in the Project Area to excessive noise levels. No impact would result.

5.14 Population and Housing

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

The 2020 population for the City of Trinidad was estimated to be 307, and the community of Westhaven-Moonstone was estimated to be 1,187 people (US Census 2020).

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? (No Impact)

The Project would not be growth-inducing and would not result in new homes or businesses directly or indirectly. No new roads, extension of utilities, or other infrastructure would be installed or constructed that would indirectly allow for additional residential units or commercial uses to be constructed. Further, the Project does not include any residential units that would directly induce population growth. The Project would not expand water utilities but would enhance resiliency of the existing system during drought conditions. Maintenance of Project elements is anticipated to be performed by local City of Trinidad staff. No new non construction related employment opportunities would be directly or indirectly induced by implementation of the Project. Therefore, no impact to population growth would result.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

No housing currently exists within the Project Area; therefore, no people or housing units would be displaced necessitating the construction of replacement housing. No impact would result.

5.15 Public Services

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire Protection?				X
Police protection?				X
Schools?				X
Parks?				X
Other public facilities?				X

The Project would result in an overall benefit to public services by updating and replacing aging infrastructure to provide resilience to the City of Trinidad's water system for drought, fire, and conservation.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for public services? (No Impact)

As discussed in Section 5.14, Population and Housing, implementation of the Project would not induce population growth and, therefore, would not require expanded fire or police protection or facilities to maintain acceptable service ratios, response times, or other performance objectives. The Project itself results in an improvement to water access during drought conditions and enhancing firefighting capabilities during drought conditions. The Project improvements would not result in the need to increase staffing, create new hazardous conditions, or result in a modification to the road system that would restrict access for emergency services. The Project would not necessitate any related new or altered public service facilities. Overall, no impact would occur.

5.16 Recreation

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
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

Recreational facilities near the Project Area include Trinidad State Beach, Trinidad Head, Trinidad Harbor, Old Home Beach, and Baker Beach.

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? (No Impact)

The Project proposes no new recreational amenity within Humboldt County. The proposed Project enhancement to drought resilience would not increase use to Trinidad State Beach, Trinidad Head, Trinidad Harbor, Old Home Beach, and Baker Beach, or other recreational facilities or parks. No impact would result.

b) Include or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment? (No Impact)

The construction or expansion of recreational facilities would not be required by the Project or included in the Project. There would be no impact.

5.17 Transportation

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

The water storage tanks are not located on a public roadway; however, the replacements of undersized water lines will be along public roadways. The Project does not include modifications to road network geometry.

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? (Less Than Significant)

The Project does not involve modifications to the City or the Community of Westhaven street network geometry. Construction would result in vehicle trips by construction workers and haul-truck trips for material off-haul and deliveries via Highway 101, Westhaven Drive, Main Street, and Edwards Street. Construction-related traffic would be temporary, would vary on a daily basis, and would be distributed over the course of a workday and work week.

The construction would include a proposed temporary traffic control plan, and if necessary, temporary road closures of up to an hour may occur during construction in accordance with County standards. Therefore, through compliance with local requirements, construction activities would not result in substantial adverse effects or conflicts with the local roadway system. The temporary construction impact on the circulation system would be less than significant.

Once complete, the proposed Project would not significantly increase vehicle traffic and would not increase the area's population or redirect traffic patterns. Since the Project elements that are within public access are underground, the Project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Therefore, a less than significant impact would result.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)? (Less Than Significant)

CEQA Guidelines Section 15064.3, subdivision (b) establishes the criteria for analyzing transportation impacts. This Section determines that, for land use projects, "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. [...] A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project." Cal. Code Regs. tit. 14 § 15064.3.

The OPR Technical Advisory provides various screening criteria related to VMT that quickly identify when a project should be expected to cause a less than significant impact without conducting a detailed VMT study. According to the OPR Technical Advisory, projects that generate fewer than 110 trips per day can be assumed to cause a less than significant transportation impact (OPR 2019). The Project would not create new buildings, new employees, increase

the length of roadway, add new roadways, or increase the number of travel lanes. Operational maintenance is not anticipated to generate additional trips then currently occurs. Therefore, the impact would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (No Impact)

The Project does not propose an alteration in the geometric design of a street or road. The proposed water pipe replacement would be located below ground, and existing conditions along the roadway network would be restored to pre-Project conditions and would therefore not substantially increase potential hazards due to geometric design. There are no changes to land use associated with this Project. No impact would occur.

d) Result in inadequate emergency access? (Less Than Significant with Mitigation)

The proposed Project would require pavement removal and replacement along Westhaven Drive, Edwards Street, Van Wycke Street, and Hector Street. Emergency access to the Project Area already exists from these streets and would continue to exist under the proposed Project during both construction and operation. One-way controlled traffic would be required throughout construction, with full road closures not expected, which would follow City and County requirements for temporary roadway closures including signage and public noticing. Construction would be phased in order to maintain local access to US 101, though lane and/or roadway closures could result in delays for emergency response vehicles.

Since the Project Area is already served by emergency and law enforcement personnel, the proposed Project would not slow or hinder emergency response, would not require additional emergency services, though emergency access though lane and/or roadway closures could result in delays during construction. Following construction, the surrounding area would continue to have emergency access. No operational impact on emergency access would result. The construction impact could be potentially significant. Mitigation Measure TR-1 has been incorporated into the Project to reduce the potential impact to emergency access to a less than significant level.

Mitigation

Mitigation Measure TR-1 would reduce the temporary impact of construction activities on emergency access to a less than significant level by requiring the City and its contractors to have ready at all times the means necessary to accommodate access by emergency vehicles, as well as to notify emergency responders in advance of construction activities.

Mitigation Measure TR-1: Maintain Emergency Access and Notify Emergency Responders

The City shall require contractors to provide adequate emergency access to all properties along the corridor during the construction process. At locations where the access to a nearby property is temporarily blocked, the contractor shall be required to have ready the means necessary to accommodate access by emergency vehicles to such properties, such as plating over excavations. As construction progresses, emergency providers shall be notified in advance of the timing, location, and duration of construction activities and the locations and durations of any temporary lane closures.

With implementation of Mitigation Measure TR-1, any potential impact to emergency access during construction would be less than significant.

5.18 Tribal Cultural Resources

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register of Historic Resources, or in a local register of historic 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 that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1? In applying the criteria set forth in subdivision (c) of the Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.				X

a,b) Cause a substantial adverse change in the significance of a tribal cultural resource? (No Impact)

CEQA requires lead agencies to determine if a proposed Project would have a significant effect on tribal cultural resources. The CEQA Guidelines define tribal cultural resources as: (1) a site, feature, place, cultural landscape, sacred place, or object with cultural value to a California Native American Tribe that is listed or eligible for listing on the California Register of Historical Resources, or on a local register of historical resources as defined in Public Resources Code Section 5020.1(k); or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant according to the historical register criteria in Public Resources Code Section 5024.1(c), and considering the significance of the resource to a California Native American tribe.

Under Assembly Bill (AB) 52, notification letters were sent from the City to the Cher-Ae-Heights Indian Community of the Trinidad Rancheria, the Yurok Tribe, and the Tsurai Ancestral Society on November 2, 2022. These letters provided notification to the tribes about the Project. No response was received by the 30-day deadline of December 2, 2022, and tribal cultural resources were not identified. No impact would result.

5.19 Utilities and Service Systems

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical 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 has 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 State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the 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	

The Project is a public utility project designed to reduce average water system, improve water storage capacity, increase fire resiliency with increased distribution capacity to fire hydrants and resiliency of a new steel storage tank.

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electrical power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less Than Significant)

The Project would result in various reliability improvements to the existing City water supply. The proposed Project does not involve the use or construction of any facilities that would require new water, wastewater, electrical, natural gas, or telecommunications utilities. The Project would replace existing undersized and leaking piping within the Project Area. The Project would not directly or indirectly induce population growth in the community and would not alter the existing amount of water used, moreover it would help ensure future use during drought conditions. Therefore, a less than significant impact would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? (No Impact)

The proposed Project would not create an increased demand for domestic water service. The Project would require relatively small quantities of water during the construction phase (e.g., for dust control and concrete/asphalt applications). The Project's water demands would not be substantial and can be met by existing entitlements and resources. Operationally, the Project would enhance drought resiliency by increasing water storage capacity and replacing undersized and leaking pipes. Therefore, the Project would not result in the need for the construction of new water facilities, or the expansion of existing facilities. There would be no impact.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (No Impact)

The Project does not involve sewerage facilities or wastewater treatment and would not impact existing municipal sewerage infrastructure or result in a demand increase on existing wastewater treatment capacity. No impact would result.

d, e) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less Than Significant)

The solid waste provider in the area is Humboldt Sanitation and Humboldt Waste Management Authority (HWMA). The Project is not expected to generate a significant increase of services for solid waste disposal needs. The proposed Project would generate limited solid waste during construction and no waste during operation. Construction solid waste would include the one-time temporary generation of construction waste associated with the proposed development of the road. Excess soils, aggregate road base, and construction materials would be stored within designated staging areas. Excess materials may be re-used on site as needed, and excess materials would not be stockpiled on-site once the Project is complete. The contractor would haul additional excess materials off site for beneficial re-use, recycling, or legal disposal. Solid waste collected as a part of the Project would be disposed of via Humboldt Sanitation or HWMA. Solid waste produced in the County is trucked to State licensed landfills located in Anderson, California and Medford, Oregon in compliance with local, State, and federal regulations pertaining to solid waste disposal. These facilities have sufficient capacity to serve the Project's solid waste disposal needs; therefore, a less than significant impact is anticipated

5.20 Wildfire

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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 slop instability, or drainage changes?				X

The Project Area includes locations within in a Local Responsibility Area (LRA) and State Responsibility Area (SRA). The Project is not on lands classified as very high fire severity zones. The Project Area is located approximately 8.3 miles from lands classified as a very high fire hazard severity zone (Humboldt County 2022g, 2022h).

a) Substantially impair an adopted emergency response plan or emergency evacuation plan (No Impact)

A review of the Humboldt County Emergency Operations Plan (Humboldt County 2015) and the Tsunami Inundation Map for Emergency Planning – County of Humboldt (CGS 2022) indicates that the proposed Project would not impair emergency response activities nor established evacuation routes. The Project would not block or alter any roads or pedestrian ways within the Project Area. No impact would result.

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? (Less Than Significant)

The Project would be located within the City of Trinidad and the Community of Westhaven, which is a fairly sloped topographical area. Some grassland and other vegetation are present along the Project Area in the City of Trinidad, whereas the area along Westhaven Drive is fairly dense vegetation beyond the road. The vegetated portions could be susceptible to wildfire during Project construction or operation due to accidental ignition. During construction, all hazardous materials and construction equipment would be appropriately used and stored pursuant to all required State and local regulations. During operation, the Project would not house any pollutants within the Project Area that may be released if a wildfire occurred. Furthermore, the Project does not include any structures built for human occupancy. Due to the temporary nature of construction, the minimal amount of pollutants anticipated to be stored during the construction phase, the fact that the majority of the Project is located within an area of “moderate” fire risk with only 14% in “high,” and that the Project does not provide any structures to be used for human occupancy, it is not anticipated to exacerbate wildfire risks and thereby expose users to pollutants. A less than significant impact would result.

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? (No Impact)

Development of the Project elements would not result in a need to expand infrastructure to the Project Area or in the immediate vicinity of the Project. New roads for fire defense, expanded water sources, new power lines, or the development of other utilities would not be required. In fact, the Project would increase water storage capacity, enhancing firefighting capability during drought conditions. No impact would result.

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? (No Impact)

The Project Area is located within a moderate sloped area of topography and no surface waters are located within the Project footprint. If a wildfire were to occur, post-fire slope instability would be unlikely. Furthermore, the drainage of the Project Area is not proposed to change as a result of the Project. Therefore, no impact would result.

5.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less-than-Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Does the project:				
a) 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) 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) Have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?			X	

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? (Less Than Significant Impact with Mitigation)

As evaluated in this IS/MND, the Project would not 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; reduce the number or restrict the range of an endangered, rare, or threatened species; or eliminate important examples of the major periods of California history or prehistory.

Mitigation measures are listed herein to reduce impacts related to air quality, biological resources, energy, cultural resources, geology, and transportation. With implementation of the required mitigation measures, impacts would be less than significant.

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)? (Less Than Significant)

Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts" (CEQA Guidelines Section 15355). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. As discussed in Section 5.11 (Land Use and Planning), the Project is consistent with the goals and policies of the Trinidad Area Plan, the City of Trinidad General Plan, and the Humboldt County General Plan.

Table 5.21-1 provides a list of past, present, and reasonably foreseeable future projects within and near the Project Area in the City of Trinidad and the Community of Westhaven, including a brief description of the projects and their anticipated construction schedules (if known). Single-family homes and other similar small-scale uses were not

included because of their negligible cumulative effects. Efforts to identify cumulative projects included outreach to the Humboldt County Planning Department, Caltrans, Humboldt County Department of Public Works, Westhaven Community Services District (WSD), and the City of Trinidad Department of Public Works. Identified projects are summarized in Table 5.21-1.

Table 5.21-1 Projects Considered for Cumulative Impacts

Agency	Project	Summary	Construction Year
City of Trinidad	City of Trinidad HSIP Cycle 10 Project	The project will enhance pedestrian routes and roadway safety to and from core municipal centers, maintaining existing roadways and pedestrian facilities	Construction expected summer 2023
City of Trinidad	Trinidad Community Coastal Resilience Planning Project	The project will develop the Trinidad Community Coastal Resilience Action Plan for the benefit of its coastal and marine ecosystems, coastal economy, visitors, and local residents.	Unknown
Caltrans	Trinidad CAPM	Pavement rehabilitation in Humboldt County in and near Trinidad from 1.3 miles south of School Road Overcrossing to 0.4 mile north of Big Lagoon Bridge.	Under construction. Completion expected on 3/21/2023
Caltrans	Hum-101 Drainage North	Drainage system restoration near Alton from 0.3 mile south of Van Duzen River Bridge #4-17 to Del Norte county line.	Construction expected summer 2023
Caltrans	Trinidad Rancheria Access Project	Improving vehicular access to the Trinidad Rancheria from Highway 101.	Construction expected summer 2024
WCSD	DWR Multi Benefit Project	The creation of an emergency intertie for drinking water with the WCSD from the Trinidad city water plant at 1313 North Westhaven Drive to 980 South Westhaven Drive.	Construction expected summer 2023

The impacts associated with the proposed Project analyzed in this IS/MND would not add appreciably to any existing or foreseeable future significant cumulative impact, such as visual quality, cultural resources, biological, traffic impacts, or air quality degradation. Incremental impacts, if any, would be negligible and undetectable. Any applicable cumulative impacts to which this Project would contribute would be mitigated to a less-than-significant level. Incremental impacts, if any, would be very small, and the cumulative impact would be less than significant. Because the proposed Project would not result in significant impacts after mitigation the proposed Project would not contribute to any significant cumulative impacts which may occur in the area in the future. Therefore, the impact would be less than significant.

c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly? (Less Than Significant)

The Project has been planned and designed to avoid significant environmental impacts. As discussed in the analysis throughout Section 7 of this IS/MND, the Project would not have environmental effects that would cause substantial adverse direct or indirect effects on human beings. The Project would also enhance the firefighting capability for the City of Trinidad and the Community of Westhaven, which would benefit human safety. The impact would be less than significant.

6. References

Archaeological Research and Supply Company (ARSC). 2022. A Cultural Resources Investigation of the Trinidad Drought Relief Project Final Report. CONFIDENTIAL

Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Air Quality Guidelines.

BAAQMD. 2022. Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. April.

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. Accessed June 2022. Available at https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

California Department of Toxic Substances Control (DTSC). 2022. EnviroStor Hazardous Waste and Substances Site List (Cortese). Accessed: June 2022. https://www.envirostor.dtsc.ca.gov

California Environmental Protection Agency (Cal/EPA). 2022. List of Active CDO and CAO from Water Board. https://calepa.ca.gov/sitecleanup/corteselist/. Accessed: March 2022.

California Geological Survey (CGS). 2022. Tsunami Inundation Map for Emergency Planning – County of Humboldt.

California Geological Survey (CGS). 2022. Earthquake Zones of Required Investigation (Trinidad, Westhaven, and Regional Maps). Accessed: November 2022. https://maps.conservation.ca.gov/cgs/EQZApp/app/

City of Trinidad. 1978. City of Trinidad General Plan.

City of Trinidad. 2014. City of Trinidad Emergency Operations Plan.

Department of Water Resources (DWR). 2020. Sustainable Groundwater Management Act 2019 Basin Prioritization.

Humboldt County. 2015. Emergency Operations Plan, Humboldt Operational Area. Humboldt County, CA https://humboldtgov.org/DocumentCenter/View/51861/Humboldt-County-Emergency-Operations-Plan-2015

Humboldt County. 2017. Humboldt County General Plan.

Humboldt County. 2022a. Humboldt County WebGIS. Layers Accessed: Zoning. Accessed: June 2022. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County. 2022b. Humboldt County WebGIS. Layers Accessed: Current General Plan Land Use. Accessed: June 2022. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County. 2022c. Humboldt County WebGIS. Layers Accessed: Coastal Zone Boundary. Accessed: June 2022. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County. 2022d. Humboldt County WebGIS. Layers Accessed: FEMA Flood Zones. Accessed: June 2022. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County. 2022e. Humboldt County WebGIS. Layers Accessed: Tsunami Hazard Area. Accessed: June 2022. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County. 2022g. Humboldt County WebGIS. Layers Accessed: Fire Hazard Severity. Accessed: June 2022. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County. 2022h. Humboldt County WebGIS. Layers Accessed: Cal Fire SRA. Accessed: June 2022. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County. 2022i. Humboldt County WebGIS. Layers Accessed: Seismic Safety. Accessed: January 2023. https://webgis.co.humboldt.ca.us/HCEGIS2.0/

Humboldt County Planning and Building Department. 2015. Northern Humboldt Seismic Safety Map.

North Coast Unified Air Quality Management District (NCUAQMD). 2022. Planning & CEQA. Website: https://www.ncuaqmd.org/planning-ceqa. Accessed November 9, 2022.

Office of Planning and Research (OPR). 2019. Technical Advisory on Evaluating Transportation Impacts in CEQA. December. Available online at: https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

Redwood Coast Tsunami Work Group (RTCWG). 2022. Cape Mendocino Earthquakes 1992. Accessed: November 2022. Website: https://rctwg.humboldt.edu/capemendo92#geology

Streamline Planning Consultants (Kristin Martin). 2007. Geologic and Seismic Characteristics of Trinidad, CA.

Sacramento Metropolitan Air Quality Management District (SMAQMD). 2021. CEQA Guide. Available at: https://www.airquality.org/residents/ceqa-land-use-planning/ceqa-guidance-tools

United States Census Bureau (US Census). 2020. American Community Survey. Accessed on August 18, 2022. Retrieved from: https://data.census.gov/cedsci/map?q=Trinidad%20city,%20California&g=1600000US0684385&layer=VT_2020_160_00_PY_D1&mode=selection&loc=41.0380,-124.0992,z12.0812

United States Department of Agriculture Natural Resources Conservation Service (NRCS). 2022a. Web Soil Survey Trinidad Project Area. Accessed: October 2022. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

United States Department of Agriculture Natural Resources Conservation Service (NRCS). 2022b. Web Soil Survey Westhaven Project Area. Accessed: October 2022. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx

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Appendices

Appendix A

Figures

Appendix B

Mitigation, Monitoring, and Reporting Program

Appendix C

CalEEMod Modeling Information and Results

Appendix D

Biological Resources Report

Appendix E

Wetland Delineation

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The Power of Commitment