

State Water Resources Control Board

September 5, 2014

Ms. Rebecca Price Hall
Watershed & Grant Coordinator
City of Trinidad
P.O. Box 390
Trinidad, CA 95570

COMMENTS ON DRAFT COMPLIANCE PLAN FOR TRINIDAD HEAD (NO.6) AREA OF SPECIAL BIOLOGICAL SIGNIFICANCE FROM THE CITY OF TRINIDAD

Dear Ms. Hall,

The State Water Resources Control Board (State Water Board) received the Areas of Special Biological Significance (ASBS) draft Compliance Plan from the City of Trinidad dated September 20, 2013. A draft compliance plan is required under section I.A.3.b of Attachment B of the State Water Board's Resolution No. 2012-0012 *Approving Exceptions to the California Ocean Plan for Selected Discharges into Areas of Special Biological Significance, Including Special Protections for Beneficial Uses, and Certifying a Program Environmental Impact Report (General Exception)*. Attachment B in the General Exception contains the *Special Protections for Areas of Special Biological Significance, Governing Point Source Discharges of Storm Water and Nonpoint Source Waste Discharges (Special Protections)*, which describes special conditions required of the discharger.

State Water Board staff has reviewed the draft Compliance Plan and provides the following comments:

1. **Map of storm water runoff:** Section I.A.2.a of the Special Protections requires a map of storm water runoff that highlights the prioritized discharges and describe any structural Best Management Practices (BMPs) already employed or to be employed. Prioritized discharges are those that pose the greatest water quality threat and which are identified to require installation of structural BMPs.

Figure-1 in the draft Compliance Plan includes a map storm water runoff and structural BMPs referenced in the compliance plan. However, it does not highlight prioritized discharges. Please address this requirement in the final Compliance Plan.

2. **Non-authorized non-storm water runoff:** Section I.A.2.b of the Special Protections requires a description of the measures by which all non-authorized non-storm water runoff has been eliminated, how the measures will be maintained over time, and how these measures are monitored and documented.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

The draft Compliance Plan identifies non-authorized non-storm water runoff BMPs and tasks. In the final Compliance Plan, please include how these measures will be maintained over time and how they are monitored and documented.

3. **Compliance and implementation schedule:** Section I.A.3.b requires the submittal of the draft Compliance Plan within 18 months of the effective date of the General Exception. The final Compliance Plan including a schedule for structural controls based on results of the runoff and receiving water monitoring shall be submitted within 30 months from the effective date of the General Exception. Section I.A.3.d stipulates that any structural controls identified in the final Compliance Plan be operational within six years of the effective date.

Staff understands the City of Trinidad has not yet received results from receiving water and core discharge monitoring and these results may change which structural controls are determined to be necessary to comply with the Special Protections. The State Water Resources Control Board has provided the City of Trinidad with a one year extension for submitting the Compliance Plan. The draft Compliance Plan is due September 20, 2014 and the final Compliance Plan is due September 20, 2015. In the final Compliance Plan, please include a description and schedule for any additional projects to be implemented and operational by the compliance deadline of March 20, 2018. If this compliance deadline cannot be met, additional information is required to support an extension. In addition, due to the extension provided to dischargers, please update section I.A.3.b and I.A.3.c of the draft Compliance Plan to reflect the compliance dates referenced in the paragraph above.

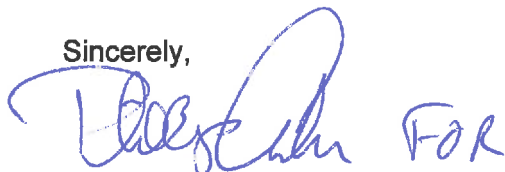
4. **BMPs to address discharge of trash:** Section II.A.5 requires the Compliance Plan to include BMPs that address the prohibition against the discharge of trash to ASBS. Such BMPs shall include measures to ensure that adequate trash receptacles are available for public use and that receptacles are adequately maintained to prevent trash discharges into ASBS.

Table 5 in the compliance plan states that trash receptacles are provided at priority locations and that trash will be removed from street and walk ways. Please include how these trash receptacles will be maintained to prevent the discharge of trash into the ASBS in the final Compliance Plan.

Staff appreciates the efforts of the City of Trinidad on the draft Compliance Plan and will continue to collaborate to resolve the comments mentioned in this letter as needed. Within 30 days from the date of this letter, please submit the final Compliance Plan addressing these comments for approval by the State Water Board Executive Director.

For further questions pertaining to this subject matter, please contact Dr. Maria de la Paz Carpio-Obeso, Ocean Unit Chief, at (916) 341-5858 or MarielaPaz.Carpio-Obeso@waterboards.ca.gov.

Sincerely,



Victoria A. Whitney, Deputy Director
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Cc:

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