



City of Trinidad

Draft ASBS COMPLIANCE PLAN

**As specified in the Special Conditions (Specific Provisions)
for Traditional Small MS4 ASBS Discharges**

Phase II Small MS4 General Permit
NPDES General Permit No. S000004
Order No. 2013-0001-DWQ - Attachment C

September 20, 2014

[Addressing SWRCB 9-5-14 comment letter]

Prepared by

**City of Trinidad
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Introduction

This ASBS Compliance Plan has been developed to comply with the Special Conditions for Traditional and Non-Traditional Small MS4 ASBS Discharges. The City of Trinidad, a Traditional Small MS4 Permittee because the City discharges to an ASBS (as listed in Attachment D), was granted an exception to the Ocean Plan on March 20, 2012 and shall comply with the following Special Protections requirements: Special Protections for Areas of Special Biological Significance, Governing Point Source Discharges of Storm Water and Nonpoint Source Waste Discharges (Attachment B to State Water Board Resolution 2012-0001) (Special Protections).

In 1974 the kelp beds offshore of Trinidad Head were designated by the State of California as an Area of Special Biological Significance, or ASBS. This rectangle of nearshore ocean surrounds Trinidad Head includes Trinidad Bay to the east and State Beach (to the northwest). Trinidad Head and other rock outcroppings form the sheltered open-ocean bay, which supports diverse marine life including (to name a few) giant kelp and other algae, harbor seals, sea lions, river otters, marine birds, fish, and invertebrates such as crab and mussels.

Trinidad is a small city located on the coast adjacent to Trinidad Bay and ASBS. The importance of Trinidad Bay to Trinidad area residents, businesses, visitors cannot be overstated. Since time immemorial, Trinidad Bay has contributed to the quality of life and livelihoods of the Yurok people, Tsurai village residents and more recent settlers. The bay provides a range of values and beneficial uses to this marine dependent community. Trinidad Bay, the adjacent waters and coastal areas are central to the cultural and economic life of the community. Trinidad Bay supports subsistence harvesting of fish, seaweed and shellfish, recreational and commercial fishing. Trinidad Bay and the nearby coastal areas provide recreational opportunities for residents and visitors including enjoying the beach, surfing, kayaking and other boating activities, sightseeing, hiking, wildlife viewing and diving. The local elementary school, Humboldt State University, the Telonicher Marine Laboratory, Central and Northern California Ocean Observing System (CenCOOS) and others benefit from the opportunities provided by Trinidad Bay for educational and research activities. There are many hospitality businesses, suppliers and services that are indirectly benefiting from Trinidad Bay. Trinidad community members care about maintaining the scenic beauty and health and vitality of the Trinidad Bay, the City and the coastal watersheds.

The City of Trinidad has approximately 350 residents, and a total of 5 full-time and 2 part-time staff. There is an active Trinidad Bay Watershed Council, whose mission is “is to work collaboratively to improve and maintain the watersheds, coastal waters, communities in the Trinidad and Westhaven area and to make decisions based on data and sound science, rather than unexamined assumptions, for the benefit of all community members.” The City and a group of partners have been active since 2005 in efforts to comply with the California Ocean Plan and related requirements. These partners, the “Regional Water Management Group” went through an integrated coastal watershed management planning process to develop the Trinidad-Westhaven Integrated Coastal Watershed Management Plan (ICWM Plan), completed and adopted by the City in 2008. That plan is available on the city website. The city is making an earnest effort with very limited resources to comply with the ASBS Special Protections and the MS4 Permit requirements. The City is an active member of the North Coast Stormwater Coalition (NCSC), whose goal is “to reduce stormwater pollution in local streams, rivers, Humboldt and Trinidad Bay and the ocean through public education and outreach, coordinating pollution prevention efforts and implementing pollution control measures.”

The Special Protections for Areas of Special Biological Significance require submittal of an ASBS Compliance Plan to be included in a SWMP. However, SWMPs are no longer required for submittal by this Order. As such, the City shall submit a stand-alone ASBS Compliance Plan. The following pages outline the requirements as specified in the Special Protections as well as the City's plan for meeting these requirements.

I. PROVISIONS FOR POINT SOURCE DISCHARGES OF STORM WATER

The following terms, prohibitions, and special conditions (hereafter collectively referred to as special conditions) are established as limitations on point source storm water. These special conditions provide Special Protections for marine aquatic life and natural water quality in Areas of Special Biological Significance (ASBS), as required for State Water Quality Protection Areas pursuant to California Public Resources Code Sections 36700(f) and 36710(f). These Special Protections are adopted by the State Water Board as part of the California Ocean Plan (Ocean Plan) General Exception.

PERMITTED POINT SOURCE DISCHARGES OF STORM WATER

1) General Provisions for Permitted Point Source Discharges of Storm Water

a. Existing storm water discharges into an ASBS are allowed only under the following conditions:

- (1) The discharges are authorized by this Order;*

- (2) The discharges comply with all of the applicable terms, prohibitions, and special conditions contained in the Special Protections as laid out in this Attachment; and*

- (3) The discharges:*

- (i) Are essential for flood control or slope stability, including roof, landscape, road, and parking lot drainage;*

- (ii) Are designed to prevent soil erosion;*

- (iii) Occur only during wet weather;*

- (iv) Are composed of only storm water runoff.*

b. Discharges composed of storm water runoff shall not alter natural ocean water quality in an ASBS.

c. The discharge of trash is prohibited.

d. Only discharges from existing storm water outfalls are allowed. Any proposed or new storm water runoff discharge shall be routed to existing storm water discharge outfalls and shall not result in any new contribution of waste to an ASBS (i.e., no additional pollutant loading). "Existing storm water outfalls" are those that were constructed or under construction prior to January 1, 2005. "New contribution of waste" is defined as any addition of waste beyond what would have occurred as of January 1, 2005. A change to an existing storm water outfall, in terms of re-location or alteration, in order to comply with these special conditions, is allowed and does not constitute a new discharge.

e. Non-storm water discharges are prohibited except as provided below:

- 1) The term "non-storm water discharges" means any waste discharges from a municipal separate storm sewer system (MS4) or other NPDES permitted storm drain system to an ASBS that are not composed entirely of storm water.*

I.A.2) The following non-storm water discharges are allowed, provided that the discharges are essential for emergency response purposes, structural stability, slope stability or occur naturally:

- (i) Discharges associated with emergency firefighting operations.*
- (ii) Foundation and footing drains.*
- (iii) Water from crawl space or basement pumps.*
- (iv) Hillside dewatering.*
- (v) Naturally occurring groundwater seepage via a storm drain.*
- (vi) Non-anthropogenic flows from a naturally occurring stream via a culvert or storm drain, as long as there are no contributions of anthropogenic runoff.*

I.A.3) Discharges from utility vaults and underground structures to a segment of the MS4 with a direct discharge to an ASBS are permitted if such discharges are authorized by the General NPDES Permit for Discharges from Utility Vaults and Underground Structures to Surface Water, NPDES No. CAG 990002. Other short-duration, intermittent non-storm water discharges related to utilities (e.g. groundwater dewatering, potable water system flushing, hydrotest discharges) to a segment of the MS4 with a direct discharge to an ASBS are permitted if such discharges are authorized by an NPDES permit issued by the relevant Regional Water Board. A Regional Water Board may nonetheless prohibit a specific discharge from a utility vault or underground structure or other specific utility-related discharge if it determines that the discharge is causing the MS4 discharge to the ASBS to alter natural ocean water quality in the ASBS. Additional non-storm water discharges to a segment of the MS4 with a direct discharge to an ASBS are allowed only to the extent the relevant Regional Water Board finds that the discharge does not alter natural ocean water quality in the ASBS.

This provision does not supersede the authority of the MS4 to effectively prohibit a non-storm water discharge that has been found to alter natural ocean water quality in the ASBS.

4) Authorized non-storm water discharges shall not cause or contribute to a violation of the water quality objectives in Chapter II of the Ocean Plan nor alter natural ocean water quality in an ASBS.

2. ASBS Compliance Plan

This draft ASBS Compliance Plan (Plan) specifically addresses the prohibition of non-storm water runoff and the requirement to maintain natural water quality for storm water discharges to an ASBS. This version of the Plan addresses comments from the SWRCB Division of Water Quality received September 8, 2014. The ASBS Compliance Plan is subject to approval by the Executive Director of the State Water Board.

2. a. ASBS Compliance Plan Map

The ASBS Compliance Plan shall include a map, and a procedure for updating the map and plan when changes are made to the storm water conveyance facilities. When changes are made to the stormwater conveyance facilities, the city engineer, upon completion of the record drawings, will update the ASBS Compliance Plan and map. The Figure 1 ASBS Compliance Plan map (separate document) includes a map of surface drainage of storm water runoff showing:

1) Areas of sheet runoff: the map shows the sub watersheds and arrows indicating runoff direction. The permit boundary is the current extent of the stormwater system drainage. With completion of the planned stormwater system improvements, the boundary will be updated to reflect the changes in the stormwater system drainage area.

2) Prioritized discharges are those that pose the greatest water quality threat and which are identified to require installation of structural BMPs: The city's single stormwater outfall is designated as #TR1032 and discharges into the ASBS. TR1032 is designated by SWRCB as a priority discharge. This is shown on the map.

3) Description of any structural Best Management Practices (BMPs) already employed and/or BMPs to be employed in the future: The map shows structural BMPs that were installed in 2014. Additional structural BMPs are in the planning stages to reduce or eliminate the stormwater discharge outfall into the Trinidad Head ASBS; however implementation is dependent on securing funding.

- (a) Stormwater System Improvements installed in 2014 on Trinity, Ocean and West Streets;
- (b) Future Stormwater System Improvements (assuming grant funding is secured) will be proposed for installation on Edwards and other areas to infiltrate the MS4 stormwater.

4) Storm water conveyances in relation to other features such as

- (a) **Service areas:** There are no service areas within the stormwater system drainage.
- (b) **Sewage conveyances and treatment facilities:** There is no sanitary sewer system. All development in and around the city has onsite wastewater treatment systems (OWTS). Results of a recently completed groundwater study indicate it is highly unlikely that OWTS in the MS4 drainage area would discharge waste to the city's stormwater system due to the fact that the soils are deep and sandy, with a deep water table. Water (and wastewater) infiltrates quickly rather than flowing on the surface. Planned LID installations (all within the city rights of way) have appropriate separation from the treatment zones and groundwater levels.
- (c) **Landslides, areas prone to erosion:** There are bluffs to the south and west between the city and the beach, but these areas are not within the stormwater system drainage.
- (d) **Waste and hazardous material storage areas:** The single hazardous material storage area within the permit boundary is the HSU Telonicher Marine Laboratory. The Marine Lab is regulated under a separate discharge permit. Two restaurants and a seafood business could be assumed to have waste storage areas.

Please Note: The Figure 1 Compliance Plan Map will be updated before January 2015. The City is in the process of developing the new map which incorporates the recently completed Stormwater System Improvements. Figure 2 below addresses the SWRCB Comment 1 to highlight the prioritized stormwater discharge, TR 1032.

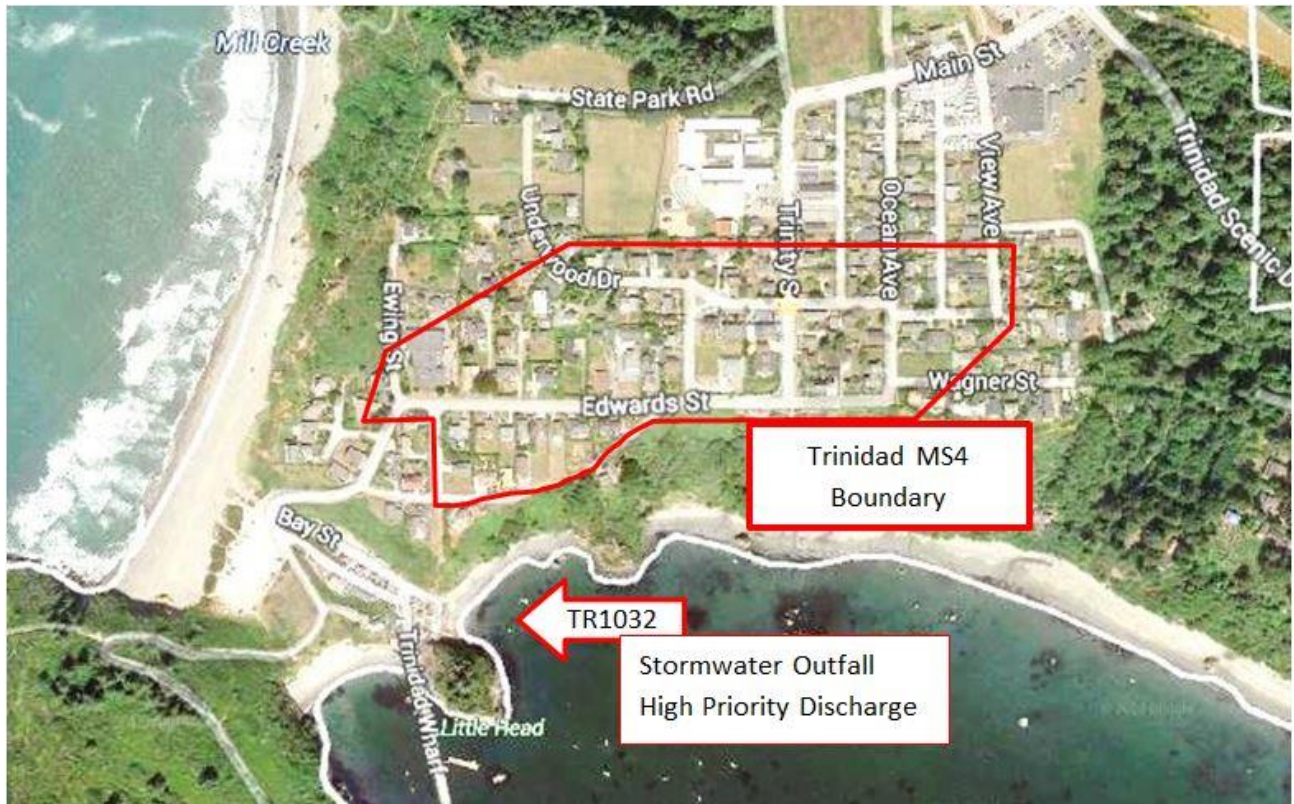


Figure 2: Trinidad MS4 drainage boundary and priority discharge

2. b. Non-Authorized Non-Stormwater Runoff Elimination Measures

The Plan describes the measures by which all non-authorized non-storm water runoff (e.g., dry weather flows) have been eliminated, how these measures will be maintained over time, and how these measures are monitored and documented.

The City is implementing a variety of measures to eliminate all non-authorized non-storm water runoff over the course of the 5 –year permit period, July 2013 – June 2018, generally following the implementation schedule for the MS4 Phase II permit. City staff and/or consultants will be assigned tasks, as appropriate in order to implement, maintain, monitor and document these measures over time. The specific measures and tasks for this section 2. B. *Non-Authorized Non- Stormwater Runoff Elimination Measures* are detailed in Table 1 BMPs and Implementation Schedule. The City’s MS4 Phase II Permit Guidance Document and Permit Tracking sheet will provide the structure needed to ensure that practices are implemented, maintained, tracked and documented.

2. c. Inspections

Minimum inspection frequencies are as follows:

- 1) The minimum inspection frequency for construction sites shall be weekly during rainy season (Construction Site Inspection & Enforcement, Permit Element E.10.c.);*
- 2) The minimum inspection frequency for industrial facilities shall be monthly during the rainy season: not applicable (IDDE Illicit Discharge Source/Facility Inventory E.9.b);*
- 3) The minimum inspection frequency for commercial facilities (e.g., restaurants) shall be twice during the rainy season (IDDE Illicit Discharge Source/Facility Inventory E.9.b);*

4) Storm water outfall drains equal to or greater than 18 inches (457 mm) in diameter or width shall be inspected once prior to the beginning of the rainy season and once during the rainy season and maintained to remove trash and other anthropogenic debris (IDDE Outfall Mapping E.9.a).

2. d. Storm Water Discharges

This section addresses storm water discharges (wet weather flows) and describes how pollutant reductions in storm water runoff, that are necessary to comply with these special conditions, will be achieved through BMPs. BMPs to control storm water runoff discharges (at the end-of-pipe) during a design storm shall be designed to achieve on average the following target levels:

- 1) Table B Instantaneous Maximum Water Quality Objectives in Chapter II of the Ocean Plan; or*
- 2) A 90% reduction in pollutant loading during storm events, for the Permittee's total discharges. The baseline for the reduction is the effective date of the Exception. The baseline for these determinations is the effective date of the Exception, and the reductions must be achieved and documented within six (6) years of the effective date.*

ASBS water quality monitoring results for the City's stormwater and ASBS ocean receiving water, conducted by the City in May 2006, and during the wet seasons 2011-12, 2012-13 and 2013-14, indicated achievement of the Table B. Instantaneous Maximum Water Quality Objectives in Chapter II of the Ocean Plan. The City has conducted its ASBS monitoring. The 2013-14 toxicity testing results were negative for both the City's stormwater (core monitoring) and ocean receiving water. "Natural Water Quality" for the North Coast has now been defined based on reference site monitoring results. Analysis of the Trinidad Head ASBS monitoring results indicates there were exceedances for some constituents based on the preliminary natural water quality guidelines. The City will continue the BMPs currently in place to maintain the water quality objectives. In general, the City's approach is to control the sources of pollutants when practical through implementation of the MS4 Phase II Permit Program. The City is in the process of Structural BMPs through completing upgrades to the MS4 which will disconnect the MS4 draining the upper part of the City from the ASBS Discharge TR1032. The specific measures and tasks for this section *2.d Stormwater Discharges* are detailed in Table 1 BMPs and Implementation Schedule.

2. e. Erosion Control and Anthropogenic Sedimentation Prevention

The City will address erosion control and the prevention of anthropogenic sedimentation in ASBS through implementation of the MS4 Phase II Permit Program, primarily through education and outreach BMPs. The specific measures and tasks for this section *2.e Erosion Control* are detailed in Table 1 *BMPs and Implementation Schedule*.

2. f. Non-Structural and Structural BMPs

The City is currently employing a variety of non-structural BMPs and is considering additional non-structural BMPs for the future. The specific measures and tasks for this section *2.f. Non-structural bmps* are detailed in Table 1 *BMPs and Implementation Schedule*. The City's stormwater discharge into the Trinidad ASBS is a priority, high threat discharge. The City intends to eliminate this discharge from the ASBS completely. LID practices will be implemented wherever possible before using other structural BMPs. The City has successfully used LID several times in the past, is currently completing construction of LID improvements to the MS4 and has conceptual plans for additional LID projects to be implemented when funding can be obtained.

Major improvements to the City's stormwater management system are on track for completion by the end October 2014. These improvements are reducing the quantity of stormwater entering the stormwater

system through constructing LID facilities that treat and infiltrate stormwater flows in the upper part of the City rather than collecting and discharging into the ASBS. These improvements will also reduce the area draining to the stormwater system and discharging into the ASBS.

Additional details about specific measures for this Section 2.f. Structural BMPs are included in Table 1 *BMPs and Implementation Schedule*.

g. BMPs & Implementation Schedule

The Best Management Practices and implementation schedule is designed to ensure that natural water quality conditions in the receiving water are achieved and maintained through a combination of disconnecting the MS4 from the ASBS discharge where possible, reducing flows from impervious surfaces and reducing pollutant loading.

1. Structural LID efforts to eliminate discharge via infiltration are underway. Once completed, these measures are effectively permanent and will not require tracking.
2. Until that goal is achieved, the City shall provide an annual update on the current status of the City’s BMPs. This will take the form of an updated version of Table 1 in this report, and will include a summary of the implementation of each BMP over the prior year, and to date under these permits.
3. In order to compile the necessary information for this annual update, City Staff will maintain an ongoing file documenting the completion of BMPs. Examples include site inspection forms, outreach meetings and materials, and sign in sheets and training materials for staff and Site Operator trainings.

Table 1 BMPs and Implementation Schedule						
BMPs and Tasks	MS4 Permit Element	Implementation Dates & Current Status	Special Protections Section 2.b eliminate non-authorized non-storm water discharge 2.c. Inspections 2.d Stormwater discharges 2. e. Erosion & Sediment Control			
Non-Structural BMPs (section 2.f)			2.b.	2.c.	2.d.	2. e
Work with partners to implement the <i>Trinidad-Westhaven Integrated Coastal Watershed Management Plan</i> as funding allows.	E.7.a E.8 E.12.k	Ongoing. Adopted June 2008				
Develop and implement Stormwater Discharge Enforcement Response Plan	E.6.c	Implement in 2016				
Develop & Implement Comprehensive Education & Outreach Program	E.7.a	Implement in 2015				
Conduct Staff & Site Operator Trainings (with NCSC):		Beginning 2014				
<ul style="list-style-type: none"> • IDDE Training for city staff that would in the course of their duties observe illicit discharges. • Construction Outreach & Education training Staff • Construction Site Operator training • Pollution Prevention & Good Housekeeping staff training 	E.7.b.1 E.7.b.2.a E.7.b.2.b E.7.b.3	Yearly Annual Periodic Biennial				

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Hold Trinidad-Westhaven community meetings to educate and inform the public about the ASBS, water quality issues, watershed plan projects and how to prevent water pollution and discharge of trash to the ASBS.	E.7.a E.8	Ongoing, beginning June 2006				
Encourage use of LID features to capture and treat pollutants on site.	E.7.a(g)	Beginning in February 2008				
Stormwater Program Public Involvement & Participation	E.8	Started in 2013				
Illicit Discharge Detection & Elimination Program	E.9	Implement Summer 2014				
If illicit, polluted or sediment discharge is detected, contact responsible party to eliminate discharge and follow up as needed with cleanup and abatement.	E.9.d	Ongoing starting in August 2013				
Create and maintain an inventory of all commercial facilities and locations with hazardous materials and update annually. Assess priority areas once during permit term.	E.9.b	Ongoing beginning June 2014				
Spill Response Plan Member of Humboldt & Del Norte Regional Hazardous Materials Response Team (HDN HMRT).	E.9.e	Plan Completed June 2014				
Work regionally with the North Coast Stormwater Coalition (NCSC) to implement comprehensive education & outreach program, conduct surveys and distribute educational brochures and messaging, hold educational public meetings and workshops.	E.7 E.8	Ongoing, starting in July 2011				
Work with NCSC to promote reporting of illicit discharges through the Stormwater Hotline.	E.7.a(h)	Ongoing, starting in July 2011				
Support the Trinidad Elementary School environmental education programs	E.7.a(j)	Ongoing, starting in July 2011				
Support the Trinidad Bay Watershed Council as funding allows.	E.7 E.8	Ongoing, starting in May 2007				
Construction Site Inventory, with annual updates.	E.10.a	Completed in June 2013.				
Construction Plan Review & Approval Procedures, updated as needed	E.10.b	Ongoing, starting July 2013				
Construction Site Inspection & Enforcement Program	E.10.c	Ongoing, beginning prior to July 2013				
Pollution Prevention/Good Housekeeping: Continue policy of not using herbicides or pesticides at city facilities. There are no city facilities where materials are stored within the permit area. Maintain stormwater system. Remove trash from streets and sidewalks. Public Works will provide adequate trash receptacles at priority locations and ensure they are maintained regularly. Consider street sweeping before storm season.	E.11	Ongoing, beginning prior to July 2013				

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Develop and Implement a Post Construction Stormwater Management Program that includes regulations, standards, review processes and enforceable mechanisms.	E.12	Beginning July 2015				
Structural BMPs (Section 2.f)						
Complete upgrades to the stormwater system through the Prop 84 ASBS Trinidad Stormwater Management Improvement Phase I Project.	E.11	Construction completed Fall 2014				
Seek funding for Trinidad Stormwater Management Improvement Phase II for the lower area of the city to reduce or potentially eliminate the City's stormwater discharge.	E.8.f E.11	Ongoing, starting in June 2013				
LID features (for treatment and demonstration) have been installed at various places around the city. There are permeable pavers in the parking area in front of the city offices at 463 Trinity Street. There is a rain garden installed at Azalea and Pacific Streets. The City park and areas around the library and museum include native plant landscaping and a grassy emergency access driveway from Main Street. Additional City LID facilities will be installed as needed when funding allows.	E.7.a(g) E.11.i E.11.j E.12.	LID techniques included in projects when feasible beginning 2008				
Encourage use of LID features to capture and treat pollutants on site.	E.7.a(g)	Beginning in February 2008				

h. Alterations of Natural Ocean Water Quality

If the results of the receiving water monitoring described in Section IV. B. below indicate that the storm water runoff is causing or contributing to an alteration of natural ocean water quality in the ASBS, the Permittee shall submit a report to the State Water Board and Regional Water Board within 30 days of receiving the results.

The City submitted an Exceedance report on October 6, 2014 in compliance with the Special Conditions 2.h listed below:

- 1) The report shall identify the constituents in storm water runoff that alter natural ocean water quality and the sources of these constituents;*
- 2) The report shall describe BMPs that are currently being implemented, BMPs that are identified in the ASBS Compliance Plan for future implementation, and any additional BMPs that may be added to the ASBS Compliance Plan to address the alteration of natural water quality. The report shall include a new or modified implementation schedule for the BMPs.*
- 3) Within 30 days of the approval of the report by the State Water Board Executive Director, the Permittee shall revise its ASBS Compliance Plan to incorporate any new or modified BMPs that have been or will be implemented, the implementation schedule, and any additional monitoring required.*

4) As long as the Permittee has complied with the procedures described above and is implementing the revised ASBS Compliance Plan, the Permittee does not have to repeat the same procedure for continuing or recurring exceedances of natural ocean water quality conditions due to the same constituent.

5) Compliance with this section does not excuse violations of any term, prohibition, or condition contained in the Special Protections.

As required above, the City's Exceedance Report for the Trinidad Bay ASBS, includes an identification of the constituents in storm water runoff, and the sources of the constituents as well as the current and planned BMPs that address the alteration of alteration of water quality. The City will continue to work with the SWRCB to address the water quality issues identified in the exceedance report.

3. Compliance Schedule

a. On the effective date of the Exception, all non-authorized non-storm water discharges (e.g., dry weather flow) are effectively prohibited.

b. Within 18 months from the effective date of the Exception, the Permittee shall submit a written ASBS Compliance Plan to the State Water Board Executive Director that describes its strategy to comply with these special conditions, including the requirement to maintain natural water quality in the affected ASBS. The ASBS Compliance Plan shall include a time schedule to implement appropriate non-structural and structural controls (implementation schedule) to comply with these special conditions.

- *September 20, 2014 - The draft ASBS Compliance Plan was submitted.*
- *October 6, 2014 - The ASBS Compliance Plan addressing SWRCB comments was submitted.*
- *September 20, 2015 - Final ASBS Compliance Plan is due.*

c. Within 18 months of the effective date of the Exception, any non-structural controls that are necessary to comply with these special conditions shall be implemented.

d. Within six (6) years of the effective date of the Exception, any structural controls identified in the ASBS Compliance Plan that are necessary to comply with these special conditions shall be operational.

e. Within six (6) years of the effective date of the Exception, all Permittees must comply with the requirement that their discharges into the affected ASBS maintain natural ocean water quality. If the initial results of post-storm receiving water quality testing indicate levels higher than the 85th percentile threshold of reference water quality data and the pre-storm receiving water levels, then the Permittee must re-sample the receiving water, pre- and post-storm. If after re-sampling the post-storm levels are still higher than the 85th percentile threshold of reference water quality data, and the pre-storm receiving water levels, for any constituent, then natural ocean water quality is exceeded. See attached Flowchart Section C.

f. The Executive Director of the State Water Board may only authorize additional time to comply with the special conditions d. and e., above if good cause exists to do so. Good cause means a physical impossibility or lack of funding.

If a Permittee claims physical impossibility, it shall notify the Board in writing within thirty (30) days of the date that the Permittee first knew of the event or circumstance that caused or would cause it to fail to meet the deadline in d. or e. The notice shall describe the reason for the noncompliance or anticipated noncompliance and specifically refer to this Section of this Exception. It shall describe the anticipated length

of time the delay in compliance may persist, the cause or causes of the delay as well as measures to minimize the impact of the delay on water quality, the measures taken or to be taken by the Permittee to prevent or minimize the delay, the schedule by which the measures will be implemented, and the anticipated date of compliance. The Permittee shall adopt all reasonable measures to avoid and minimize such delays and their impact on water quality.

The Permittee may request an extension of time for compliance based on lack of funding. The request for an extension shall require (for Traditional Small MS4s) a demonstration of significant hardship to Permittee ratepayers, by showing the relationship of storm water fees to annual household income for residents within the Permittee's jurisdictional area, and the Permittee has made timely and complete applications for all available bond and grant funding, and either no bond or grant funding is available, or bond and/or grant funding is inadequate;

II. ADDITIONAL REQUIREMENTS FOR PARKS AND RECREATION FACILITIES

In addition to the provisions in Section I (A) a Permittee with parks and recreation facilities shall comply with the following:

A. The Permittee shall include a section in an ASBS Compliance Plan to address storm water runoff from parks and recreation facilities.

There are no City owned/operated facilities that could contribute waste to stormwater runoff discharging to the ASBS. Neither the City maintained trails nor City's Saunders Park are in the MS4 drainage area. Runoff from City Hall and the adjacent Lin tennis court and fire house no longer discharges to the ASBS. Installation of LID facilities has disconnected the upper area of the City from the MS4 that drains to the ASBS. The following sections are no longer applicable as of August, 2014 due to completion of the Stormwater Improvement Project Phase I. The BMPs were applicable between July 1, 2013 and August 2014.

1. Pollutant sources, including sediment sources, which may result in waste entering storm water runoff.

- Potential pollutant sources at City Hall, the tennis court and Fire House include one trash receptacle and one cigarette butt receptacle and potential sediment from parking lot runoff.

2. BMPs or Management Measures/Practices to be implemented to control soil erosion (both temporary and permanent erosion controls) and reduce or eliminate pollutants in storm water runoff in order to achieve and maintain natural water quality conditions in the affected ASBS.

- Please see Table 1 for BMPs to control soil erosion and reduce or eliminate pollutants in storm water runoff.

3. BMPs or Management Measures/Practices to prevent the discharge of pesticides or other chemicals, including agricultural chemicals, in storm water runoff to the affected ASBS.

- Please see Table 1 for BMPs to prevent the discharge of pesticides or other chemicals, including agricultural chemicals in storm water runoff to the affected ASBS.
- Please note that the city does not use pesticides or other agricultural chemicals on city owned or operated facilities and does not store these chemicals at city owned facilities.

4. BMPs or Management Measures/Practices that address public education and outreach.

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- Please see Table 1 for BMPs that address public education and outreach to ensure the public is informed about preventing pollution in storm water runoff to the Trinidad ASBS.

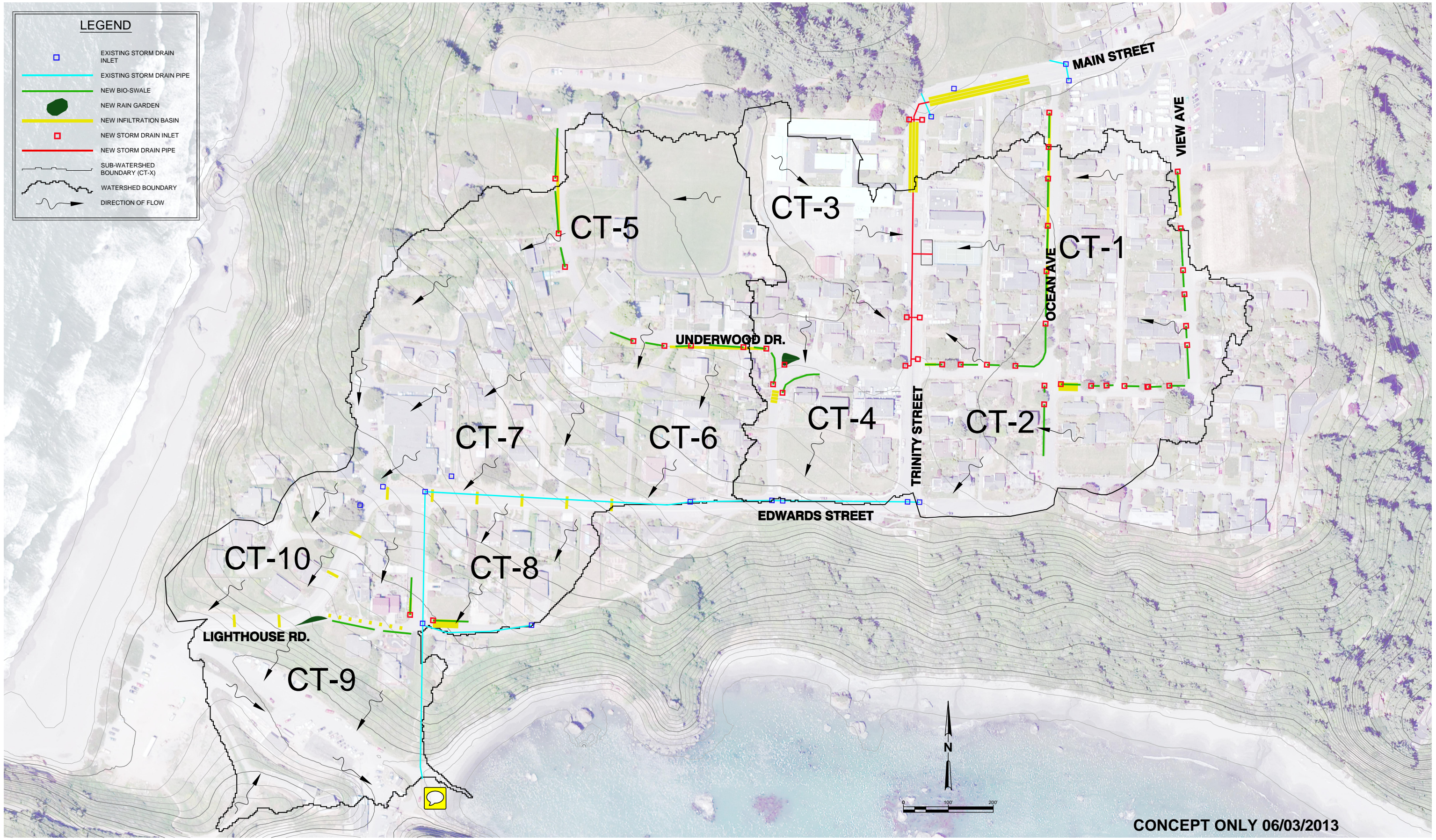
5. BMPs or Management Measures/Practices that address the prohibition against the discharge of trash to ASBS. Adequate trash receptacles are currently and will remain available for public use at visitor facilities, including parking areas. Receptacles are adequately maintained by Public Works to prevent trash discharges into the ASBS. Public Works empties receptacles to prevent overflows and includes covers as needed to prevent trash from being windblown.

- Please see Table 1 for BMPs to address the prohibition against the discharge of trash to the Trinidad ASBS.
- Please see the Trinidad School students' artwork about preventing discharge of trash and other pollutants at:
http://www.blm.gov/ca/st/en/fo/arcata/trinidad_gateway_to/2013_ccnm_art_contest.html

6. BMPs or Management Measures/Practices to address runoff from parking areas and other developed features to ensure that the runoff does not alter natural water quality in the affected ASBS. BMPs include Management Measures and Practices to reduce pollutant loading in runoff to the ASBS through installation of natural area buffers (LID), treatment, and other appropriate measures.

- Please see Table 1 for BMPs to address stormwater discharge from paved and developed areas.

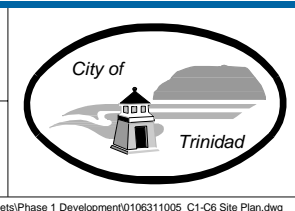
B. Park and recreation facilities maintenance and repairs will be conducted so as to avoid waste discharges to the ASBS.



CONCEPT ONLY 06/03/2013

No	Revision	Note: * indicates signatures on original issue of drawing or last revision of drawing	Drawn	Job Manager	Project Director	Date

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Drafting Check	PS	Design Check	PS
Approved (Project Director)			
Date			
Scale	AS SHOWN		

Client	CITY OF TRINIDAD		
Project	ASBS STORMWATER IMPROVEMENTS PROJECT		
Title	SITE PLAN		
Contract No.	01063-11-005		
Original Size	Ansi D		
Drawing No:	C-001		
Sheet	1	of	15
Rev:			