



AGENDA ITEM 8C

MEETING: March 17, 2021

TO: Humboldt LAFCo Commissioners

FROM: Krystle Heaney, LAFCo Clerk/Analyst

SUBJECT: **City of Trinidad Municipal Service Review and Sphere of Influence Update**
The Commission will review and consider approving the City of Trinidad Municipal Service Review and Sphere of Influence Update. Staff proposes minor changes to the SOI in order to follow parcel lines and designated water service areas. This public hearing is proposed to be continued to receive further information as specified by the commission and allow time for further public input.

BACKGROUND

The Cortese-Knox-Hertzberg Local Government Reorganization Act directs Local Agency Formation Commissions (LAFCOs) to regularly prepare municipal service reviews (MSRs) in conjunction with establishing and updating each local agency's sphere of influence (SOI). The legislative intent of MSRs is to proactively assess the availability, capacity, and efficiency of local governmental services prior to making SOI determinations.

DISCUSSION

The City of Trinidad ("City") is located in Humboldt County, approximately eight miles north of the Arcata-Eureka airport. The City lies along Highway 101 is bordered by the Pacific Ocean to the west. The City covers approximately 417 acres and has not annexed new land since 1983.

Trinidad is governed by a five-member city council whose members are elected at large. The City offers multiple city services including water, stormwater management, parks and recreation, and volunteer fire services. While the City does not have a community wastewater collection and treatment system, it does manage an onsite wastewater treatment system program that oversees individual systems within the City. Fire services are provided by the Trinidad Volunteer Fire Department with significant support from CSA 4 CAL FIRE Trinidad Station during the fire and non-fire season. The nearby Westhaven Volunteer Fire Department also provides aid when needed.

Recently, the City has been working on assessing and improving the stormwater system as well as assessing the water treatment and distribution system. Due to the City's location on the cliffside above Trinidad Bay, stormwater runoff can have a large impact on surrounding natural resource areas such as the bay and also lead to erosion and landslides which may damage City infrastructure and private property. The City has worked to upgrade its stormwater system throughout the City and will continue to encourage low impact development in order to further reduce runoff in the area.

Water resources in the area are limited and more requests for water are being made every year. The City currently obtains water from Luffenholtz Creek and distributes water both inside and outside the City limits. Based on recent studies the City has enough capacity to meet current needs but does not have the current infrastructure to meet full build out of the City and additional requests from the surrounding area. Additionally, due to limited flow data for the creek, it is unknown if the City could exercise its full water rights. Other diversions on the creek and climate change may eventually decrease overall flow on the creek.

Staff has worked closely with City and its contract planners from SHN in order to provide the most up to date information for this MSR. Based on discussions with City staff, LAFCo staff is proposing minor modifications to the City's SOI in order to better follow designated water service subareas in and around the City. Due to the City's limited water supply network and pressures on water supply from outside sources, the SOI will not include the entire expanded water service area as it is not certain the City will be able to provide service to these areas.

Based on discussion and recommendations from Commissioners at the January 20, 2021 regular and public comments received on the Draft MSR, LAFCo staff made revisions as shown in track changes in the attached document. Changes included:

- Updating the median household income for the Westhaven community based on a 2018 income survey conducted for the Westhaven CSD
- Confirming current City Council Members and terms
- Clarifying concerns regarding provision of water and fire/emergency response services to the proposed Trinidad hotel and casino project

RECOMMENDATION

This item has been agendized for consideration as part of a noticed public hearing continued from the January 20, 2021 Regular Commission Meeting. The following procedures are recommended with respect to the Commission's consideration of this item:

- 1) Receive verbal report from staff;
- 2) Open the public hearing and invite testimony (mandatory); and
- 3) Discuss item and – if appropriate – close the hearing and consider action on recommendation:

"I move to adopt Resolution No. 21-06, thereby approving the City of Trinidad Municipal Service Review and Sphere of Influence Update."

Alternative Action:

The commission can move to continue the public hearing to the May 19, 2021 regular meeting in order to make further revisions as deemed necessary.

Attachments

Attachment A: City of Trinidad MSR and SOI Update

Attachment B: Draft Resolution 21-06

City of Trinidad

Municipal Services Review and Sphere of Influence Update



Revised Public Hearing Draft

March 2021



www.humboldtlafo.org

HUMBOLDT LOCAL AGENCY FORMATION COMMISSION

Commissioners:

Virginia Bass, District 4 Supervisor

Mike Wilson, District 3 Supervisor

Stephen Avis, City of Ferndale

Mike Losey, City of Fortuna

Troy Nicolini, Peninsula Community Services District

Debra Lake, Fruitland Ridge Fire Protection District

Ali Lee, Public Member

Alternate Members:

Michelle Bushnell, District 2 Supervisor

Gordon Johnson, City of Rio Dell

David Couch, McKinleyville Community Services District

Skip Jorgensen, Public Member

Staff:

Colette Santsche, AICP, Executive Officer

Krystle Heaney, AICP, LAFCo Analyst/Clerk

Raquel Menanno, Analyst

Jason Barnes, GIS Analyst

Ryan Plotz, Legal Council

Acknowledgements:

LAFCo staff would like to thank the contributors to this Municipal Service Review. Input instrumental in completing this report was provided by Trever Parker, Trinidad City Planner and Sarah West, Associate Planner with SHN Consulting firm.

Table of Contents

1.0	MSR/SOI BACKGROUND	1
1.1	ROLE AND RESPONSIBILITY OF LAFCO.....	1
1.2	PURPOSE OF MUNICIPAL SERVICE REVIEWS	1
1.3	PURPOSE OF SPHERES OF INFLUENCE.....	2
1.4	DISADVANTAGED UNINCORPORATED COMMUNITIES	3
1.5	ORGANIZATION OF MSR/SOI STUDY.....	4
2.0	CITY OF TRINIDAD AGENCY REVIEW.....	5
2.1	OVERVIEW.....	5
2.2	FORMATION AND DEVELOPMENT.....	6
2.3	JURISDICTIONAL BOUNDARY.....	7
2.4	SPHERE OF INFLUENCE	9
2.5	OUT OF AGENCY SERVICES (OAS).....	9
3.0	SOCIOECONOMICS.....	12
3.1	POPULATION AND DEVELOPMENT	12
3.2	LAND USE AND GEOGRAPHIC FACTORS	13
3.3	DISADVANTAGED UNINCORPORATED COMMUNITIES	17
4.0	ACCOUNTABILITY AND GOVERNANCE	20
4.1	GOVERNANCE	20
4.2	ADMINISTRATION.....	20
4.3	ACCOUNTABILITY	21
4.4	SHARED SERVICES AND FACILITIES	21
5.0	CITY SERVICES AND INFRASTRUCTURE.....	23
5.1	SERVICE OVERVIEW	23
5.2	WATER	23
5.3	WASTEWATER – OWTS MAINTENANCE	35
5.4	STORMWATER DRAINAGE SYSTEM	40
5.5	STREETS & ROADWAYS	44
5.6	PARKS & RECREATION	45
5.7	LAW ENFORCEMENT.....	46
5.8	FIRE PROTECTION	46
5.9	EMERGENCY PLANNING	49
5.10	OTHER SERVICE PROVIDERS	50
6.0	FINANCING.....	53
6.1	FINANCIAL OVERVIEW.....	53
6.2	BUDGET	53
7.0	MUNICIPAL SERVICE REVIEW DETERMINATIONS	59
8.0	SPHERE OF INFLUENCE DETERMINATIONS	62

List of Figures

FIGURE 1: CITY OF TRINIDAD OVERVIEW	11
FIGURE 2: CITY OF TRINIDAD ZONING.....	14
FIGURE 3: TRINIDAD WATER SYSTEM LOSS.....	28
FIGURE 4: 2018 TRINIDAD WATER SYSTEM AVERAGE DAILY WATER USE (GPD).....	29
FIGURE 5: TRINIDAD WATER SERVICE SUBAREAS	31

List of Tables

TABLE 1: CITY OF TRINIDAD SUMMARY PROFILE	5
TABLE 2: CITY OF TRINIDAD HISTORIC POPULATION	12
TABLE 3: PUBLIC WATER SYSTEMS IN TRINIDAD AREA	18
TABLE 4: TRINIDAD CITY COUNCIL MEMBERS	20
TABLE 5: AVERAGE AND PEAK (JULY) DAILY WATER USE BY LAND USE ZONE.....	29
TABLE 6: 2018-19 TRINIDAD WATER RATES.....	35
TABLE 7: CITY OF TRINIDAD FIVE YEAR FINANCIAL SUMMARY	55
TABLE 8: STATEMENT OF REVENUE, EXPENDITURES, AND CHANGE IN FUND BALANCES	56
TABLE 9: STATEMENT OF NET POSITION	57

1.0 MSR/SOI BACKGROUND

1.1 Role and Responsibility of LAFCo

Local Agency Formation Commissions (LAFCos) are independent regulatory commissions that were established by the State legislature in 1963 to encourage the orderly growth and development of local governmental agencies including cities and special districts. Today, there is a LAFCo in each of California's 58 counties. Humboldt LAFCo is a seven-member commission comprised of two members of the Humboldt County Board of Supervisors, two City Council members, two Special District representatives, and one Public Member-At-Large. The Commission also includes one alternate member for each represented category.

LAFCo is responsible for implementing the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 ("CKH Act") (California Government Code Section 56000 et seq.) for purposes of facilitating changes in local governmental structure and boundaries that fosters orderly growth and development, promotes the efficient delivery of services, and encourages the preservation of open space and agricultural lands. Some of LAFCo's duties include regulating jurisdictional boundary changes and the extension of municipal services. This includes city and special district annexations, incorporations/formations, consolidations, and other changes of organization. LAFCo seeks to be proactive in raising awareness and building partnerships to accomplish this through its special studies, programs, and actions.

The CKH Act outlines requirements for preparing Municipal Service Reviews (MSRs) for periodic Sphere of Influence (SOI) updates. MSRs and SOIs are tools created to empower LAFCo to satisfy its legislative charge of "discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances (§56301). The CKH Act Section 56301 further establishes that "one of the objects of the commission is to make studies and to obtain and furnish information which will contribute to the logical and reasonable development of local agencies in each county and to shape the development of local agencies so as to advantageously provide for the present and future needs of each county and its communities." SOIs therefore guide both the near-term and long-term physical and economic growth and development of local agencies, and MSRs provide the relevant data to inform LAFCo's SOI determinations.

1.2 Purpose of Municipal Service Reviews

As described above, MSRs are designed to equip LAFCo with relevant information and data necessary for the Commission to make informed decisions on SOIs. The CKH Act, however, gives LAFCo broad discretion in deciding how to conduct MSRs, including geographic focus, scope of study, and the identification of alternatives for improving the efficiency, cost-effectiveness, accountability, and reliability of public services. The

purpose of a MSR in general is to provide a comprehensive inventory and analysis of the services provided by local municipalities, service areas, and special districts. A MSR evaluates the structure and operation of the local municipalities, service areas, and special districts and discusses possible areas for improvement and coordination. While LAFCos have no direct regulatory authority over cities and special districts, MSR's provide information concerning the governance structures and efficiencies of service providers – and may also serve as the basis for subsequent LAFCo decisions. The MSR is intended to provide information and analysis to support a sphere of influence update. A written statement of the study's determinations must be made in the following areas:

- (1) Growth and population projections for the affected area.
- (2) Location and characteristics of any disadvantaged unincorporated communities within or continuous to the sphere of influence.
- (3) Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies.
- (4) Financial ability of the agency to provide services.
- (5) Status of and opportunities for shared facilities.
- (6) Accountability for community service needs, including governmental structure and operational efficiencies.
- (7) Any other matter related to effective or efficient service delivery, as required by Commission policy.

This MSR is organized according to these determinations listed above. Information regarding each of the above issue areas is provided in this document.

1.3 Purpose of Spheres of Influence

In 1972, LAFCos were given the power to establish SOIs for all local agencies under their jurisdiction. As defined by the CKH Act, “‘sphere of influence’ means a plan for the probable physical boundaries and service area of a local agency, as determined by the commission” (§56076). All boundary changes, such as annexations, must be consistent with an agency's sphere of influence with limited exceptions.

Pursuant to Humboldt LAFCo policy, a MSR is conducted prior to or in conjunction with its mandate to review and update each local agency's sphere of influence every five years or as necessary. The municipal service review process is intended to inform the Commission as to the availability, capacity, and efficiency of local governmental services prior to making sphere of influence determinations.

LAFCo is required to make five written determinations when establishing, amending, or updating an SOI for any local agency that address the following (§56425(c)):

- (1) The present and planned land uses in the area, including agricultural and open space lands.

- (2) The present and probable need for public facilities and services in the area.
- (3) The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
- (4) The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.
- (5) For an update of an SOI of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

Service reviews may also contain recommendations for sphere of influence or government structure changes needed to implement positive service changes. Where more detailed analysis of service options is necessary, service reviews may contain recommendations for special studies where there is the potential to reduce service gaps and improve service levels.

1.4 Disadvantaged Unincorporated Communities

SB 244 (Chapter 513, Statutes of 2011) made changes to the CKH Act related to “disadvantaged unincorporated communities,” including the addition of SOI determination number 5 listed above. Disadvantaged unincorporated communities, or “DUCs,” are inhabited territories (containing 12 or more registered voters) where the annual median household income is less than 80 percent of the statewide annual median household income.

Humboldt LAFCo has adopted DUC policy, which identifies 31 inhabited unincorporated “legacy” communities for purposes of implementing SB 244. These legacy communities were defined as part of the Humboldt County 2014 Housing Element for areas not located within the sphere of influence of a city. Therefore, additional review is needed to determine “disadvantaged unincorporated communities” within and adjacent to city spheres of influence. As such, this MSR will document DUCs associated with the City of Trinidad SOI.

CKH Act Section 56375(a)(8)(A) prohibits LAFCo from approving a city annexation of more than 10 acres if a DUC is contiguous to the annexation territory but not included in the proposal, unless an application to annex the DUC has been filed with LAFCo. The legislative intent is to prohibit selective annexations by cities of tax-generating land uses while leaving out under-served, inhabited areas with infrastructure deficiencies and lack of access to reliable potable water and wastewater services. DUCs are recognized as social and economic communities of interest for purposes of recommending SOI determinations pursuant to Section 56425(c).

1.5 Organization of MSR/SOI Study

This report focuses on key issues that may be particularly relevant to the subject agency while providing required LAFCo MSR and SOI determinations. This report provides the following:

- A description of the subject agency;
- Any new information since the last MSR and a determination regarding the need to update the SOI;
- MSR determinations for Commission review; and
- Any other issues that the Commission should consider in the MSR/SOI.

2.0 CITY OF TRINIDAD AGENCY REVIEW

2.1 Overview

Trinidad is one of California's smallest incorporated cities with a 2010 population of 367. Trinidad is a seaside city in Humboldt County, located on the Pacific Ocean 8 miles north of the Arcata-Eureka Airport and 15 miles north of the City of Arcata. Fishing operations related to Trinidad Harbor are vital to both local tourism and commercial fishing interests in the region¹. Trinidad Head, the harbor area, beaches, and the Pacific Ocean are the dominant natural features of the City. Trinidad is governed by a five-member city council whose members are elected at large. Trinidad provides a relatively full range of municipal services and operates its own public works department, public water system and volunteer fire department. All wastewater inside and outside of the city is provided by individual onsite wastewater systems. The last Municipal Service Review was conducted in 2008. This document will serve to update information regarding city services and provide the basis for updating the City's Sphere of Influence (SOI).

Table 1: City of Trinidad Summary Profile

FORMATION	
Agency Name	City of Trinidad
Incorporation Date	November 7, 1870
Enabling Legislation	General Law City, California Constitution, Article 11, Section 2, and California Government Code §34000 et seq.
CONTACT	
Primary Contact	Eli Naffah, City Manager
E-mail	citymanager@trinidad.ca.gov
City Hall	409 Trinity Street, Trinidad, CA 95570
Mailing Address	PO Box 390, Trinidad, CA 95536
Phone	Clerk: 707.677.0223 Manager: 707-677-3876
Website	www.trinidad.ca.gov
GOVERNANCE	
Governing Body	City Council

¹ City of Trinidad website <http://trinidad.ca.gov/>

Council Meetings	Second and fourth Tuesday of every month, 6:00 PM
Meeting Location	Trinidad City Hall, 409 Trinity Street
SERVICES	
Services Provided	Water, Fire Protection, Law Enforcement (contract with Sherriff's office), Streets & Street Maintenance, Stormwater Drainage, Parks & Recreation
Area Served	City Boundary: 417 acres City SOI: 576 acres

2.2 Formation and Development

The City of Trinidad is located within Yurok ancestral territory which includes the Lower Klamath River and the California coast from Little River (south of Trinidad) running north to Damnation Creek (south of Crescent City). Prior to European contact and settlement of the region the largest concentration of occupants was located in the villages along the river, while the total number of houses in the coastal villages was approximately one-third the number in river villages. However, one of the largest Yurok villages was located on the coastal bluffs overlooking Trinidad Bay. This southernmost village known as Tsurai, meaning “mountain” due to its association with Trinidad Head, is unique in that it is located right on a cove protected from the ocean. Moreover, the language spoken at Tsurai is the most divergent dialect from what Yuroks of other villages spoke. Tsurai and the surrounding landscape are places of great significance to Yurok culture as evident in oral histories, ceremonial activities, and subsistence practices that continue to this day.²

In 1848, the discovery of gold inland brought an end to the Yuroks' way of life. A new era of removal and later assimilation were forced onto the Yurok people, along with other tribes in the region. Westernization of the Trinidad area was rapid. The Trinidad Trail, opened in 1850, provided the main communication route between Trinidad and Crescent City. Charles von Luffenholtz established the first lumber mill in the area in 1851. Trinidad became a boom town, port of entry for supply ships, and distribution point for mule trains to the gold fields. Trinidad harbor in turn supported timber export, whaling, and finally commercial and sport fisheries. Trinidad was the third city established in Humboldt County and incorporated on November 7, 1870³. By 1875, the Northern Pacific Telegraph Company had a line in between Trinidad and Petaluma. Telephone service between Trinidad and Eureka was established in November 1883.

The last Yurok brush dance at Trinidad was held in 1908 or 1909. In 1916, Native American residents were forced out of Tsurai. The Trinidad Rancheria was established in 1917 by the

² Tsurai Management Plan, Sloan and Rocha, April 2007.

³ There are some uncertainties about the City's official incorporation date, but it is generally acknowledged that the City's incorporation process was completed by 1872.

Secretary of the Interior, with funding authorizing the purchase of lands under acts of congress June 6, 1906. Today, the Cher-Ae Heights Indian Community of the Trinidad Rancheria is a federally recognized Indian tribe comprised of Yurok, Tolowa, and Wiyot descendants. The Trinidad Rancheria provides social and cultural programs, business enterprises and services for tribal members and operates the Cher-Ae Heights Casino and owns most of the Harbor Area. Also, the Tsurai Ancestral Society has assumed a long term, custodial role for the protection and preservation of the cultural resources associated with Tsurai.

2.3 Jurisdictional Boundary

Trinidad's jurisdictional boundary or "city limits" encompasses approximately 0.65 square miles (417 acres), including a significant area of Trinidad Bay and is almost entirely within Coastal Zone as designated by the California Coastal Commission. The City has recorded only three annexations since 1950. In 1976, the City annexed approximately thirty acres of existing residential uses in the Berry Road area to the northeast of the City boundaries. In 1977, the City completed the annexation of approximately 100 acres of tide and submerged lands in Trinidad Bay. This annexation was desired by the City to allow for exercise of its police powers relative to moorings and other harbor activities. Trinidad Head was annexed and subsequently transferred from the Federal Government to City ownership in 1983.

Future Annexation

The City's General Plan emphasizes the desire to maintain the compact urban form of Trinidad while contemplating the benefits of annexation, including additional land use control and potential increase in property tax revenue. Annexation would allow the City to expand its On-site Wastewater Treatment System (OWTS) program and increase protection of the Trinidad Head Area of Special Biological Significance (ASBS). It has also been suggested that annexation would help increase the population base to support running a city government. One of the main advantages of annexation would be the provision of City services, particularly water. The restrictive nature of the land use policies contained in the Local Coastal Program and anticipated minimal population growth project for the City and adjacent areas would help preserve the community's character even after annexation⁴.

Urban Limit Line

The Humboldt County General Plan designates an Urban Limit Line in the Trinidad Area Plan, which serves as the County's certified Local Coastal Program. An Urban Limit Line is intended to discourage urban sprawl by containing urban development during a specified period, and its location may be modified over time. It is identified and mapped at a suitable scale for all existing developed areas in the Coastal Zone. For the Trinidad area, the Urban Limit Line is also used to delineate potential limits to water service

⁴City of Trinidad Website <https://trinidad.ca.gov/documents>

expansion. The establishment of this line is based on findings that lands included within the Urban Limit would be generally suitable for development at a density greater than one unit per acre with serviced water or one unit per two acres until serviced water is available⁵. According to Section 3.12, Public Works, a serviceable area exists within the Urban Limit Line that includes all parcels within 300 feet by the shortest feasible route of an existing service line with capacity to serve the permitted development of said parcels as indicated in the Area Plan.

Consistent with Section 3.23 of the Trinidad Area Plan, water service may be extended to areas outside of the Urban Limit if it is within the designated service area⁶. The extension policies require that capacity necessary to serve future development within the Urban Limit Line be reserved. A finding to this effect would have to be made by the County before extension of water outside of the Urban Limit Line would be permitted to occur⁷. Additionally, any new development must account for development constraints, accommodate a septic system to support planned residences, and meet the regulatory requirements of the Coastal Act.

Water Service Area

The City has a designated Water Service Area that extends north along Patrick's Point Drive, east along Quarry Road and Mill Creek Lane, and south approximately 2 miles along Scenic Drive and terminating at the city's infiltration gallery at Luffenholtz Creek. The Trinidad Rancheria properties are also within the Water Service Area.

Prior to the year 2000, the City provided water to users within the service area outside City limits when requested, without much oversight or decision-making, which resulted in increased revenue for the City. However, around 2000, the policies of LAFCo changed, no longer allowing service extensions to properties outside the City without annexation, except in cases of public health and safety emergencies. As such, the City stopped connecting users outside City limits with exception of APN 515-241-001 (LAFCo Resolution No. 2010-07, 56133 Exemption for CAL FIRE Station Extension), APN 515-151-063 (LAFCo 56133 Exemption, September 20, 2017), and APN 515-341-003 (LAFCo Resolution No. 2018-03). With exception of the CAL FIRE Extension, the more recent residential connections were found to be consistent with the Trinidad Area Plan and served to resolve historical water service agreements made between the property owners and the city.

During the last drought (2014-2017), the number of requests for City water from property owners outside of the City increased substantially. Water supply has become an important issue with the increasing requests from the City including the Trinidad

⁵ Humboldt General Plan, Volume II, Trinidad Area Plan of the Humboldt County Local Coastal Program, Section 3.23 – Public Services. April 2007.

⁶ Humboldt General Plan, Volume II, Trinidad Area Plan of the Humboldt County Local Coastal Program, Section 3.11 – Urban Limit. April 2007.

⁷ Trinidad Area Plan of the Humboldt County Local Coastal Program. Humboldt County Planning Department. Certified 5-1-83.

Rancheria's request for a substantial amount of water to serve a proposed hotel, as well as increased uncertainties and risks related to climate change.

SHN, the City's contract planning firm, has prepared a build-out demand assessment that includes potential development within the service area, both within and outside of City limits. The City has also analyzed the storage and distribution characteristics and limitations of the physical water system, will be inventorying water rights on Luffenholtz Creek, and assessing potential plant improvements and alternative water sources as part of a broader water security planning effort. These items are discussed further under Section 5.2.

2.4 Sphere of Influence

Current SOI

The City of Trinidad's SOI was first established by LAFCo in 1984 (Resolution No. 84-8). Currently, the SOI encompasses 159 acres beyond the city limits and includes areas north and east of the City limits. It has a total area, including City acreage, of 576 acres⁸. The current water service area is larger than the City SOI.

Proposed SOI

Proposed changes to the SOI include the addition of several parcels directly adjacent to the existing SOI to the north and east of the city, and the removal of one parcel on the northeast edge of the City. These changes are being proposed consistent with the City's priority water service "subareas" A, B, C and D1, which generally represents a more limited area that could be considered for future annexation by the city (see Figure 5). Due to water supply and service constraints, it is not recommended that the entire Water Service Area be included within the SOI at this time.

On behalf of Green Diamond Resource Company (GDRC), LACO Associates requested that APNs 515-261-007 and 515-251-003 be included in the Trinidad MSR update⁹. The properties are located approximately 1 mile north of the city limits, on the west side of State Highway 101 near the CAL FIRE station. The properties are not immediately adjacent to the City boundary or SOI and are outside the City's Water Service Area. As such, these parcels are not recommended for inclusion in the proposed SOI at this time.

2.5 Out of Agency Services (OAS)

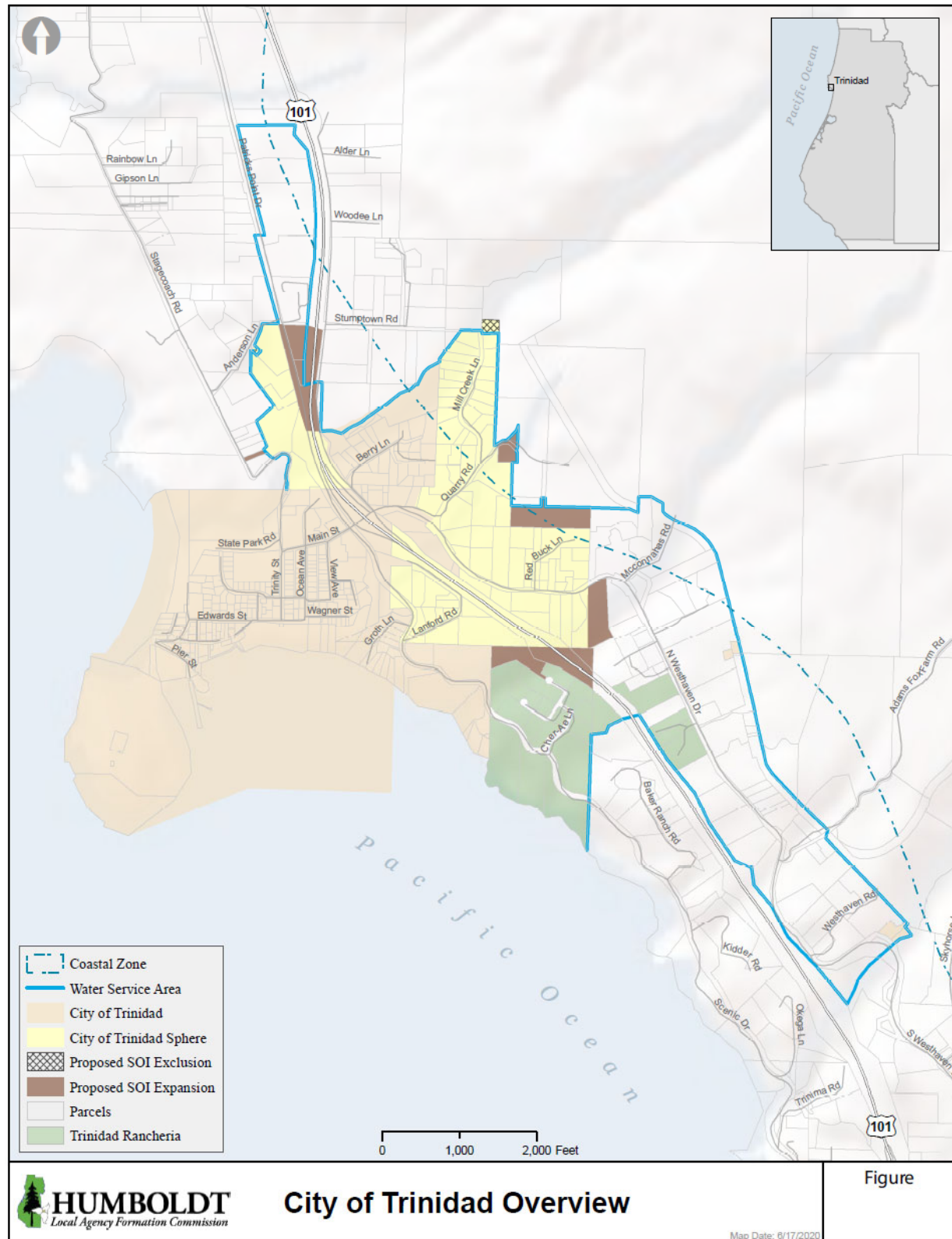
The City of Trinidad currently provides water service to 101 connections outside the city boundary but within the Water Service Area boundary including: 25 connections within the Rancheria (1-Casino, 3-Tribal Offices/Operations, and 21-Residential), and 76 residential connections. These outside agency services are located primarily in the area south of the City along Westhaven Drive and Scenic Drive. It is believed that most of these

⁸ City acreage and SOI areas. Planwest.

⁹ GDRC request for inclusion in Trinidad MSR 2013

parcels were served prior to January 1, 2001, and therefore exempt from LAFCo review and approval. Any future proposals to extend services outside the City's boundary would be subject to LAFCo review and approval pursuant to Government Code Section 56133 and Humboldt LAFCo policy.

Figure 1: City of Trinidad Overview



3.0 SOCIOECONOMICS

3.1 Population and Development

Trinidad has experienced limited population growth since 1960. As can be seen in Table 2, most of the Trinidad's population growth occurred in the period between 1940 and 1980, with fluctuations in growth over the last several decades. According to the American Community Survey (ACS), the 2019 population within city limits is approximately 355 residents¹⁰.

Table 2: City of Trinidad Historic Population

Year	Population	Numerical Change	Percent Change
1880	104	-	-
1930	107	3	3
1940	94	-13	-12
1950	188	94	50
1960	289	101	53
1970	300	11	4
1980	379	79	26
1990	362	-17	-4
2000	311	-51	14
2010	367	56	18
2018	360	-7	-2
2019	355	-5	-1

City staff estimates that the actual annual growth rate over the past 8-10 years in Trinidad has been around 0.15% annually. This number is based on an analysis of new homes built, since the ACS population estimates for such small areas have a high margin of error and have shown a decrease in population since 2010. Therefore, utilizing a 0.15% growth rate and the 2010 Census estimate of 367 people, Trinidad could expect to have a 2020 population of 373 residents and a 2030 population of 378 residents. It is important to note

¹⁰ American Community Survey Annual Estimates of the Resident Population for Incorporated Places in California: April 1, 2010 to July 1, 2019.

that Trinidad largely has an aging population, with 66.9 percent of residents over 45 years of age and 21.4 percent of residents in the family-forming age group (25–44)¹¹.

3.2 Land Use and Geographic Factors

Land Uses

The largest zoning designation within Trinidad is Open Space (OS) which includes Trinidad Head and beachfront areas. Special Environment (SE) uses often occur in riparian and unstable areas, Urban Residential (UR) and Suburban Residential (SR) parcels are also prevalent¹². Other significant uses within the City include: Commercial (C), Planned Development (PD), Visitor Services (VS), and Public and Religious (PR). Urban Residential parcels are concentrated in the City's interior northeast of Trinidad Head. Land uses within the proposed SOI and the designated water service area include Commercial Recreation (CR) along Patrick's Point Drive, Residential Estates (RE) and Rural Residential (RR) east of Highway 101 near Quarry Road and Red Buck Lane, and Unclassified (U) in the Trinidad Rancheria.

Along the eastern boundary, Suburban Residential parcels lie between Mill Creek and Parker Creek. The Highway 101 overpass bisects the eastern one third of town with major arterial and connector roads splitting off into the City's core (Figure 2). The kelp forests surrounding Trinidad Head were designated by the State as an Area of Special Biological Significance (ASBS) in 1974. The ASBS designation is intended to afford special protection to marine life through prohibition of waste discharges within the ASBS area (i.e., zero-discharge standard). The City of Trinidad must consider this designation when considering all projects and development that affect drainage. The City, the Trinidad Rancheria and the Humboldt State University Telonicher Marine Laboratory have all been permitted to discharge stormwater into Trinidad Bay and are required to comply with the California Ocean Plan and special protections for ASBS that require extensive water quality monitoring¹³.

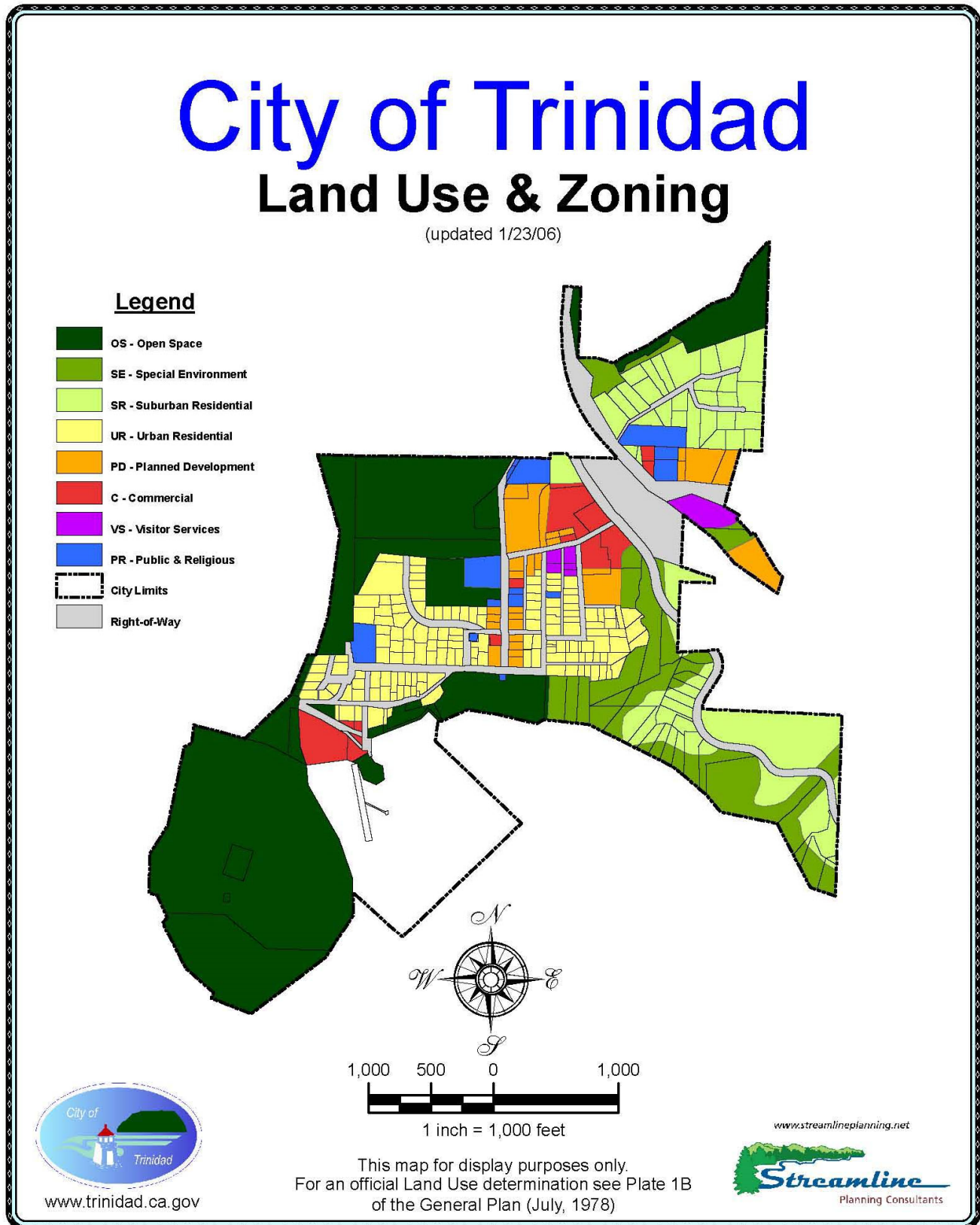
Aside from the existence of three large, currently undeveloped Planned Development (PD) parcels, no non-residential property in the City is available for conversion to residential use. The primary constraints to new residential development in Trinidad are limited septic capability and water availability. Individual onsite wastewater treatment systems (OWTS) are currently the only means of sewage disposal in the City. Much of Trinidad is more densely developed with smaller lots than what would now be considered adequate for OWTS. Fortunately, much of Trinidad has ideal soils for OWTS, but there is documented bacterial contamination in the water around the City. Although the City is managing OWTS and improving water quality, significant increase in development and density in Trinidad is not feasible with the use of OWTS.

¹¹ City Housing Element

¹² *ibid*

¹³ Trinidad Bay Watershed Council <http://www.trinidadwatersheds.org/asbs/>

Figure 2: City of Trinidad Zoning



The City has no industrial or agricultural zones. Most surrounding undeveloped property is within State Park boundaries or is Open Space and unsuitable for development due to geological instability or the existence of sensitive habitat and/ or cultural resources. Largely because of septic-system capability, slope stability constraints and the subdivision of most of the City into urban sized lots prior to zoning and other land use regulations, few previously developed parcels are available for subdivision for the purpose of creating more developable parcels. There are 17 lots that could potentially be subdivided (at least double the minimum lot size/ maximum density). However, for most of these lots, subdivision is unlikely due to the configuration of the existing development and other constraints.

The City is in the process of updating its 1978 General Plan and Local Coastal Program together. The City's Local Coastal Plan implements Coastal Act policies which include review of new development for compliance with design review and view protection findings. Since Trinidad lies almost exclusively within the Coastal Zone, portions of the General Plan serve as the Land Use Plan (LUP) portion of the Local Coastal Program as required by the Coastal Act.

The LCP consists of both an LUP and an Implementation Plan (IP). The IP consists of the zoning and other ordinances and regulations that implement the provisions of the certified LUP, and by extension, policies of the Coastal Act. Though developed in 1976, the City's current LUP was the first in the State to be certified by the Coastal Commission in 1978. The implementation ordinances, which include zoning, building, grading and subdivision, were certified in 1980. The City received an LCP update grant and has completed draft general plan elements and updated ordinances for the IP which are in the process of being reviewed by the Planning Commission and Coastal Commission staff.

Housing

As noted above, there is limited potential for development of housing within the City. As of March 2020, there remained approximately 43 vacant, residentially zoned lots within the city limits¹⁴. City staff estimates the maximum build-out under current land use and zoning would support approximately 91 new housing units. However, this number is conservative and is not likely to occur for several decades due to various development constraints. Many areas include steep slopes and unstable soils. Bluff saturation from imported domestic water and water quality issues related to stormwater and wastewater disposal are a major concern. Any new development must account for these constraints, accommodate a septic system to support planned residences, and meet the regulatory requirements of the Coastal Act.

¹⁴ Housing Element, March 2020.

The City's 2019-2027 Housing Element includes an assessment of the housing vacancy rates, which are used as an indicator of housing supply and demand. In Trinidad, the vacancy rate is estimated to be 43.6 percent as of 2019 with approximately 29.4 percent categorized as seasonal/recreational or occasional use¹⁵. According to City staff, approximately 30 to 32 vacation rentals operate at any given time within city limits, comprising 13 to 14 percent of the city's housing stock. The City has had high vacancy rates for decades due to a prevalence of second/vacation homes, even before vacation rentals were established.

The City recently obtained funding through the California Department of Housing and Community Development's (HCD) SB2 program to develop policies, design standards, plans, and ordinances to help streamline approval of affordable housing¹⁶. As part of the SB2 project, the City will also be updating their ADU ordinance. At this time, it is unknown how ADUs will be regulated in Trinidad; currently, they are not allowed on most parcels due to regulations in the City's LCP and septic limitations. Once an updated ordinance is adopted, the City may see an uptick in ADU applications. If one quarter (generally, ADUs do not exceed 10% of the housing stock, however this is a potentially plausible percentage) of those parcels meeting the minimum lot size to construct ADUs, it would result in 36 new ADUs in city limits. This may potentially help ease housing development issues for the City. High property values and lack of developable land are the primary barriers to affordable housing.

Agricultural Land and Open Space

There are no land designated Agricultural within City limits. The City is extremely coastal, and the environment is dominated by ocean influences. Open space uses within City limits and surrounding the City are extremely important for attracting visitors to the area. The City is a gateway to the California Coastal National Monument (CCNM) at Trinidad Head, which is managed by the federal Bureau of Land Management (BLM). The CCNM provides habitat for marine-dependent wildlife and vegetation on more than 200,000 rocks, islands, exposed reefs, and pinnacles along the California coast as well as 7,924 acres of public land in six onshore units including Trinidad Head¹⁷.

¹⁵ City of Trinidad, 2019-2027 Housing Element, March 2020.

¹⁶ City of Trinidad, City Council Agenda Packet, June 9, 2020.

¹⁷ Bureau of Land Management- California Coastal National Monument <https://www.blm.gov/programs/national-conservation-lands/california/california-coastal>

3.3 Disadvantaged Unincorporated Communities

LAFCo is required to evaluate disadvantaged unincorporated communities (DUCs) as part of this review, including the location and characteristics of any such communities within or contiguous to the Trinidad SOI. A DUC is an unincorporated geographic area with 12 or more registered voters with a median household income of 80% or less of the statewide median household income. The identification of DUCs is intended to ensure that the needs of these communities are met when considering service extensions and/or annexations in unincorporated areas.

The Median Household Income (MHI) for the City of Trinidad was \$76,250 in 2018, which is 107 percent of the statewide median household income of \$71,228¹⁸. The city is therefore not considered a disadvantaged community.

Surrounding Territory

The City of Trinidad is directly adjacent to the Pacific Ocean and redwood forests, both timberland and protected open space areas. The land surrounding the City is all part of a Disadvantaged Community Tract (Number 06023010200), which includes the coastal region between Trinidad and the Del Norte County line, with a population of 2,611 and an MHI of \$48,454, 68 percent of California's reported \$71,228 MHI¹⁹.

Adjacent to the south east edge of the City is the Trinidad Rancheria which qualifies as a disadvantaged community. While this land is under tribal jurisdiction, the community relies on nearby services from the City and Westhaven including emergency medical response and fire protection.

North of Trinidad is the Big Lagoon Census Designated Place (CDP), which has an estimated MHI of \$66,806. This is 94 percent of the estimated California MHI which means the community does not qualify as a DUC.

South of Trinidad is the Westhaven-Moonstone CDP, which has a 2018 American Community Survey MHI estimate of \$63,664²⁰. However, Westhaven CSD conducted a detailed income survey for the District in 2018 that reported a MHI of \$47,000²¹. This is ~~6689~~ percent of California's MHI²². The areaCDP is therefore considered not a disadvantaged unincorporated community.

The City is isolated from other populated areas and has a strong sense of identity that discourages expansion and annexation of surrounding territories. Should territory in surrounding areas be evaluated for annexation, disadvantaged communities in the area

¹⁸ American Community Survey 5-year Estimates (2018), Table S1903 – Median Income in the Past 12 Months, California. Accessed April 5, 2020.

¹⁹ Department of Water Resources Disadvantaged Community Mapping Tool <https://gis.water.ca.gov/app/Fsts/>

²⁰ American Community Survey 5-year Estimates (2018), Table S1903 – Median Income in the Past 12 Months, California. Accessed May 4, 2020.

²¹ Rural Community Assistance Corporation, Westhaven Community Services District Median Household Income Survey – Final Report. Funded by State Water Resources Control Board. May 2018.

²² ~~Department of Water Resources Disadvantaged Community Mapping Tool <https://gis.water.ca.gov/app/dacs/>~~

may be considered further. The City has not formally evaluated disadvantaged communities within or contiguous to its SOI.

Service Providers

Water is provided to the surrounding Trinidad area by onsite wells or via public water systems²³ operating in the Trinidad area. These systems can be classified as “Transient” such as restaurants or campgrounds providing their own potable water source or “Community” that are typically associated with a small water company or mobile home park. A summary of public water systems in the Trinidad area is below.

Table 3: Public Water Systems in Trinidad Area

System #	Name	Site Address	Type	Resident Population	Transient Population	Service Connection
CA1200704	Azalea Glen RV Park	3883 Patrick's Pt Dr.	Transient	10	55	2
CA1200643	Beach Creek Mobile Home Park	3633 Patrick's Pt Dr.	Community	50	0	23
CA1200705	Emerald Forest Cabins & RV	753 Patrick's Pt Dr.	Transient	0	200	1
CA1200831	Larrupin' Cafe	1658 Patrick's Pt Dr.	Transient	0	247	1
CA1200793	Merryman's Restaurant	100 Moonstone Beach Rd.	Transient	0	125	1
CA1200590	Moonstone Heights MWA	716 Fern crest Dr.	Community	31	0	14
CA1200772	Ocean Grove Lodge	480 Patrick's Pt Dr.	Transient	3	50	12
CA1200588	Sea wood Estates MWC	161 Westgate Dr.	Community	60	0	23
CA1200728	Sounds of the Seas RV Park	3443 Patrick's Pt Dr.	Transient	2	100	14
CA1200500	Sylvan Harbor RV Park and Cabins	875 Patrick's Pt Dr.	Transient	0	210	14
CA1200706	Trinidad Extended Stay RV	51 Midway Dr.	Community	130	0	73
CA1200710	View Crest Lodge	3415 Patrick's Pt Dr.	Transient	0	50	30
CA1210024	Westhaven CSD	Westhaven	Community	490	0	226

²³ A public water system provides water for human consumption through pipes or other constructed conveyances to at least 15 service connections or serves an average of at least 25 people for at least 60 days a year. A public water system may be publicly or privately owned.

Provision of water and wastewater services continues to be a concern for the area. Westhaven CSD has an existing waitlist for water service connections and there is no planned community wastewater system. Systems along Patrick's Point Drive and Stagecoach Road have previously experience water shortages requiring emergency trucking of water to supply residents. Due to this and other potential water shortage concerns, there could be a push for consolidation of water services in the future²⁴.

Westhaven CSD and the City are exploring the possibility of an intertie between the two systems. An emergency intertie would increase system resiliency in the event of a major water treatment system failure or water main break. It would also provide emergency access to additional water during a major fire. The City is encouraged to continue assessing the benefits and feasibility of an intertie between the two systems.

Concerning~~About~~ fire protection, CSA 4 currently provides services in unincorporated areas surrounding the City though a contract with CAL FIRE and has served the community since 1986. The Westhaven Volunteer Fire Department to the southeast of the City also provides emergency medical and fire protection services to the surrounding area. More information on fire protection services is provided in Section 5.8.

²⁴ Scott Gilbreath, Department of Water Resources. Personal Communication, December 2019.

4.0 ACCOUNTABILITY AND GOVERNANCE

4.1 Governance

The City of Trinidad is governed by a five-member city council whose members are elected at large. Legislative and policy functions are vested in the City Council. The Trinidad City Council consists of five members elected by the voters, each serving four-year terms with the Mayor selected separately from the elected Council members by the City Council. The term of office of the City Council is four years, and the Mayor is two years. City Council meetings are typically held on the second Tuesday of every month at 6:00PM at 409 Trinity Street in Trinidad. However, due to COVID-19 restrictions, meetings have been held virtually during the majority of 2020. The meeting agenda and the meeting packet are made available online for public review or in the Clerk's Office in Town Hall by the end of the day on Fridays prior to council meetings.

Table 4: Trinidad City Council Members

Council Members	Elected	Term Expires
Steve Ladwig, Mayor	November 2020	November 2024
Jack West, Mayor Pro-tem	November 2020	November 2024
Richard Clompus	November 2018	<u>November</u> 2022
Dave Grover	November 2020	November 202 2 4
Tom Davies	November 2018	November 2022

4.2 Administration

The City Manager is selected by the Council and oversees the functions of the City and its employees. The Manager is also responsible for preparation of the monthly City Council meetings. In Trinidad, due to the small size of the City and its staff, the City Manager has two additional functions that are typically held by other professionals in larger cities. First, the Manager acts as Trinidad's Finance Officer and is responsible for managing the preparation of the annual budget, the annual audit, ongoing accounts payable and receivable, employee payroll and benefits, regional/state/federal grant programs, and city investments. Second, the Manager coordinates the activities of the contract consultants that handle other City functions where there are no full-time employees. These include planning and building, legal services, engineering, and accounting. Trinidad's current City Manager was hired by the City in March 2019.

The City Clerk handles varied functions in providing services to the City Council and the residents of Trinidad. The Clerk (or assistant Clerk) acts as the Secretary to the City Council

and to the City's Planning Commission. In doing so, the Clerk maintains all official City records that include the records of public meetings, the official actions of the City Council in the form of minutes, proclamations, resolutions, and ordinances. The Clerk's office is the hub for providing services to the City residents. City licenses and permits, billing for water and the payment of water bills, the coordination of the Trinidad Cemetery, Town Hall use and rental, local recycling programs, and the general response to citizen inquiries all originate at the Clerk's office in Town Hall.

Trinidad adopted its first General Plan in 1976, the same year the state legislature enacted the Coastal Act. The General Plan was amended to be consistent with the Coastal Act in 1978. The General Plan is currently being updated and draft elements are available on the City's website. City Staff has received comments from the Coastal Commission on the draft General Plan and is working with the Coastal Commission on addressing those comments. The City is hoping to adopt an updated General Plan during the 2021-2022 Fiscal Year.

The Coastal Act requires all jurisdictions within the Coastal Zone to adopt a Local Coastal Plan (LCP). Trinidad's LCP consists of the City's General Plan and implementing ordinances (Zoning, Subdivision and Grading ordinances). While each LCP reflects unique characteristics of individual local coastal communities, regional and statewide interests and concerns must also be addressed in conformity with Coastal Act goals and policies. Following adoption by the City Council, an LCP is submitted to the Coastal Commission for review of consistency with Coastal Act requirements.

4.3 Accountability

When conducting service reviews and reviewing proposals, LAFCo considers an agency's accountability for community service needs, including governmental structure, operational efficiencies, financial resources, and promoting public access.

The City offers multiple ways to keep citizens informed about services, meetings, finances, and decision-making processes. Public notices and meeting schedules and agendas are posted on the website. Past meeting agendas and meeting minutes may be found in the Documents Library section of the city's website. The public may also provide verbal comments or complaints by phone, email, or in person at City Hall during business hours and/or at City Council meetings during the public comment period.

4.4 Shared Services and Facilities

The city collaborates with other public agencies to provide service more efficiently or effectively. Some of Trinidad's collaborative activities include the following:

- A long-term relationship with the Trinidad Rancheria, which is supplied with water from the City of Trinidad and coordinates with the City from time to time on water improvement projects, harbor-related facilities, and other natural and cultural resources and facilities.

- A long-term relationship with the Westhaven Community Services District (CSD). The City and District have been working together to develop and secure funding for water system and watershed improvements that serve to implement the Trinidad-Westhaven Coastal Watershed Plan and Humboldt County Community Wildfire Preparedness Plan. Collaborating on water system improvements is more cost effective and will lead to a closer working relationship between these neighboring water systems.
- The Trinidad Volunteer Fire Department (VFD) ~~currently is a party to the Humboldt County Fire~~ has mutual aid agreements for emergency medical and fire protection services, which also includes with the Westhaven VFD and CSA #4 ~~for emergency medical and fire protection services~~. Currently, the CAL FIRE Trinidad station responds to almost all calls within the City of Trinidad during the fire and non-fire season with support from the Westhaven VFD. Currently the Humboldt County Board of Supervisor's Fire Services Ad Hoc Committee is evaluating sustainable service options for the CSA #4/Trinidad/Westhaven areas.
- Membership in the Redwood Coast Energy Authority (RCEA), a joint powers authority founded in 2003 whose members include the seven cities, the county, and the Humboldt Bay Municipal Water District. RCEA administers Humboldt County's Community Choice Energy program, which offers local renewable energy and lower energy prices to Humboldt County residents and businesses.
- Membership in the Humboldt County Association of Governments (HCAOG), a JPA comprised of the seven cities and the county. HCAOG is the designated Regional Transportation Planning Agency and is largely responsible for programming state highway, local street, and road improvements, and public transportation resources.
- Membership in the Redwood Region Economic Development which is a collaboration of elected officials from throughout Humboldt County dedicated to economic and business development. California League of Cities, an association of California city officials who work together to enhance knowledge and skills, exchange information and combine resources to influence policy decisions that affect cities.

5.0 CITY SERVICES AND INFRASTRUCTURE

5.1 Service Overview

The City of Trinidad provides a full range of municipal services except for wastewater services which is provided by individual onsite systems. Municipal services provided directly by the City of Trinidad include: 1) water supply and treatment 2) stormwater drainage; 3) streets and street lighting; 4) parks and recreation; 5) law enforcement, and 6) volunteer fire protection services. The City is continually working to identify grant funding to pursue priority projects for water system improvements, hazard mitigation and preparedness, recreation, and street improvements.

5.2 Water

The City of Trinidad operates a municipal water supply system that serves residential and commercial properties within the City and several rural residential properties outside City limits. The City has water rights for surface water diversion from Luffenholtz Creek which provides all the City's potable drinking water. The water system includes an infiltration gallery on Luffenholtz Creek, a water treatment plant, several storage tanks, and water distribution piping network. The City also has some unused water rights on Mill Creek.²⁵

The City of Trinidad serves treated water to approximately 1,000 people within the City service area. The City's diversion and water plant are located along Westhaven Drive adjacent to Luffenholtz Creek. There are currently 252 service connections within city limits and 102 connections outside city limits²⁶.

Ongoing water services planning is necessary to address competing needs in the water service area, the Trinidad Rancheria, and surrounding areas. The City is encouraged to continuing assessing their water system for potential infrastructure upgrades and, as required by existing surface water diversion permits, to track water flows in Luffenholtz Creek to determine the seasonal flows and verify low flow bypass conditions of the creek. This can help the City to better evaluate the water source supply for current and future demands.

Water Supply

The City's water supply comes from Luffenholtz Creek, about two miles south of the City. As the only utilized domestic water source for the City of Trinidad and an important anadromous fish stream, Luffenholtz Creek has been designated as a "Critical Municipal Water Supply Area" which is defined as specific areas used by a municipality or community for its water supply system, which is so limited in area that it is susceptible to a potential risk of contamination from development activities. Trinidad's land use plan

²⁵ibid

²⁶ California Coastal Commission memo 8-24-18 RE City of Trinidad LUP amendment No. LCP-1-TRN-17-0072-1 and County of Humboldt Land Use Plan Amendment No. LCP-1-HUM-17-0066-1 (CalFire Trinidad Fire Station Water Service Extension)

designates the area as Special Environment (SE), which allows development of existing lots but no further subdivisions²⁷. The City also has a water right for extraction of 40.4 gpm on Mill Creek just north of the City. However, the City is currently not exercising this right and use of this water supply would require construction of a new diversion and other associated infrastructure on the creek²⁸.

The City is authorized to extract a maximum of 0.56 cubic feet per second (cfs) (251 gallons per minute) from Luffenholtz Creek²⁹. The City's water right permit stipulates that when the flow in Luffenholtz Creek is lower than 0.86 cfs, the City must leave at least 0.15 cfs in the creek, plus enough for the 0.0054 cfs worth of water rights downstream from the City, resulting in a total of 0.1554 cfs or approximately 70 gpm that must bypass the City's water intake³⁰. At a flow of .86 cfs, this still allows the City to extract its maximum allotment. However, when flow in the creek drops below 0.71 cfs, then the City's maximum allotment begins to be reduced. Should flow rates drop to 0.1554 or lower, the City would not be able to extract any water³¹.

During the drought period of 1977, the flow in Luffenholtz Creek was recorded to drop to 0.62 cfs (278 gpm)³². This is considered the lowest recorded flow conditions for Luffenholtz Creek. At this flow the City could still divert up to 208 gpm or 299,520 gpd, which is significantly more than the City's current peak day demand of 57,779 gpd³³. The City installed continuous flow monitoring equipment on Luffenholtz Creek in 2017 to track water right bypass compliance³⁴.

The City's legal right to extract water from Luffenholtz Creek is curtailed when the total creek flow upstream of the City's infiltration gallery drops below 0.71 cfs and diminishes as creek flows decrease (this is known as the Curtailed Extraction Zone)³⁵. Based on the very limited flow data available, it appears that drought conditions of the past have reduced creek flows to within the Curtailed Extraction Zone. The City's current monitoring of flows should be continued to comply with State Water Board requirements and to provide the City with ongoing information for operations.

In 2014, the City completed a water system upgrade which addressed several system deficiencies. This included installation of new water pumps, a settling filtration system, and other minor improvements. The City currently maintains two wet well pumps capable of delivering 175 gallons per minute individually. With one pump running, the

²⁷ CCC Memo, 8-24-18.

²⁸ GHD, Memorandum – City of Trinidad alternative raw water source evaluation. September 6, 2019.

²⁹ Water Treatment Plant Production Rate Test and Analysis. GHD Memorandum. May 1, 2019.

³⁰ GHD Memo, May 2019.

³¹ GHD Memo, May 2019.

³² GHD Memo, May 2019.

³³ GHD Memo, May 2019.

³⁴ Memorandum to Dan Berman from Rebecca Crow RE Waterline Extension to Calfire. GHD. 2017

³⁵ City of Trinidad Conceptual Hydrological Assessment of the Luffenholtz Creek Watershed. GHD Memorandum. September 6, 2019.

City can produce 252,000 gallons per day (gpd), if there is sufficient flow in Luffenholtz Creek to meet the demand and bypass requirements.

The City typically extracts approximately 70 gpm and operators anticipate, based on their experience, that extraction could be increased to approximately 105 gpm (151,200 gpd) during low flow periods³⁶. The City can legally extract significantly more water from the creek but there are several factors that may make this impractical. One of the factors limiting the capacity of the system is the turbidity of the raw water that flows into the wet well from the infiltration gallery. Higher turbidity rates require more polymer (an agent that aids in particulate clumping and settling) and a slower feed rate to the flocculator (a basin where polymer is gently mixed with water) and results in more frequent backwashing of the mixed media filters³⁷. Operator experience and historic pumping rates have shown that during low flow periods it becomes increasingly more difficult to extract water. Under low creek flow conditions, water flow through the gravels and into the infiltration gallery and wet well decreases and cannot keep up with maximum available pumping capacity. Hence the operational experience suggests a current limitation of approximately 105 gpm.

Since the intake system has capacity limitations under low flow conditions, further evaluation of the system would help the City better understand limitations in the system and Luffenholtz Creek watershed and to—identify potential system improvements and operational changes to increase intake capacity.

The water supply in Luffenholtz Creek available to Trinidad may be reduced in the future due to several factors³⁸. It is expected that upstream extractions, future droughts, and climate change could result in flows more frequently dropping into the Curtailed Extraction Zone where diversion rates are reduced or prohibited. However, future extractions in the watershed are difficult to predict due to the nature of water rights, possible changes in water uses, limited and incomplete data on historical extractions, changes in climactic conditions and other factors. Currently, there is sufficient water to meet the demands of the City and other outside connections.

Climate change could have a long-term effect on the amount of water available in the watershed for all beneficial uses. Low flow conditions in the Curtailed Extraction Zone could last for weeks or months depending on conditions. Depending on the severity and circumstances, this could result in a reduction in water available to meet customer needs. However, more information on seasonal flows of the creek is needed to better model future flow scenarios.

According to the City of Trinidad's General Plan, water supply concerns include:

³⁶ Hydrological Assessment, September 2019.

³⁷ GHD Memo, May 2019.

³⁸ Hydrological Assessment, September 2019.

- Property owners with riparian water rights in the area outside the City use coastal streams as a water source. California Department of Fish and Game is already concerned about shortages in Mill and Luffenholtz Creeks.
- Expanding the current water supply at Luffenholtz Creek may be an option, though the watershed is located entirely outside of City limits. The City needs to coordinate with the County to ensure the creek is protected from development. The ability of the watershed to produce more water needs to be evaluated, particularly during drought and low flow conditions.
- In several areas, groundwater supply is highly variable. Wells in the area do not produce enough water volume to meet demand. Other concerns include contamination of wells from failed septic systems and use of pesticides and other chemicals. Water quality of groundwater in the area is poor and would require more evaluation of existing treatment capabilities and potential modifications for groundwater treatment.
- Additional water use in the Planning Area may overburden soil capacity, septic tanks and increase ground and surface water pollution.
- The Trinidad Rancheria has proposed development plans, including a hotel and ultimately an RV park, gas station, and tribal housing for which a reliable water source will need to be secured.

Due to these and other concerns it is important the City promotes an effective water conservation program to minimize water consumption. The City may want to extend the City's conservation program to properties outside the City that are hooked up to the City's water system and encourage the County and/or the Trinidad Bay Watershed Council to provide water education to area residents. The City may also consider promoting the use of rainwater collection and greywater systems and encouraging the County to update their regulations to improve opportunities for greywater reuse³⁹.

Alternate sources of water have been considered for the City including development of a distributed spring collection system and connection to Humboldt Bay Municipal Water District (HBMWD). Both would require substantial permitting and infrastructure development but would result in a more reliable supply of water for the City.

It may be feasible to develop a water collection, treatment, and conveyance system utilizing the springs in Trinidad. The primary advantages of a distributed spring collection system are 'cleaner' source water and potentially more raw water availability due to water from multiple drainages. Some of the limitations to a distributed spring collection system are the effort needed to obtain legal water rights to the springs, the costs to install new treatment and conveyance infrastructure, increased monitoring, and maintenance requirements, and costs for land or right-of-way to be able to install and maintain

³⁹ GHD, City of Trinidad Alternative Raw Water Source Evaluation, Memorandum, September 6, 2019.

additional infrastructure, as well as installation and maintenance of additional access roads to the infrastructure. Additionally, a distributed spring collection system would be subject to the same vulnerabilities of drought and influences of other water users within the drainage, as the current system. However, the use of springs throughout the Trinidad area, or utilizing other creeks, has potential to meet the City's water needs with the continued use of Luffenholtz Creek⁴⁰. Another option that has been highlighted is rainwater collection and storage on customer properties. This could satisfy a few days' worth of supply and would require treatment, distribution, and backflow consideration.

Storage and Distribution

After being treated and chlorinated, water is stored in two 150,000 redwood tanks, which are carefully monitored to keep the wood wet to avoid warping⁴¹. Water lines distribute treated water to homes and businesses from the redwood storage tanks. The water tanks help to control pressure, provide a reserve supply in periods of high demand, and meet the fire flow requirements when emergencies arise⁴². Out of the total storage of approximately 285,000 gallons, approximately 180,000 gallons is reserved for fire flows⁴³. Ideally, this volume would be kept in storage for availability during a fire.

GHD evaluated the function of the distribution pipe network in 2019 and found that the system is functioning adequately under peak demand conditions⁴⁴. While no new connections were evaluated under this effort, the model could be modified to evaluate future water demands and the potential impacts on the existing system. The evaluation of the City's two water storage tanks indicates that there is sufficient storage to meet the City's existing average and peak water demand while maintaining sufficient fire suppression water assuming sufficient supply from the treatment system⁴⁵. The current storage tanks provide between one and two days of water to meet regular demands without the treatment plant in operation and with the minimal fire flow demand requirements.

The preliminary assessment of the City's fire hydrant capacity indicates that there is adequate capacity for almost all the hydrants. However, there are a few locations that would result in low pressure conditions in the system and one location that did not meet the fire flow requirement on Van Wycke Street. This condition is due to a landslide damaged pipe that runs from Edward Street west down Van Wycke Street. The broken and capped pipe causes flow to this section to be routed through a smaller pipe. This eliminates an important loop in the system, and water pressure has been affected in that neighborhood. While there is sufficient capacity for normal flow conditions, fire flow conditions cause pressure conditions to drop below threshold levels. This situation could

⁴⁰ City of Trinidad alternative raw water source evaluation. GHD Memorandum. September 6, 2019.

⁴¹ City of Trinidad drinking water system model. GHD Memorandum. October 2019.

⁴² City of Trinidad Website <http://trinidad.ca.gov/water-department>

⁴³ City of Trinidad alternative raw water source evaluation. GHD Memorandum. September 6, 2019.

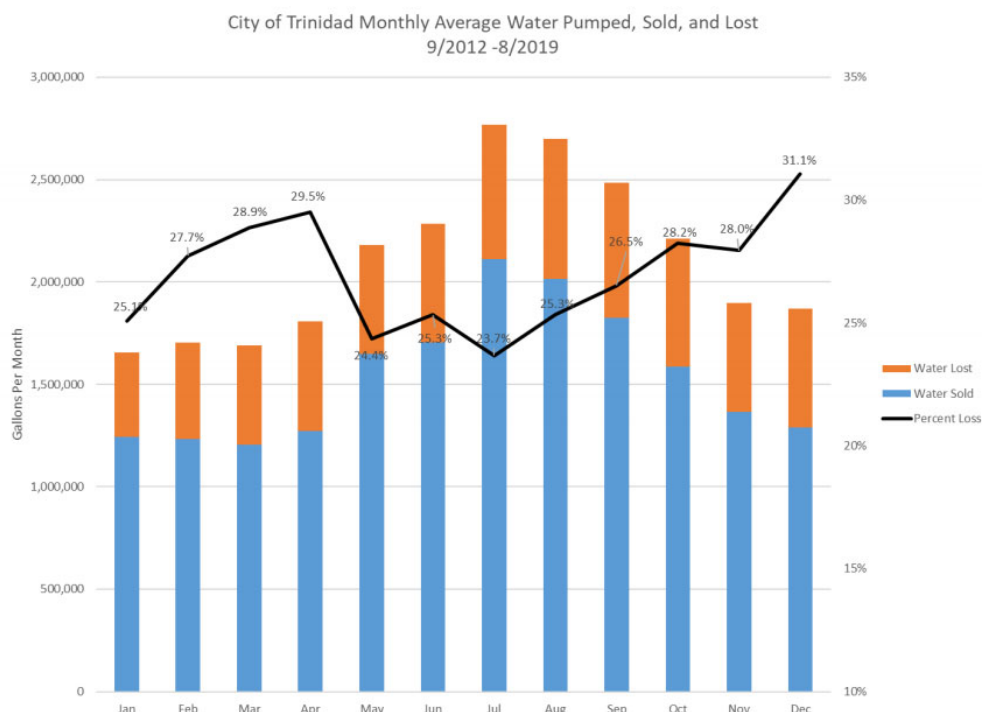
⁴⁴ City of Trinidad drinking water system model. GHD Memorandum. October 2019.

⁴⁵ City of Trinidad drinking water system model. GHD Memorandum. October 2019.

be resolved by repairing the broken/capped pipeline. The City is currently working on short-term and long-term projects to address water flow along Van Wycke Street. A temporary fix was installed in November 2020 utilizing an above-ground pipe to traverse the failing slide area.

While the distribution system is functioning adequately to meet peak demand, it is experiencing a substantial amount of loss. Typical system losses for a municipality are between 10-20 percent. However, Trinidad is experiencing losses of 24-31 percent. This is likely attributed to the aging asbestos cement pipes and associated leaks⁴⁶. The City has been working to identify potential leaks and will continue to identify and repair problem areas. Continued efforts to address system losses can increase the system's supply and help address future water demands. It is recommended that the City continue its efforts in this area.

Figure 3: Trinidad Water System Loss⁴⁷



Water Service Areas Supply and Demand

As stated previously, the City experiences an average annual demand of 36,325 gpd with a peak demand of 57,779 gpd⁴⁸. The largest users of water per account are visitor serving and commercial uses as shown in the table and chart below.

⁴⁶ GDH, City of Trinidad water demand and loss analysis memorandum, September 6, 2019.

⁴⁷ GHD, Demand and loss analysis, September 2019. Figure 1, pg. 3.

⁴⁸ SHN, Water Demand Assessment, Projections for Build-out Within the City's Service Area, City of Trinidad, California. August 2019.

Table 5: Average and Peak (July) Daily Water Use by Land Use Zone⁴⁹

Zone	Total gpd (annual avg.)	Avg. gpd (per account)	Total Peak gpd (July average)	Avg. Peak gpd (per account)
C	6,047	403	10,511	692
VS	2,717	1,358	3,145	1,572
PD	3,361	140 ²	5,643	235
PR	1,490	166	1,475	191
SR	6,045	163 ²	7,653	211
UR	16,665	128	29,364	226
Total	36,325		57,779	

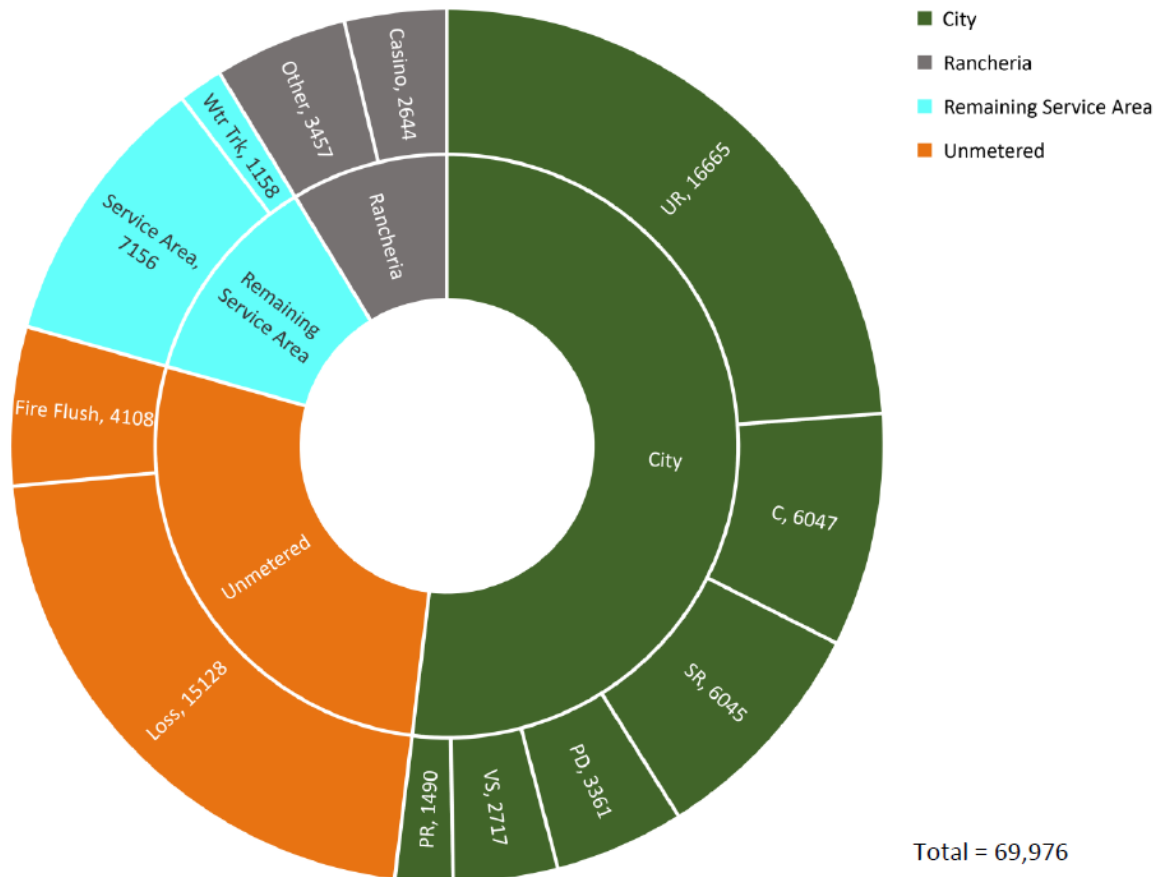
1. gpd: gallons per day

2. Removing on anomalous water user or large leak would substantially change this average.

C= commercial VS= visitor serving PD= planned development PR= public and religious

SR= suburban residential UR= urban residential

Figure 4: 2018 Trinidad Water System Average Daily Water Use (gpd)⁵⁰

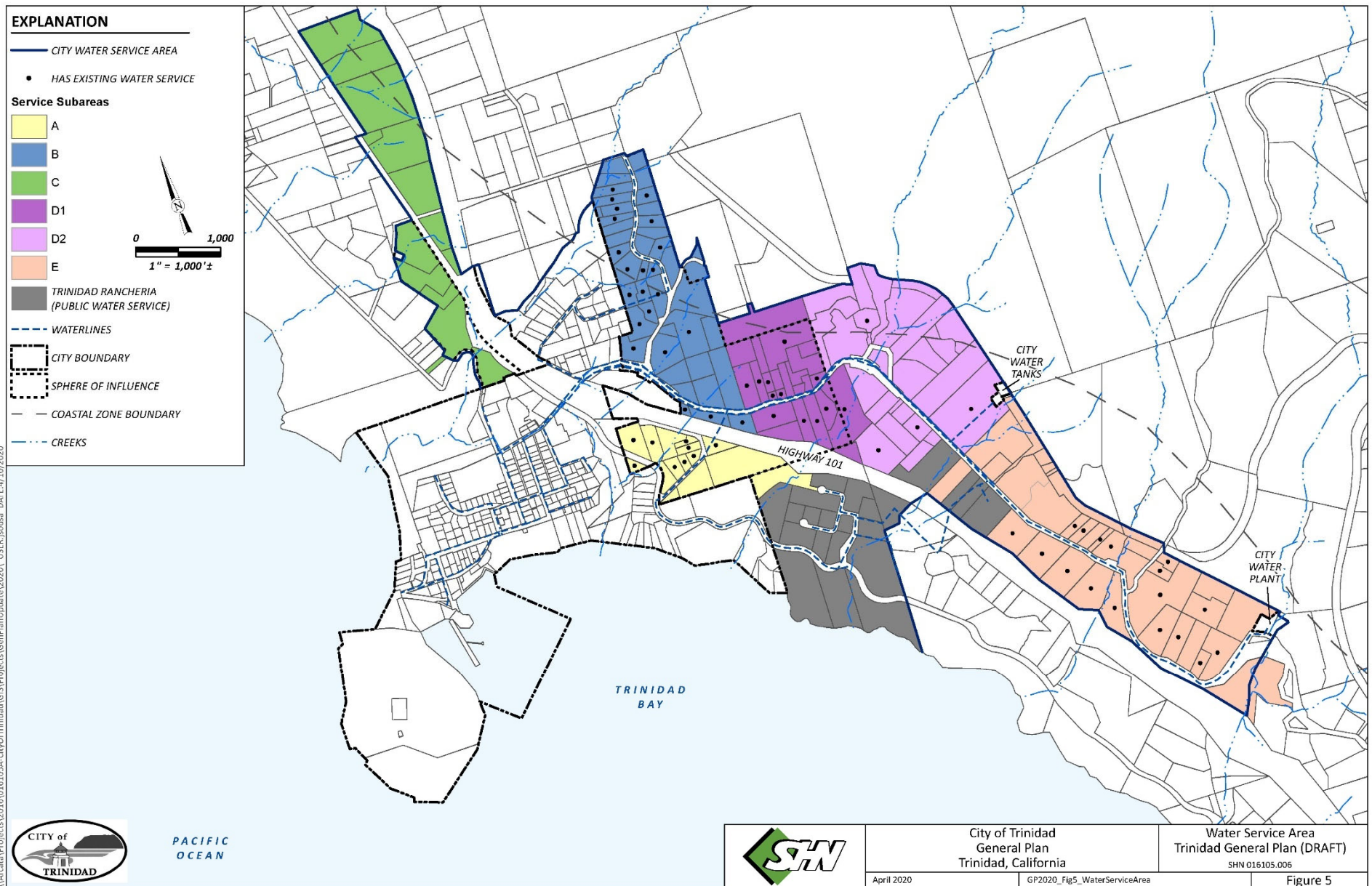


⁴⁹ SHN, August 2019. Table 1, pg. 3.

⁵⁰ SHN, August 2019. Figure 1, pg. 12.

In 2019, SHN conducted a water demand assessment for the City that included full build-out of the City and all other areas within the City's Urban Limit Line/ Water Service Area. This area is further broken down into service subareas as shown in Figure 5. According to the study, complete built-out of the entire water service area could result in an additional average demand of 52,655 gpd with an additional peak demand of 85,707 gpd. This would create a total average demand of 88,980 gpd and a total peak demand of 143,486 gpd which exceeds the current treatment capacity of the water system.

Figure 5: Trinidad Water Service Subareas



According to GHD's 'Water Treatment Plant Production Rate Test and Analysis' (memo dated May 1, 2019), there is approximately 48,000 gpd on average of unused capacity at the City's water plant in its current configuration, assuming there is adequate water in Luffenholtz Creek to draw from. This means with the current treatment plant configuration the City only has about half the capacity needed to serve build-out in the City and the remainder of its service area during peak usage.

It should be recognized that build-out is not likely to occur inside or outside the City within the next 20 years, or the planning horizon of the updated General Plan⁵¹. Trinidad has averaged about one new house every two years over the last 10 years. Allowing ADUs could spur development inside the City and annexing and/or providing water service within the service area could also spur additional development on water-limited properties. But this is anticipated to be a minor increase in the rate of development. Consequently, the level of water demand estimated for full build-out would be expected to occur in the distant future, if ever.

In addition, the current limiting factor for water supply is the treatment capacity of the water plant if there is enough water in the creek. The City's water right, if there is enough water in the creek, is more than double the existing treatment capacity of the water plant. There have been times during late summer and in times of drought when the limiting factor is not enough water in the creek. Improvements could be made to the City's water plant to increase the production capacity and be planned to coincide with additional development as it occurs.

CAL FIRE Water Service Extension

In 2009/10, CAL FIRE applied to LAFCo for a water service extension from the City of Trinidad municipal water system to its station located approximately one mile north of the city on Patrick's Point Drive due to contamination of the station's only water source. In support of the LAFCo application, CAL FIRE commissioned a feasibility study for the water service extension, which found that the fire station's estimated peak demand of up to 2,000 gpd for domestic water usage is less than 2% of the City's available capacity and that the City has available water supply to provide the fire station with potable water. Since CAL FIRE is a public agency that performs an essential public safety purpose, and because its water situation was a public health and safety issue, LAFCo approved an exception for the water service extension outside of the City's service area boundary (Resolution No. 10-07) for a 1.5-inch water line. LAFCo's approval was conditioned upon CAL FIRE negotiating an agreement with the City, assuming all financial responsibility, and completing all the required environmental and permit compliance.

After the LAFCo action, the service extension required a General Plan/Local Coastal Program Amendment to the Land Use Plans (LUP) of both the City of Trinidad and

⁵¹ ibid

Humboldt County (Trinidad Area Plan).⁵² The California Coastal Commission reviewed both the County of Humboldt's LUP amendment and the City of Trinidad's LUP amendment on August 24th, 2018 and recommended that the Commission certify the LUP amendment with one modification⁵³. The revised LUP amendments would prioritize visitor-serving uses over residential uses because the municipal water supply likely does not have the supply capacity to meet water demand within its entire service area. CAL FIRE is working with the City attorney to develop a water supply contract. Construction is expected to occur in 2021. The City drafted a contract with CAL FIRE staff. The City and CAL FIRE attorneys are now working together to resolve issues with and finalize the contract.

Rancheria Project Update and Water Supply

The Trinidad Rancheria recently requested additional water allocation from the City of Trinidad to serve a proposed hotel next to the existing casino along Scenic Drive and to accommodate increased uncertainties and risks related to climate change. The Rancheria request for their project would substantially increase water demand. The currently proposed hotel has been estimated to have a peak demand of 14,184 gpd and an average demand of approximately 9,500 gpd⁵⁴. The City currently provides water for the casino, tribal offices, and homes on the Rancheria.

To better inform the City's decision for the Rancheria's request, an analysis of current water use inside and outside the City was conducted. Water use data for accounts within the service area outside City limits was treated and analyzed similarly to the water use data for residential properties within City limits⁵⁵. The Rancheria parcels were reviewed separately for the purposes of calculating average water use that includes connections for commercial and office uses, in addition to connections serving individual parcels and/or homes.

Based on this analysis, average water use within the service area outside the City and Rancheria is substantially lower than residential water uses in the City, with an annual average of 94 gpd which peaks at 158 gpd in July⁵⁶. Average water use per account on the Rancheria is closer to the City residential account averages, at 144 gpd annually and 172 gpd during July (without the casino)⁵⁷. Therefore, all the accounts were averaged, including the Rancheria parcels, but excluding the casino, to use in the calculations for potential build-out demand for the service area outside City limits. This equated to an average of 109 gpd, with a peak of 166 gpd in July⁵⁸.

⁵² *ibid*

⁵³ California Coastal Commission memo 8-24-18 RE City of Trinidad LUP amendment No. LCP-1-TRN-17-0072-1 and County of Humboldt Land Use Plan Amendment No. LCP-1-HUM-17-0066-1 (CalFire Trinidad Fire Station Water Service Extension)

⁵⁵ Water Demand Assessment. SHN. August 2019.

⁵⁶ *ibid*

⁵⁷ *ibid*

⁵⁸ *ibid*

In accordance with the Rancheria's Comprehensive Community-based Plan, there are no plans for additional residential development within the main Rancheria boundaries. Instead, the Rancheria has, and will continue to, purchase individual parcels to provide housing for Rancheria members. For example, the Rancheria has purchased several parcels on the east side of Hwy 101 along Westhaven Drive, as well as parcels in McKinleyville. In general, these parcels are already residential, and most have been, or eventually will be, transferred into Tribal Trust status. The Rancheria's community plan calls for additional commercial and institutional development, possibly replacing existing housing. The potential development envisioned in the Plan includes the hotel, an RV park, gas station, mini-mart, retail and incubator space, and a cultural/community center. However, most of the development is currently speculative.

In absence of a water supply agreement with the city, the Trinidad Rancheria is working to evaluate all options for water supply to the proposed hotel. This may include onsite sources from two existing wells, possible trucking of water, and/or drilling of an additional well. The Rancheria has also requested the Humboldt Bay Municipal Water District (HBMWD) consider an extension of water service to the Rancheria properties. As of November 2020, the HBMWD and Rancheria have agreed to pursue a feasibility study for the extension of water service.

Trinidad Rancheria is obtaining a loan from the Bureau of Indian Affairs (BIA) to fund the proposed hotel. To obtain In order to provide federal funding for the ~~hotel~~ project, the ~~Bureau of Indian Affairs (BIA)~~ must demonstrate the project's consistency with the California Coastal Management Program (CCMP) in accordance with the federal Coastal Zone Management Act. The BIA prepared and submitted an Environmental Assessment for the project and stated its consistency with the CCMP in February 2019. In August 2019, the Coastal Commission conditionally concurred with the BIA's s consistency determination.

As a condition of its August 2019 concurrence for the proposed hotel project, the Coastal Commission required the BIA to provide evidence that hotel water would be provided from the City of Trinidad or another water supply that is acceptable to the Executive Director, accompanied by an analysis of effects to coastal resources. On September 11, 2020, the BIA submitted a letter to satisfy this condition requirement and stated that two wells would be supplying water for the project. Following the review of this information and comments received during a 30-day public comment period, the Executive Director responded to the BIA finding that the proposed water source for the hotel (on-site wells) did not show adequate supply for the project and therefore is not consistent with Section 30250(a) of the Coastal Act. Therefore, ~~and that~~ the Commission's condition has not been met. Should other water sources become available, the Coastal Commission will evaluate supporting information that would be necessary to meet the Commission's condition as appropriate.

The City will continue to monitor the proposed hotel project as it assesses future water needs for the City and surrounding areas. Depending on what water source is utilized for the project, it may or may not have an impact on the City.

Water Rates

When the Luffenholtz Creek water plant opened, the City Council established a two-tiered rate system with water customers in the city limits paying a lower rate than water customers outside the city limits. A water service area was established between the treatment plant and the city limits, along Westhaven Drive. Residents along the pipeline could hookup to city water. Hookup fees for non-residents are also higher than hookup fees for residents. There is a limited demand for new water connections due to the small amount of urban growth that is experienced in the City on an annual basis. At this time, no additional connections are permitted outside of the City limits⁵⁹. The rates for water service can be seen in Table 4.

Table 6: 2018-19 Trinidad Water Rates

Meter Size	Inside City Limits	Outside City Limits
Base Charge	\$46.36/month	\$57.95/month
Consumption Charge	\$4.53/100 ft ³	\$5.68/100 ft ³
¾" Installation Fee	\$4,500	\$7,500
1" Installation Fee	\$4,900	\$8,100
1 ½" Installation Fee	\$5,900	\$8,900

*Water rates will increase 2.5% each year as per Council Resolution 2012-01. Source: City of Trinidad

The City is discussing an update to the rates, which may include increases through a progressive rate structure. When the City is ready to update its rates, it will go through the Proposition 218 process.

5.3 Wastewater – OWTs Maintenance

The City of Trinidad does not have a central sewage collection or treatment system and as such, wastewater collection is not a specified City service. However, septic systems exist throughout the City, and reliance on these systems provides a considerable constraint to housing development and economic growth. In late 2008, the City Council adopted an Onsite Wastewater Treatment Systems (OWTS) ordinance. This ordinance establishes a septic system maintenance program for property owners in the City.⁶⁰

⁵⁹ ibid

⁶⁰ City of Trinidad website <http://trinidad.ca.gov/public-works-department>

OWTS Overview

Currently, the City of Trinidad is comprised of approximately 220 residences, all of which have individual OWTS. The maintenance of these systems is a responsibility that falls on the landowner. A large proportion of the existing systems are more than 20 years old and were either installed prior to permit requirements or prior to permanent record keeping. It is unknown whether systems in and around Trinidad are being maintained or are functioning properly. Maintenance of septic systems is very important because it ensures the system is functioning properly, extends the life of the system and helps prevent system failure. Failing septic systems pose a problem for homeowners and the City as a whole.⁶¹

The City of Trinidad has been concerned about the OWTS, or septic systems, within the City for almost 40 years. Trinidad was subdivided in the 1860's into approximately 8,000 sq ft. single family residential lots. As a result, the OWTS are at a high density. Current regulations require a minimum of one acre for new lots that will be served by OWTS and public water. In Trinidad, most residential lots are smaller than 0.25 acres.

The permit fee schedule and updated guidelines were adopted by the Council in October 2012. City staff continue to apply for grant funding to help property owners offset some of the costs associated with this program, but funding for improvements on private property is scarce. The City is committed to the OWTS Management Program to protect water quality, the environment, property values and the local economy. The current OWTS program regulations started being implemented in 2013⁶².

The City's first OWTS improvement project (2008 – 2010) to provide homeowner assistance for OWTS improvements was funded through a Clean Beaches Initiative grant for \$356,000. The project researched source tracking using fluorometry in conjunction with water quality testing to identify and characterize bacterial contamination and at-risk OWTS near water sources that drain into Trinidad Bay. The project then addressed the threat of bacterial contamination in creeks and coastal waters due to malfunctioning OWTS by repairing or replacing 23 failing systems in Trinidad and Westhaven that were identified and rated as high priority for water quality impacts⁶³. A second Clean Beaches Initiative Grant (2015-2019) was obtained for \$716,332. This grant project continued the water quality monitoring and resulted in the replacement or upgrade of 19 OWTS. Effectiveness monitoring showed a decrease in bacterial contamination.

Goals mentioned in the City's General Plan include pursuing grant funding or the feasibility of a revolving loan program to monitor and implement projects within the City's entire Planning Area to reduce pollution from OWTS. They also include encouraging Humboldt County to participate to the maximum extent possible. Project goals include determining what areas and which OWTS are contributing the most pollution and offering financial incentives or other assistance to help landowners fix problems. The City and

⁶¹ ibid

⁶² Ibid

⁶³ Trinidad Bay Watershed Council <http://www.trinidadwatersheds.org/programs-and-projects/>

County may want to consider the feasibility and desirability of forming a Septic Maintenance District from Trinidad to Moonstone.⁶⁴

OWTS Management Program

The Trinidad Planning Commission and City Council both supported the development of an OWTS Management Program. In 2001, the Planning Commission and planning staff developed a draft OWTS ordinance that would create the basis for a comprehensive OWTS Management Program. Due to budget constraints, the project was put on hold while planning staff applied for grant funding to finish developing the program. This process took a long time, because it is difficult for a City of such a small size to obtain the resources necessary to develop a sound, but complex program that meets the City's and its resident's needs.

The City of Trinidad OWTS Management Program is a regulatory program designed to ensure that septic systems in the City are inspected, maintained, and appropriately upgraded to protect public health and water quality⁶⁵. The OWTS Ordinance provides the legal framework for implementing an OWTS Management Program. This Ordinance is supplemented with detailed Definitions, Guidelines and Regulations. The Ordinance incorporates aspects of existing requirements for the design, construction, and alteration of OWTS already in effect (Sewage Disposal Regulations). In addition, it creates an Operating Permit system that requires all OWTS in the City to be regularly inspected and maintained; everyone owning an OWTS in the City will be required to possess a valid operating permit. The operating permit process includes: an inspection, inspection report, OWTS User/User Questionnaire, and operating permit issuance.

The OWTS User/User Questionnaire asks about the type and amount of use of the OWTS, such as how many people live there, whether you use a garbage disposal, etc. Within 30 days, customers are issued an Operating Permit that specifies a maintenance schedule for the OWTS. An average Operating Permit will be for a period of 3 years but may range anywhere from 1 year (rarely less) for higher risk systems to a maximum of 5 years for low-risk systems. The maintenance schedule is based on the following information: age, size, and condition of the system, including whether it meets current code requirements, and its performance rating, site conditions, type, and intensity of the use of the system relative to its design capacity. The City will then track maintenance schedules and the terms of the Operating Permit. If new development occurs (such as a building addition), or property is transferred, the Operating Permit and OWTS will be reevaluated. This is the time that upgrades are most likely to be required for substandard systems.

There are several reasons for having an OWTS Management Program in Trinidad including maintaining compliance with state requirements, pollution, and public health. By

⁶⁴ ibid

⁶⁵ City of Trinidad. OWTS Management Program.

creating an OWTS Management Program, Trinidad can maintain local control and meet local needs.

Pollution from OWTS has been noted as an issue for the City. Trinidad State Beach is listed as “impaired” for bacteria pursuant to the Clean Water Act due to the number of times that bacteria samples have exceeded the State Standards at the mouth of Mill Creek. The topic of pollution also relates to public health as the two are naturally tied.

As a City, Trinidad aims to protect health, safety, and public welfare; the OWTS Management Program aids in this mission. If a septic system is well-maintained and working properly, it will remove most of the pollutants. However, insufficiently treated sewage from septic systems can cause groundwater contamination, which can spread disease in humans and animals.

The ordinance provides for significant variability and allows the flexibility to accommodate different situations. Exceptions to standards are currently allowed by the Health Department which continues under the city ordinance. Every OWTS will be evaluated individually and the Health Officer and/or OWTS Administrator will work with individual property owners to come up with mutually agreeable solutions. More information on the OWTS Permitting process is available on the City's website.

The City has lacked the staff to fully implement the OWTS program to date. However, it is fully enforced for short term rentals, property sales, and building improvements. This has resulted in numerous systems upgrades and replacements. The City has also implemented two rounds of Clean Beaches grant funding that paid to find and replace failing septic systems in Trinidad and Westhaven and to monitor water quality.

As a result of this program, property owners are more educated on the proper operation and maintenance of OWTS. Several failing or malfunctioning OWTS were repaired and replaced as a result of this program. Pre- and post-project water quality sampling showed reductions in exceedances of bacterial water quality standards⁶⁶.

The City of Trinidad will continue to implement its own regulatory OWTS Management Program within City limits and will continue work with the Humboldt County Division of Environmental Health in monitoring, regulating, and repairing OWTS within the Trinidad Bay Watershed Planning Area⁶⁷. The City will also continue to provide public outreach and education regarding OWTS to residents and visitors to the City and will continue to monitor water quality as funding allows. Being able to provide monetary incentives to maintain and repair OWTS would continue to further the regulatory and educational efforts being implemented by the City and the County.

⁶⁶ Trinidad-Westhaven Coastal Water Quality Restoration Program/OWTS Emphasis: Clean Beaches Initiative Grant Final Report. City of Trinidad. December 2010.

⁶⁷ *ibid*

OWTS Inspections

The inspection program is one of the most important components of the OWTS Management Program. Inspections must be done by a Qualified Service Provider on a form approved by the City. The initial performance inspection provides baseline system information that will determine the maintenance, renewal, and potential upgrade requirements. Subsequent performance inspections determine how well the OWTS is functioning and whether any maintenance or repairs are needed. Final inspections are done by the Department of Environmental Health as part of an OWTS permit for construction, repair, etc.

City staff does not currently conduct OWTS inspections. Instead, they are completed by a qualified service provider hired by the property owner. The inspection reports are submitted to the City and reviewed as part of issuing an OWTS operating permit. Gaining compliance from every property owner is anticipated as a potential issue in the future when the City fully implements the program.

The inspections allow proper maintenance to be planned for systems and help customers know how to keep the system working well. Maintenance is much cheaper than repair or replacement of failed systems, which can cost upwards of \$20,000. Typical septic maintenance is also half the cost of local sewer fees over an average three-year period.

Grant Programs

In 2001, City staff applied for two grants to keep moving the program forward given the City's limited budget. Under a State Prop 13 and a federal National Onsite Demonstration Program (NODP) grant⁶⁸. Throughout the grant period, staff continued to refine the draft ordinance with input from the OWTS Committee and the public. The City held an additional Town Hall Workshop in November 2005 to get the community reinvolved in this program, educating them about septic systems in general, and updating them on the City's developing program⁶⁹. Several unique aspects were added to Trinidad's new ordinance to best meet the needs of the community.

Another grant program utilized by the City was the Prop 50 watershed planning grant received in 2006. This grant resulted in many benefits to the community, including the formation of the Trinidad Bay Watershed Council and the creation of the Trinidad-Westhaven Integrated Watershed Management Plan. This process included a significant public education and outreach component, and three primary threats to water quality were identified: stormwater, sediment and OWTS. Based on the watershed planning effort described above, the City received a Clean Beaches grant in 2009 that went toward continued public outreach, finalization of the City's OWTS Management Program and repairing and replacing identified failing and improperly functioning septic systems in the Trinidad-Westhaven area.

⁶⁸ City of Trinidad. OWTS Development Program.

⁶⁹ *ibid*

Finally, the permit fee schedule and updated Guidelines were adopted by the Council in October 2012. City staff continue to apply for grant funding to help property owners offset some of the costs associated with this program.

5.4 Stormwater Drainage System

Trinidad's stormwater drainage system is operated by the City and serves a portion of the Trinidad city limits. The area receives significant amounts of rainfall each year, averaging approximately 54 inches. The statistically predicted 100-year rainfall is just over 80 inches per year⁷⁰.

Stormwater Infrastructure

The City has an old and incomplete stormwater drainage system. The location, type and condition of some components are unknown. Studies reveal that stormwater runoff originating in the northern portion of the City is routed through a series of roadside ditches, drain inlets, and culverts which discharge to the Mill Creek drainage. Stormwater originating in the central portion of the City watershed is also routed through a series of roadside ditches, drain inlets, and culverts to a storm drain outfall adjacent to the boat launch on Trinidad Bay Beach (#TR1033). Some areas, such as Wagner Street, have no curbs or drain inlets, so drainage is generally south towards the bluff areas or towards Parker Creek. Stormwater from the HSU Telonicher Marine Lab (TML) is also routed in a storm drain that parallels the City's stormwater system and discharges through #TR1032. The Harbor Area mainly has limited stormwater runoff from the parking areas, the pier, and Trinidad Head.

The existing stormwater collection infrastructure is aging and approaching the 50-year mark⁷¹. Based on the age of the system, there are likely infiltration and inflow issues. Some pipes may have been disconnected and it is unknown where some pipes drain to. Portions of the system that have been constructed on Ocean and Trinity Avenues are likely in good condition given their recent construction in 2014⁷².

The City's Stormwater Management Improvement Project is an ongoing project that implements enhancements to the City's stormwater system to capture, treat, and infiltrate stormwater runoff, thereby significantly reducing pollutants and the quantity of stormwater entering the Trinidad Head Area of Special Biological Significance (ASBS) and protecting its water quality and beneficial uses. The overall project goal is to eliminate stormwater discharge to the ASBS and thereby comply with the California Ocean Plan prohibition of discharge. This project was funded through a Proposition 84 ASBS Program grant administered by the State Water Resources Control Board Division of Financial Assistance. Phase 1a and 1b construction has been completed on enhancements to the upper area of the City's stormwater system. Post project monitoring was completed in

⁷⁰ Sperling's Best Places <https://www.bestplaces.net/climate/city/california/trinidad>

⁷¹ USDA Rural Funding Application. GHD. January 4, 2018.

⁷² *ibid*

2015 to demonstrate project effectiveness in reducing the quantity of stormwater discharged to the ASBS⁷³.

Area of Special Biological Significance

The Trinidad Head ASBS was designated in 1974 and covers 297 acres around Trinidad Head and Bay and is adjacent to an identified stormwater outfall⁷⁴. Also known as State Water Quality Protection Areas, ASBS designated areas cover much of the length of California's coastal waters. They support an unusual variety of aquatic life and often host unique individual species. Trinidad Bay was designated as an ASBS in part because of the fluctuating presence of bull kelp (*Nereocystis luetkeana*), which are considered biologically significant in providing an ecological base for fish and invertebrate habitats by supplying food and shelter. Due to the area's designation as an ASBS, the bordering coastal watersheds are also considered a Critical Coastal Area by the California Coastal Commission⁷⁵.

All ASBS designated areas may be adversely affected by polluted stormwater discharges, which could damage their unique ecosystems⁷⁶. Water quality impairments from the discharge of polluted runoff has the potential to damage the ASBS ecosystem which could impact City residents, many of whom rely on tourism and fishing for income which are both recognized beneficial uses of the ASBS. The beaches along the ASBS also provide an area for water contact and non-contact recreation, including aesthetic enjoyment.

The State Water Resources Control Board (SWRCB) Ocean Plan prohibits all discharges to an ASBS unless an exception is granted by the SWRCB. The City, Rancheria and TML all requested and received an exception to the Ocean Plan discharge prohibition^{77,78}. The City and the Rancheria fall under Statewide general exception and the Marine Lab has an individual exception. The City continues to implement projects that will reduce bacterial contamination in the waters at Trinidad Beach and Trinidad Bay Beach in addition to minimizing direct stormwater discharge into the ASBS.

Due to the area's biological significance and sensitivity to various types of pollution, including stormwater runoff, it is important for the City to continue its efforts in improving stormwater drainage. Recently, the City has conceptually developed water quality improvement projects as part of an ongoing integrated watershed planning process.

⁷³ Trinidad Bay Watershed Council <http://www.trinidadwatersheds.org/programs-and-projects/>

⁷⁴ State Water Resources Control Board, Areas of Special Biological Significance, Trinidad Head. Accessed from https://www.waterboards.ca.gov/water_issues/programs/ocean/asbs_map.shtml.

⁷⁵ California Coastal Commission Trinidad Head CCA Factsheet. December 2019.

⁷⁶ Report for Trinidad ASBS Stormwater Project Groundwater Model Addendum for LID Zoning. GHD. January 2019.

⁷⁷ City of Trinidad ABS Compliance Plan. City of Trinidad Stormwater Program Staff. September 20, 2013.

⁷⁸ Program Final Environmental Impact Report SCH# 2011012042 Exception to the California Ocean Plan for Areas of Special Biological Significance Waste Discharge Prohibition for Storm Water and Nonpoint Source Discharges, with Special Protections. February 21, 2012.

Low Impact Development (LID) stormwater treatment techniques such as utilizing infiltration and bio-retention swales are planned for incorporation into the system.⁷⁹

Stormwater Drainage Studies and Modeling

In 2012, a geotechnical analysis was conducted for the City's proposed ASBS stormwater improvement project. This geotechnical evaluation consisted of reviewing previous studies and reports; drilling 18 soil borings, which extended from the surface to bedrock; installing groundwater monitoring wells in nine of the soil borings; monitoring of groundwater elevation for four events; surveying and mapping of major surface features, geological features, and identified groundwater seeps and springs; and conducting seismic reflection and electrical resistivity tomography along four transects. The analysis showed that water entering the area from upgradient soils, precipitation, or septic systems quickly migrates vertically down to the limiting bedrock layer where it then flows along the sloping bedrock surface to the exposed bluffs to the northwest and south, Mill Creek to the north, and Parker Creek to the east. The report also identified two potential primary locations for LID stormwater systems including the north side of Main Street near Stagecoach Road and to the southwest between Trinidad Head and the City⁸⁰.

Based on the preliminary geotechnical analysis, a groundwater model was created to better show the movement of water in and around the City. It included modeling of impervious surfaces within the City, depth of soil layers, and potential for drainage. This model helped inform the design process for LID projects around the City⁸¹. Several LID construction projects were conducted because of the modeling in the main portion of the City.

After heavy rainfall in 2016 and 2017 that created a state of emergency declared by Governor Jerry Brown in many coastal counties, including Humboldt, the bluff adjacent to the Trinidad Memorial Lighthouse was affected and exhibited visual signs of slope instability including a fresh escarpment with fissures and slumping of the bluff in the previously dormant landslide (per SHN's March 24, 2017 report titled: "Preliminary Assessment of Current Slope Stability Conditions, Trinidad Memorial Lighthouse, Edwards Street, Trinidad"). As part of the City's response, the City authorized collection of groundwater data from the City's existing groundwater monitoring wells to update the previously developed groundwater model with the goal of checking to see if post-construction performance of the features implemented on Trinity and Ocean Avenue were performing as previously expected⁸².

The updated model indicated the two previous features implemented on Trinity and Ocean Avenue were performing as previously expected. The updated existing conditions model was then used to model the City's remaining planned LID stormwater

⁷⁹ *ibid*

⁸⁰ GHD, City of Trinidad, ASBS Stormwater Improvement Project Geotechnical Analysis, October 2012.

⁸¹ GHD, Report for Trinidad ASBS Stormwater Project – Groundwater Model Technical Report, September 2013.

⁸² Report for Trinidad ASBS Stormwater Project Groundwater Model Addendum For LID Zoning. GHD. January 2019.

projects. As a result, the City decided to not build one planned small LID feature on West Street as the model could not verify that the infiltrated stormwater from that project site would not end up at or near the slope instability adjacent to the Trinidad Memorial Lighthouse⁸³. The City will continue to utilize the groundwater model as it assesses additional LID projects around the city. The goal is to discontinue use of the outfall in the ASBS to better protect this sensitive ecological area.

Planned Stormwater Upgrades

Currently the City's aging stormwater infrastructure still discharges untreated runoff into the ASBS at Launcher Beach (#TR1032). The long-term goal of the City is to help protect the ASBS by making improvements to the stormwater drainage system, including implementation of Low Impact Development Best Management Practices (LID/BMPs). LID and BMPs will capture, treat, and infiltrate stormwater runoff from rainfall events, thereby minimizing stormwater pollutants that enter the ASBS.

The City pursued grant funding to complete an Integrated Coastal Watershed Management Plan (ICWMP). The result was a Stormwater Action Plan that identified projects within the City. The City pursued grant funding to implement the action plan, portions of which have been completed and final phases are now funded. The overall concept is to utilize simple technologies and gravity-based systems with low maintenance requirements. The completed project would result in no direct ocean discharge, eliminating the City's compliance requirements for ASBS discharges.

Completed work includes: Integrated Coastal Watershed Management Plan (2008), Geotechnical Investigations (2012), Groundwater Model (2013), Construction of Phase I (2014) on Trinity Street and Ocean Avenue, and Construction of Phase I-b (2018) at Hector Avenue and East Street⁸⁴. Final phase Stormwater improvements are located at: Edwards Street, Ewing Street, Underwood Drive, Van Wycke Street, and the Lower Parking Lot⁸⁵.

The ASBS Storm Water Management Improvement Project has completed environmental planning, design and permitting and will be moving into the construction phase, beginning with advertising for bids. The ASBS Project has been funded through a grant of \$4,832,981 from the State Water Resources Control Board (SWRCB) and a grant of \$540,994 from the USDA Rural Utility Service⁸⁶.

The project is moving slowly due to Covid-19 pandemic measures. The City has submitted a request to the funder for an extension of the grant schedule to provide additional time to secure a Coastal Development Permit from the Coastal Commission and an access

⁸³ ibid

⁸⁴ ibid

⁸⁵ ibid

⁸⁶ ibid

agreement for the Trinidad Rancheria. The City will propose going out to bid in early 2021 with construction scheduled for summer 2021⁸⁷.

As part of this overall stormwater management effort, the City plans to establish rules, zoning, or other guidance that encourages private property owners to create LID systems on their property that support the City's overall stormwater objectives⁸⁸. LID systems capture, treat, and slowly discharge stormwater runoff. LID features can either retain the stormwater and discharge to another disposal system (Bio Retention) or they can retain and infiltrate (Bio Infiltration) stormwater. Previous stormwater modeling provided areas where either or both types of LIDs could be implemented. The modeling also indicated that at complete city buildout, the fully upgraded stormwater system with additional LID projects on private properties, could retain and infiltrate enough water so that use of the stormwater outfall could be discontinued. The amount of groundwater rise would also not put OWTS at risk which continues to be a concern of the City⁸⁹.

This project will eliminate the City's stormwater discharge by strategically infiltrating it in various locations that will not impact bluff stability. The City has taken great strides towards designing and implementing a stormwater system that will greatly benefit the ASBS around Trinidad Head. The City is encouraged to continue its efforts as funding allows and to keep involving and educating the public about the importance of proper stormwater drainage.

5.5 Streets & Roadways

Public streets and roads within the City limits are maintained by the Public Works Department. Major improvements to the City street system usually rely on State or federal grant opportunities. There are 3.3 miles of paved roads in Trinidad's jurisdiction⁹⁰ with no new roads planned. The City takes advantage of grants where possible each year, such as State Transportation Improvement Program (STIP) and SR3 funds. Maintenance schedule is generally as needed and as funding allows.

Planned Upgrades

The Trinidad Pavement Rehabilitation Slurry Project 2020 and Scenic Drive Striping Project are expected to be completed during FY 2020-21 through SB1 funding in the amount of approximately \$6,307⁹¹. The Slurry Project includes portions of Parker Street, Hector Street, Edwards Street, and Galindo Street and will involve pavement rehabilitation, slurry seal, pavement markings, and striping. The City has also received funding from Caltrans to develop a Local Road Safety Plan and anticipates proceeding with work in 2021.⁹²

⁸⁷ ibid

⁸⁸ ibid

⁸⁹ ibid

⁹⁰ ASCE 2014 Report Card for Humboldt County's Infrastructure

⁹¹ Trinidad City Council Agenda Packet. June 9, 2020.

⁹² Ibid

5.6 Parks & Recreation

The first City Park was constructed at the site of the Trinidad Cultural Center. “Saunders Park” is adjacent to the Trinidad Museum and the Trinidad Library, and is maintained by the Public Works Department⁹³. There are also tennis courts next to the Town Hall. The above facilities are all ADA accessible, but not fully compliant. Town Hall, the park, and the library are fully ADA compliant.

The playground space for Trinidad Elementary School is used informally as a recreational and park space but is only open to the public when school is not in session. The City of Trinidad has a lack of public recreation facilities oriented towards young children and teenagers. There have been discussions about additional facilities at the park, but the property doner placed limitations on the type of development that can be there (passive recreation only). There have been efforts towards building a skate park which have been met with mixed comments both for and against the park. Additionally, given the number of families that use the library in Saunders Park, a play structure next to the library could be a valuable addition to the community.

The City owns and maintains the Trinidad Cemetery, which is one of the City's designated historic sites. There are a limited number of burial sites available for sale to the public. City staff maintains the grounds of the Trinidad Cemetery. While the City does not arrange funeral services at the cemetery, the coordination of burial and the preparation of gravesites is a City responsibility⁹⁴.

The Open Space areas within and adjacent to the City are invaluable to both residents and for attracting tourists. They provide ample opportunities for outdoor recreation for all ages. The areas surrounding include Trinidad State Beach, College Cove, Patrick's Point State Park, Houda Point, Luffenholtz Beach, Bruno Groth Redwood Grove, Baker Beach, and Martin Creek Trail. These areas provide easy access and plenty of parking, and even hiking in some cases. Coastal cliffs and tidepools are amenities provided by the beaches. Some beaches in the area provide restrooms, picnic areas, camping, whale watching sites, agate hunting, and trails. There is also a full access boat launch and free beach launch for small boats and kayaks.

Trinidad Harbor

The City shares services with the Trinidad Rancheria for the Harbor. The property area is approximately 10 acres in nine individual parcels with ocean frontage both on the Pacific Ocean and Trinidad Bay. Most of the parcels are owned by the Trinidad Rancheria, but there is also U.S. Government and City Property as well. The City owns the land under the pier and mooring field to hold in trust for the people of the State. The State Lands Commission granted the harbor mooring area to the City to hold in trust for the people of the Sate. The City, in turn, has an agreement with the harbor facility owners to provide

⁹³ City of Trinidad website <http://trinidad.ca.gov/public-works-department>

⁹⁴ City of Trinidad website <http://trinidad.ca.gov/trinidad-city-cemetery>

mooring facilities and the City leases these tidelands to the Trinidad Rancheria⁹⁵. The Rancheria has applied to transfer their harbor ownership in Tribal Trust.

The primary use for the harbor area is to provide a working harbor for commercial and sport fishing. Recreational boating and public coastal access are also priority uses. Some of the current recreational uses include sea kayaking, sailing, party boating, and whale watching. Public access to the coast is available throughout the harbor area, providing continued public access and parking to adjacent beaches, trails, the pier, and Trinidad Head, as well as boat launching to Trinidad Bay. Trinidad's Harbor includes boat launch and moorings, shore boat service, boat tie ups, fishing tackle sales, restaurant, restrooms, and small convenience store⁹⁶. Additionally, there are several fishing charters in Trinidad offering both half-day and full-day fishing trips for salmon, rockfish, and other species such as halibut and Dungeness crab⁹⁷. The harbor provides access for commercial and recreational fishers, residents, and tourists to enjoy its coastal scenery and other amenities.

5.7 Law Enforcement

In June 2010, the law enforcement responsibilities of the Trinidad Police Department were transferred to the Humboldt County Sheriff's Office via a contract with the County Board of Supervisors.

Trinidad and Blue Lake have partnered to share one full-time equivalent officer. The City Council approved a 3-month contract (June 30, 2020 to September 30, 2020) for one full-time officer and one officer for 8-10 hours. Currently, there is no officer on patrol for the nighttime and weekends, which is the time-frame residents believe law enforcement services are most necessary. However, the County is currently short of officers and has not been able to provide the additional coverage.

The current Sheriff Deputy is stationed at the location of the former Trinidad Police Department at 463 Trinity Street. The office is normally open from 9:00am until 3:00pm, Mondays through Fridays and inquiries and complaints can still be filed at that location⁹⁸.

5.8 Fire Protection

The Trinidad City Fire Department is a volunteer fire department that provides fire and rescue services to the City of Trinidad. Cities are obligated to establish departments to provide fire protection services, unless included within the boundaries of an established fire protection district. Currently, the Trinidad VFD has 7 volunteer firefighters (2 is typical EMS response) and operates a Type-1 fire engine, a Type 4 4x4, and a Type 7 rescue vehicle. The Trinidad VFD, like most local fire departments in the County, depends on

⁹⁵ Harbor Area Planning Meetings April 2017.

⁹⁶ California Division of Boating and Waterways <http://www.dbw.ca.gov/BoatingFacilities/Details/39>

⁹⁷ Seascapes Pier and Harbor website <http://www.seascapes-pier.com/>

⁹⁸ City of Trinidad website <http://trinidad.ca.gov/police-department>

volunteers and has indicated that recruiting and retaining volunteers is a significant challenge especially given the small and aging population of the City of Trinidad.

The Trinidad VFD responds to over 50 calls per year and may be called for mutual aid to incidents within County Service Area 4⁹⁹ (which extends from Dows Prairie in the south to Freshwater Lagoon in the north and excludes the Trinidad Rancheria and the City of Trinidad), when more equipment and firefighters are needed than a CAL FIRE engine can provide. In return, Trinidad VFD may call CAL FIRE and Westhaven VFD to provide mutual aid support for larger incidents such as structure fires. In the last several years Trinidad VFD responded to several calls per year within CSA 4 during the fire and non-fire season, mostly along Scenic Drive south of the City boundary. The CAL FIRE Trinidad station responds to almost all calls within the City of Trinidad during the fire and non-fire season.

The City of Trinidad and the Trinidad Rancheria are both beneficiaries of the Amador agreement between CSA 4 and CAL FIRE¹⁰⁰, as well as, to a lesser extent, services provided by the Westhaven VFD and the Arcata FPD. The Trinidad Rancheria does not currently have its own fire department nor are there agreements in place to compensate neighboring service providers for their response. The Rancheria recognizes the need for its own fire department or the establishment of contracts with nearby fire service providers and is currently considering a range of options. With plans for the construction of a multi-story hotel, this need is particularly pressing. Should the current five story design be constructed, the building will be required to meet the fire code, which would require sprinklers at a minimum. Available staffing to be able to respond in an emergency and proper equipment to pump the volume of water needed for a fire, as well as reliable water supply for fires, is all critical for a multi-story building. There is no requirement for a fire department to have a ladder truck. If a fire department is rated by ISO and seeks the best possible rating, a ladder truck may be needed. ISO considers the number of buildings over a certain height, the volume of water needed, and mutual aid capabilities.

CAL FIRE responds to almost all calls within the City of Trinidad (during both the fire season and the off season, supported by CSA 4). This could be considered mutual aid, but CAL FIRE responds to substantially more calls to Trinidad than the Trinidad VFD responds to calls in CSA 4. There even appear to be calls within the City of Trinidad to which CAL FIRE is the only responder. For that reason, some type of compensation plan level of ongoing

⁹⁹ CSA 4 is a dependent district governed by the Humboldt County Board of Supervisors who serves as its Board of Directors. CSA 4 is approximately 18,200 acres in area (about 28.5 square miles) and extends approximately 19.5 miles along the U.S. 101 corridor from south to north from about 1 mile south of Little River in the south to north end of Freshwater Lagoon in the north. Since its formation in 1986, the revenue used to support services within CSA 4 is collected through a special assessment on property, where the cost of services is allocated according to "units of benefit" to owners of property within the district and increases annually by the consumer price index. The current value of a unit of benefit is \$41.92. This means that a parcel with a single-family residence, which receives four units of benefit, pays \$167.68 per year to generate revenue for the provision of fire services.

¹⁰⁰ Fire protection services are currently provided to CSA 4 through a cooperative agreement with the CAL FIRE Humboldt-Del Norte Unit to continue services from the CAL FIRE Trinidad fire station during the non-fire season. Without the agreement, the station would close during this time. This arrangement is referred to as an "Amador" agreement.

contribution needs to be explored for services provided by CSA 4 resources or some other arrangement to sustain the network of fire services for the whole area. This could range from a pay per call arrangement to annexing the city for purposes of fire protection into CSA 4. This would help support the current Amador agreement, which covers the period of July 1, 2020 through June 30, 2021, provides for non-fire season fire protection services from CAL FIRE within the CSA boundaries. As mentioned previously, the City has agreed to provide domestic water service to the CAL FIRE station, which is planned for construction in the summer of 2021. While it is not monetary support, it is a portion of the City's limited supply and CAL FIRE has indicated that the water service is essential to the station's operation (they may have had to reduce staffing or move the station without it).

According to the agreement scope of work, the Amador agreement is intended to provide "mutually advantageous fire and emergency services through an effective consolidated organization, wherein the state is primarily financially responsible for protecting natural resources from vegetation fires and the local agency is primarily financially responsible for protecting life and property from fires and other emergencies." The cost of the non-fire season services provided by CAL FIRE can vary from about \$150,000 to \$200,000, depending upon the length of fire season. The longer fire season lasts, the shorter the period will be during which CAL FIRE bills the CSA for non-fire season services. Fire season has historically been from July through October, but in 2019 fire season ended on the 9th of December and began on May 25, 2020. The CSA 4 special assessment revenue is generally adequate to cover the costs of the Amador agreement; however there have been years for which additional general funds were used to cover shortfalls.

The current Amador agreement is intended to result in at least two firefighters on an engine at the Trinidad CAL FIRE station at all times during the non-fire season. CAL FIRE firefighters retained for the Amador agreement, rather than being laid off at the end of fire season like most seasonal CAL FIRE employees and are highly trained and typically very experienced. The number of firefighters on duty will vary from 2-3 depending upon vacation, sick leave, and other CAL FIRE staffing requirements. CAL FIRE has equipped its typical "Type 3"¹⁰¹ engine in a manner more similar to a municipal fire engine suited for structure fire protection. Unlike other CAL FIRE engines, the engine funded through the Amador agreement carries tools for traffic collision victim extrication, technical rescue, and for structure firefighting. However, due to the design of a CAL FIRE Type 3 engine, only a 20 foot ground ladder can be carried, rather than the minimum 24 foot ground ladder carried on typical municipal fire engines. The 20 foot ladder length limits firefighter's ability to reach roofs for ventilation operations and upper floor windows for rescue.

¹⁰¹ The National Wildfire Coordinating Group established standards for fire engine typing and identifies Type 3 through 7 as wildland engines where a lower type number indicates greater seating and pump capacity and a more extensive hose complement, and Types 1 and 2 are considered structure firefighting engines.

CAL FIRE Humboldt Del Norte Unit/CSA 4 recently became a signatory of the “Automatic Mutual Aid Agreement for the North Humboldt Bay Region Fire Agencies” established in October of 2020. The agreement was entered into with seven other fire service providers, including Westhaven VFD, Arcata Fire, Blue Lake Fire, CAL FIRE (Trinidad Station/CSA 4), Fieldbrook Fire, Humboldt Bay Fire, Samoa Peninsula Fire, and Kneeland Fire. Under this agreement all signatories agree to respond to incidents in a way that provides the fastest response time without regard for jurisdictional boundaries. The agreement also specifies that signatories will coordinate joint trainings to ensure that the implementation of the agreement functions effectively. The City of Trinidad is a party to the countywide mutual aid agreement but is not a party to the Automatic Mutual Aid Agreement for the North Humboldt Bay Region Fire Agencies.

Currently the Humboldt County Board of Supervisor's Fire Services Ad Hoc Committee is evaluating sustainable service options for the CSA 4/Trinidad/Westhaven areas. As noted previously, the Amador agreement only guarantees services to the residents of CSA 4 during the non-fire season months and even during those months state mission takes precedent over agreement obligations if a choice needs to be made. The assessment paid by property owners does not support year-round services. In addition, CSA 4 will likely need to seek an increase to the special assessment to cover Amador contract costs as they may increase in coming years and outpace the amount of revenue collected. It could be difficult to raise enough revenue to cover all associated expenses. Therefore, it is uncertain whether there will be service delivery changes in the CSA area in coming years.

5.9 Emergency Planning

The City is developing a work plan and schedule for Local Hazard Mitigation Plan Actions¹⁰². Next steps include capital improvement planning and developing a funding strategy. The City also participates in the Humboldt County Operational Area Hazard Mitigation Plan 2019 and the Humboldt County Emergency Operations Plan (EOP) 2015 to prepare for emergencies. Some level of integration has already been established between local hazard mitigation planning and the following other local plans and programs: Zoning Ordinance, Subdivision Ordinance, Grading Ordinance, Certified General Plan/Local Coastal Program, and Draft General Plan/Local Coastal Program.

The Hazard Mitigation Plan uses long-term and short-term strategies to reduce or alleviate loss of life, personal injury, and property damage that can result from a disaster, such as landslides, earthquakes, and tsunamis. The plan includes an overview of population and demographics, critical facilities, critical infrastructure, and identifies risks for the county. It includes strategies that can mitigate impact of hazards, such as planning, policy changes, program, and projects.

¹⁰² Trinidad City Council Agenda Packet. June 9, 2020.

Risks evaluated in the plan include climate change, dam failure, drought, earthquake, flooding, landslides, severe weather, tsunami, and wildfire. Among the risks assessed, earthquakes (category-high, risk rating score-36), landslides (category-high, risk rating score-51), and wildfires (category-high, risk rating score-54) rated among the highest risk for the City of Trinidad. According to the sea-level risk assessment, none of Trinidad's population or structures will be exposed¹⁰³. Tsunamis were in the low category and ranked as 12 for the risk rating score. A large tsunami or earthquake could compromise Highway 101 both north and south of the City, cutting residents off from nearby towns and supplies. There is a tsunami warning system for the Pacific Ocean and local warning systems from the National Oceanic and Atmospheric Administration and the California Governor's Office of Emergency Services. Mitigation actions addressing these issues are prioritized in the action plan presented in Section 8.10 of the Hazard Mitigation Plan.

The EOP provides a framework for the Humboldt Operational Area agencies to respond to any emergency requiring multiagency participation and/or activation of the County Emergency Operations Center (EOC). All hazard-specific and topic-specific contingency plans complement and build on the EOP.

5.10 Other Service Providers

Planning services are contracted through SHN and the City employs a part-time building inspector. Engineering is contracted through GHD. Legal services are contracted through The Mitchell Law Firm. And financial services are contracted through Marcello and Company. Animal Control is also contracted out to the County. Additional services within the City are detailed below.

Schools

Schools in the Trinidad area include Trinidad Elementary School and Salmonberry Preschool located on the Trinidad Elementary School campus. Their services are supplemented by various private schools and programs of the Humboldt County Office of Education. Trinidad Elementary School has an enrollment of approximately 200 students in grades TK-8¹⁰⁴.

Library Services

The Trinidad library is located on Janis Court and provides information, reading, audio, and visual materials. The Library building is adjacent to the Trinidad Museum and is maintained by the Public Works Department. It is a branch of the Humboldt County Library. The land is all owned by the North Coast Land Trust. The library was built as a partnership between the City and the County and donations. The park is leased and managed and maintained by the City. The museum is managed by the museum society.

¹⁰³ Humboldt County Operational Area Hazard Mitigation Plan 2019 pages C17-C19.

¹⁰⁴ Trinidad Elementary School website

https://www.trinidadusd.net/apps/pages/index.jsp?uREC_ID=1499906&type=d&pREC_ID=1643933

Solid Waste Services

The City of Trinidad has franchised municipal solid waste collection services to Humboldt Sanitation. Humboldt Sanitation offers weekly trash collection services and bi-weekly recycling collection services to the communities of McKinleyville, Trinidad, Westhaven, Big Lagoon, and Orick.

Transit Services

The City is a member of the Humboldt Transit Authority (HTA), a JPA signed by Humboldt County and the cities of Arcata, Eureka, Fortuna, Rio Dell, and Trinidad. As such, all cities in the agreement are served by fixed route and dial-a-ride transit options that allow access through Humboldt County. The Redwood Transit Systems connects Trinidad southward to the ACV Airport, McKinleyville, Manila, Arcata, Eureka, Fields Landing, College of the Redwoods, Loleta, Fernbridge, Fortuna, Rio Dell, Scotia, Myers Flat, Garberville, and Benbow. The service runs approximately every two to three hours.

6.0 FINANCING

6.1 Financial Overview

The accounting policies of the City conform to national accounting principles as applied to government agencies. The Governmental Accounting Standards Board (GASB) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles.¹⁰⁵ The City operates as a self-governing local government unit within the State. It has limited authority to levy taxes and has the authority to determine user fees for the services that it provides. The City's main funding sources include sales taxes, other intergovernmental revenue from state and federal sources, user fees, and federal and state financial assistance.

6.2 Budget

The City follows these procedures in establishing the budgetary data reflected in the financial statements:

- Prior to the close of each fiscal year, the City Manager submits to the City Council a proposed operating budget for the fiscal year commencing the following July 1. The operating budget includes proposed revenue and expenditures.
- Public hearings are conducted at City Council meetings to obtain taxpayer comments prior to adoption of the budget in June.
- Prior to July 1, the budget is legally adopted for all governmental fund types through Council approved resolution.
- The City Manager is authorized to transfer budget amounts within and between funds as deemed desirable and necessary to meet the City's needs; however, revisions that alter the total expenditures must be approved by the City Council. Formal budgetary integration is employed as a management control device during the year for the governmental type funds.
- Budgets for the governmental type funds are adopted on a basis consistent with generally accepted accounting principles. Budgeted amounts presented are as originally adopted and as further amended by the City Council.

¹⁰⁵ City of Trinidad Annual Financial Report FY 2018-2019

Major Fund Types

The following are the City's major funds for FY 2018-19¹⁰⁶:

- General Fund: this fund is the City's primary operating fund. It accounts for all financial resources of the general government, except those required to be accounted for in another fund.
- Clean Beaches Grant: this fund is used to account for proceeds received from a State grant. Revenue is restricted for monitoring and management expenditures of biologically significant areas.
- Ocean Protection Council (OPC) Citywide Low Impact Development (LID) Grant: this planning and construction project is being funded by State Proposition 1 funds. Revenue is restricted for the design and construction of alternative street and storm water drainage flows¹⁰⁷.
- USDA Stormwater Grant: this fund is used to account for a federal grant that will be used to pay for the Project Engineering Report which is an integral part of the Storm Water Management Improvement Project, Phase 2 (ASBS Storm Water Project).

Revenues and Expenditures

As shown in Table 1 below, the City has experienced a gain in revenue in three out of five of the past fiscal years. It appears that expenditures related to administrative, public works, and water have steadily increased, and revenues related to property taxes, sales tax, and water funds have also increased.

¹⁰⁶ City of Trinidad Annual Financial Report FY 2018-2019

Table 7: City of Trinidad Five Year Financial Summary

Category	Budget FY 16/17	Budget FY 17/18	Budget FY 18/19	Budget FY 19/20	Budget FY 20/21
Revenue					
Property Tax	97,450	95,950	102,850	103,625	111,625
Rental Income	46,935	49,435	77,800	34,125	42,625
Sales tax	233,600	256,600	245,000	256,900	256,900
Motor Vehicle Fines	1,000	1,000	500	-	-
LAFCO	(1,500)	(1,750)	(1,850)	-	-
In Lieu VLF	20,000	20,000	30,000	28,500	28,500
Transient Occup. Tax	130,000	134,400	138,000	140,000	140,000
Interest Revenue	-	-	-	300	300
Interest Received	5,000	5,000	-	25,000	25,000
Grant Income	-	-	15,000	10,000	10,000
Interest Income	-	-	15,000	-	-
Other Misc Income	1,030	1,050	2,550	14,050	9,350
Application Processing	17,000	17,000	19,000	26,000	23,000
License/Permit Fee	17,100	17,100	18,100	18,700	19,300
Inter-dept Transfer	30,000	30,000	-	-	-
GF Total Revenue	597,615	625,785	661,950	657,200	666,600
Police Department	175,000	175,000	180,000	-	155,000
Water Fund	314,000	315,500	332,000	340,800	342,000
Cemetery	9,500	9,500	6,200	9,250	12,250
Integrated Waste Mgt	13,000	16,500	16,700	10,000	10,000
Fire Department	-	75,000	-	-	-
Gas Tax	-	33,106	15,851	18,000	15,000
Transp Devt Act	-	18,748	11,000	22,000	12,500
Total City Revenue	1,109,115	1,269,139	1,223,701	1,057,250	1,213,350
Expenditures					
Administrative	340,693.78	339,403	375,671.66	368,371	414,033
Public Works	165,337.44	175,616.19	166,793	174,801	202,013
Police Department	247,537.25	266,063	266,480.93	187,099	32,174
Fire Department	17,100	87,800	17,350	22,550	17,850
Water	307,075.00	296,616.91	333,071	383,506	366,692
Cemetery	25,258.9	26,013.31	23,413	17,125	15,702
Integrated Waste Mgt	20,800	21,572	22,077	17,175	14,094
Gas Tax	-	-	-	40,000	40,000
Transp Devt Act	-	-	-	12,000	12,000
Total Expenditures	1,123,802.37	1,213,084	1,204,857	1,222,627	1,114,558
Gain/Loss	\$(14,687.37)	\$70,799	\$8,007	\$(165,377)	\$98,792

Table 8: Statement of Revenue, Expenditures, and Change in Fund Balances

Category	Actual FY 2014/15	Actual FY 2015/16	Actual FY 2016/17	Actual FY 2017/18	Actual FY 2018/19
Revenue					
Intergovernmental	1,709,605	360,457	470,920	-	1,241,940
Property tax	91,053	92,709	97,465	104,313	108,414
Sales tax	181,943	250,368	246,438	316,837	295,403
Transient occupancy tax	120,816	127,794	171,173	140,100	140,583
Vehicle License Fee	-	-	-	29,764	32,426
Gas Tax	-	-	-	15,881	-
Licenses, planning, and permits	42,129	35,813	23,466	57,008	51,418
Grants Awarded	-	-	-	426,034	-
Rent and Franchise Fees	-	-	-	69,970	74,720
Use of property	43,006	53,741	48,472	-	-
Investment earnings	2,017	3,262	3,791	13,615	25,305
Other Revenue	8,288	28,314	23,600	16,913	12,632
Total Revenue	2,198,857	952,458	1,085,325	1,190,435	1,982,841
Expenditures					
General government	298,538	349,621	372,777	408,521	364,779
Public safety-police	176,340	196,685	191,162	237,781	264,817
Public safety-fire	18,025	7,196	10,911	81,933	-
Public works	165,225	176,660	191,478	153,284	159,956
Capital improvement projects	1,538,719	173,914	195,484	209,736	1,120,872
Total Expenditures	2,196,847	904,076	961,812	1,091,255	1,910,424
Gain/Loss	\$2,010	\$48,382	\$123,513	\$99,180	\$72,417

Intergovernmental revenue accounts for the largest share of revenue at \$1,241,940 or approximately 62% of the total revenue. Major funds contributing to the 2018-2019 Fiscal Year include revenue from the General Fund at \$802,750 followed by the Ocean Protection Council (OPC) Citywide Low Impact Development (LID) fund at \$649,816. Significant expenditures include the General Fund at \$616,496 and the OPC Citywide LID fund at \$648,816. Comparing the health of the budgets and audits, the City can build up reserves for future projects.

Table 9: Statement of Net Position

Statement of Net Position	FY 2014/15	FY 2015/16	FY 2016/17	FY 2017/18	FY 2018/19
Total Assets	7,428,232	7,844,742	7,348,677	7,370,412	7,396,542
Total Liabilities	116,575	147,472	165,208	114,719	256,758
Net investment in capital assets	4,940,282	5,217,970	4,615,525	4,487,221	4,285,920
Restricted	34,746	28,601	110,143	139,982	157,316
Unrestricted	2,336,629	2,450,699	2,457,801	2,628,490	2,696,548
Total Net Position	\$7,311,657	\$7,697,270	\$7,183,469	\$7,255,693	\$7,139,784

The net position of the City has remained relatively stable over the past five financial years at just above \$7 million. This indicates that the City has generally positive income and is able to continue paying down debt. As of June 30, 2019, the General Fund had an unassigned balance of \$ 446,246¹⁰⁸.

Special Funding Considerations

The City entered into an agreement with the County of Humboldt to provide law enforcement services within the City limits, payable in the amount of \$237,685¹⁰⁹ per year. The agreement period commences July 1, 2017 through June 30, 2020. Appropriations are partially funded through an annual State grant in the amount of \$148,000 and an annual County grant of \$75,000.

As of June 30, 2019, the City was committed to several grant funded contracts related to potable water quality, water treatment plant upgrades, onsite wastewater treatment services, street water runoff, and environmental related improvements. The ability of the City to meet its commitments is dependent upon continued intergovernmental grant funding.

The City entered into a 99-year lease agreement with the Trinidad Coastal Land Trust, for a building which is occupied by a branch of the Humboldt County Library. Annual rent is \$500 per year and adjusted every five years equal to a consumer price index.

In the normal course of City operations there are occasional and various legal claims and actions against the City for which no provision has been made in the financial statements because the amount of liability, if any, is unknown. The City has received state and federal funds for specific purposes that are subject to review and audit by the granter agencies. Although such audits could generate expenditure disallowances under terms of the grants, it is believed that any required reimbursements will not be material.

¹⁰⁸ Ibid

¹⁰⁹ City of Trinidad Annual Financial Report FY 2018-2019

Employee Retirement Funds

The City contributes to an employee-owned defined contribution plan administered through Smith Barney/Hartford ITT under established plan provisions, and which may be amended by City council resolution. The City contributes 6% of an employee's annual salary to the plan which provides retirement benefits. The City also provides matching contributions up to 6% of an employee's contributions for all eligible employees. Plan participants age 50 and older can make catch-up annual contributions up to \$5,000; and in the three years prior to retirement, can make catch-up contributions of up to twice the annual limit. All employee and employer contributions are tax deferred to the employee. The City contributed \$36,510 to the plan for the FY ending June 30, 2019. The fund balance at the end of FY 2019 was \$1,677,404¹¹⁰.

¹¹⁰ City of Trinidad Annual Financial Report FY 2018-2019

7.0 MUNICIPAL SERVICE REVIEW DETERMINATIONS

As set forth in Section 56430(a) of the CKH Act- To prepare and to update the SOI in accordance with Section 56425, the commission shall conduct a service review of the municipal services provided in the county or other appropriate area designated by the commission. The commission shall include in the area designated for a service review the county, the region, the sub-region, or any other geographic area as is appropriate for an analysis of the service or services to be reviewed, and shall prepare a written statement of its determinations with respect to each of the following:

(1) Growth and population projections for the affected area

- a) The City of Trinidad has an estimated population of 355. If the 0.15% growth rate is applied to the 2010 Census estimate of 367 people, then Trinidad would have a 2020 population of 373 people, and a 2030 population of 378.
- b) The City of Trinidad is not anticipating significant growth. Constraints to growth include limited access to the City's municipal water system, lack of a central wastewater treatment plant, environmental considerations, and lack of buildable land.

(2) The location and characteristics of any disadvantaged unincorporated communities within or contiguous to the sphere of influence

- a) The City of Trinidad has a MHI that is 107 percent of the statewide median household income of \$71,228. Therefore, it is not considered disadvantaged.
- b) The Trinidad Rancheria qualifies as an economically disadvantaged community.
- c) The community of Big Lagoon to the north and Westhaven to the south have a MHI that is 94 percent and 89 percent of the statewide MHI, respectively. Therefore, these communities are not considered disadvantaged.
- d) The land surrounding the City is all part of a Disadvantaged Community Tract (Number 06023010200), which includes the coastal region between Trinidad and the Del Norte County line, with a population of 2,611 and an MHI of \$48,454, 68 percent of California's reported \$71,228 MHI.

(3) Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies

- a) The City currently has limited capacity to meet additional water needs in the area due to treatment plant constraints and potentially limited supply from Luffenholtz Creek.

- b) The City of Trinidad does not have a central sewage collection or treatment system. Septic systems exist throughout the City, which provides a considerable constraint to economic growth.
- c) In late 2008, the City Council adopted an Onsite Wastewater Treatment Systems (OWTS) ordinance. This ordinance establishes a septic system maintenance program for property owners in the City. The City has lacked the staff to fully implement the OWTS program to date.
- d) The City currently does not have a Capital Improvement Program. The City may want to consider developing a CIP to help plan for future improvements.

(4) Financing ability of agencies to provide services

- a) As of June 30, 2019, the City had a total reserve amount of \$1,677,404. The City employs good business and financial practices and keeps adequate reserves to stay fiscally solvent.
- b) Based on available data, the city has adequate financial ability to provide services to customers within its jurisdictional boundaries.

(5) Status of and, opportunities for, shared facilities

- a) The City of Trinidad is the only incorporated community within 15 miles. The surrounding area is rural in nature and has a limited capacity for shared services.
- b) The City of Trinidad has a long-term relationship with the Trinidad Rancheria, which is supplied with water from the City and coordinates with the City from time to time on water improvement projects.
- c) The City has a long-term relationship with the Westhaven CSD. The City and District have been working together to develop and secure funding for water system and watershed improvements that serve to implement the Trinidad-Westhaven Coastal Watershed Plan and Humboldt County Community Wildfire Preparedness Plan. Collaborating on water system improvements is more cost effective and will lead to a closer working relationship between these neighboring water systems.
- d) The Trinidad Volunteer Fire Department (VFD) is a party to the countywide mutual aid agreement for emergency medical and fire protection services as are the Westhaven VFD and CSA #4. Currently, the CAL FIRE Trinidad station responds to almost all calls within the City of Trinidad during the fire and non-fire season with support from the Westhaven VFD. Currently the Humboldt County Board of Supervisor's Fire Services Ad Hoc Committee is evaluating sustainable service options for the CSA #4/Trinidad/Westhaven areas. The City of Trinidad should consider participating in this planning effort.

(6) Accountability for community service needs, including governmental structure and operational efficiencies

- a) The City of Trinidad maintains a website (www.trinidad.ca.gov) where it posts City information, agendas, documents, and updates.
- b) The City is currently served by a five-member City Council that is elected at large for staggered four-year terms.

(7) Any other matter related to effective or efficient service delivery

- a) There are currently 221 service connections within city limits and 101 connections outside city limits. Ongoing water services planning is necessary to address competing needs in the water service area and surrounding areas. The City is encouraged to continue assessing their water system for potential infrastructure upgrades and also to track water flows in Luffenholtz Creek to determine the seasonal flows of the creek. This can help the City to better evaluate the water source supply for current and future demands.

8.0 SPHERE OF INFLUENCE DETERMINATIONS

(1) Present and planned land uses in the area, including agricultural and open-space lands.

- a) The largest land uses within Trinidad are Open Space (OS) land encompassing Trinidad Head and beachfront areas, Special Environment (SE) uses, often in riparian and unstable areas, and Urban Residential (UR) and Suburban Residential (SR) parcels. Urban Residential uses dominate the central area within the City's boundaries. These parcels are concentrated in the City's interior northeast of Trinidad Head.
- b) There is no land designated Agricultural within City limits. The City is extremely coastal, and the environment is dominated by ocean influences. Open space uses within City limits and surrounding the City are important for drawing in visitors to the area.
- c) Land uses within the proposed SOI as part of the water service area include Commercial Recreation (CR), Residential Estates (RE), and Rural Residential (RR).

(2) Present and probable need for public facilities and services in the area.

- a) Given the low growth estimates for the City, there are no anticipated needs for the expansion of public services and facilities to accommodate future growth within city limits.
- b) There are currently 221 water service connections within city limits and 101 connections outside city limits. There have been additional requests for service, which indicates a need for water service in the surrounding area.
- c) The reliance of the City on OWTS (septic systems) for wastewater treatment and disposal poses a significant constraint to growth but there are currently no plans to construct a wastewater treatment plant currently. Expansion of the City's OWTS Management Program could benefit water quality.
- d) The Trinidad Rancheria is continuing to assess potential sources of water for a proposed hotel project. This may or may not include a connection with City. The City is encouraged to continue coordination efforts with the Rancheria and assess potential impacts on the City's water system from this proposed development project.

(3) Present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.

- a) The current capacity of public facilities provided by the City appear to be adequate to serve current demand. However, there is limited capacity to meet

any future demand from surrounding areas due to limited water supply and reliance on OWTS.

- b) According to GHD's 'Water Treatment Plant Production Rate Test and Analysis' (memo dated May 1, 2019), there is approximately 48,000 gpd of unused capacity at the City's water plant in its current configuration. This means the City only has about half the capacity needed to serve build-out in the City and the remainder of its service area during peak usage, not including the Rancheria's hotel.
- c) It should be recognized that build-out is not likely to occur inside or outside the City within the next 20 years, or the planning horizon of the updated General Plan.

(4) Existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.

- a) McKinleyville is the closest shopping and service industry hub for Trinidad residents.
- b) The Trinidad Rancheria, located southeast of the city's boundary, may be considered a community of interest.

(5) For an update of a sphere of influence of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere.

- a) The median household income for Trinidad is \$76,250, which is 107% of the statewide median household income. The City is therefore not considered to be a disadvantaged community.
- b) The land surrounding the City is all part of a Disadvantaged Community Tract which has ID Number 06023010200, a population of 2,611 and an MHI of \$48,454, 68 percent of California's reported \$71,228 MHI.
- c) Should future annexations or service extensions be proposed, special consideration will be given to any DUCs affected by the annexation consistent with GC §56375(8)(A) and LAFCo Policy.

Appendix A: References Cited

- 2016 Consumer confidence report:
<http://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/trinidad%20ccr%202016.pdf>
- 2016 Trinidad VFD Annual Report
- American Community Survey 5-year Estimates (2018), Table DP05 –Demographic and Housing Estimates. Accessed April 5, 2020.
https://data.census.gov/cedsci/table?q=population&g=1600000US0678715&hidePreview=false&tid=ACSDP5Y2018.DP05&vintage=2018&layer=VT_2018_160_00_PY_D1&cid=DP05_0001E&t=Populations%20and%20People&y=2018
- American Community Survey 5-year Estimates (2018), Table S1903 – Median Income in the Past 12 Months, California. Accessed April 5, 2020.
https://data.census.gov/cedsci/table?q=median%20income&g=1600000US0678715&tid=ACSST5Y2018.S1903&vintage=2018&layer=VT_2018_160_00_PY_D1&t=Income%20%28Households,%20Families,%20Individuals%29
- American Community Survey 5-year Estimates (2018), Table S1903 – Median Income in the Past 12 Months, California. Accessed April 5, 2020.
https://data.census.gov/cedsci/table?q=median%20income&tid=ACSST5Y2018.S1903&vintage=2018&layer=VT_2018_160_00_PY_D1&t=Income%20%28Households,%20Families,%20Individuals%29&g=0400000US06
- ASBS Stormwater Improvement Project. GHD. January 2012:
http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20160629/4b_Trinidad/4b_ExhibitD_MND_Trinidad.pdf
- ASCE 2014 Report Card for Humboldt County's Infrastructure
- Big Lagoon CSD MSR. Humboldt LAFCo. 2008: <http://humboldtlafo.org/wp-content/uploads/Big-Lagoon-CSD-ADOPTED-MSR-Sept-2008.pdf>
- Bureau of Land Management- California Coastal National Monument:
<https://www.blm.gov/programs/national-conservation-lands/california/california-coastal>
- California Coastal Commission memo 8-24-18 RE City of Trinidad LUP amendment No. LCP-1-TRN-17-0072-1 and County of Humboldt Land Use Plan Amendment No. LCP-1-HUM-17-0066-1 (CalFire Trinidad Fire Station Water Service Extension)
- California Division of Boating and Waterways
<http://www.dbw.ca.gov/BoatingFacilities/Details/39>
- City acreage and SOI areas. Jason Barnes, PlanWest GIS technician, excel spreadsheet
- City of Trinidad ABS Compliance Plan. City of Trinidad Stormwater Program Staff. September 20, 2013:
https://www.waterboards.ca.gov/water_issues/programs/ocean/docs/asbs_general_exception/trinidad_dcp_04302015.pdf
- City of Trinidad alternative raw water source evaluation. GHD Memorandum. September 6, 2019:
<https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/Trinidad%20Alternative%20Water%20Sources%20Analysis.pdf>
- City of Trinidad Annual Financial Report FY 2018-2019

- City of Trinidad ASBS Compliance Plan 2013:
https://www.waterboards.ca.gov/water_issues/programs/ocean/docs/asbs_general_exception/trinidad_dcp_04302015.pdf
- City of Trinidad Conceptual Hydrological Assessment of the Luffenholtz Creek Watershed. GHD Memorandum. September 6, 2019:
<https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/Trinidad%20Water%20Loss%20Analysis.pdf>
- City of Trinidad drinking water system model. GHD Memorandum. October 2019:
https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/Trinidad_Water_Model_w_Figs_0.pdf
- City of Trinidad General Plan Draft Circulation Element. SHN. 2012:
<http://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/PlanningCommission/GeneralPlanUpdate/circulation%20pc%20approved.pdf>
- City of Trinidad General Plan Draft Land Use Element Chapter 2. SHN. September 2009:
<https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/PlanningCommission/GeneralPlanUpdate/land%20use%20w%20figures.pdf>
- City of Trinidad Housing Element 2019-2027.Placeworks. March 2020:
http://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/Trinidad_Final_Adopted_HE_4-14-20.pdf
- City of Trinidad LCP. City of Trinidad Planning and Building Services.1980
- City of Trinidad OWTS Ordinance: <https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/ordinance%202010-10%20owts%20final.pdf>
- City of Trinidad website: <http://trinidad.ca.gov/>
- City of Trinidad, CA Annual Financial Report for FY ended June 30, 2017
- City of Trinidad. OWTS Management Program:
<https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/owts%20process%20summary%200213.pdf>
- Comparative Performance Activity Report. Humboldt Transit Authority. August 2018.
- Department of Water Resources Disadvantaged Community Mapping Tool:
<https://gis.water.ca.gov/app/dacs/>
- Eel River Valley- Lost Coast Regional Fire MSR. Humboldt LAFCo. 2017
- Humboldt General Plan, Volume II, Trinidad Area Plan of the Humboldt County Local Coastal Program, Section 3.23 – Public Services. April 2007.
- Memorandum to Dan Berman from Rebecca Crow RE Waterline Extension to Calfire. GHD. 2017
- Orick CSD MSR. Humboldt LAFCo. 2007: <http://humboldtlafo.org/wp-content/uploads/Orick-CSD-ADOPTED-MSR-March-2008.pdf>
- OWTS Program 2013: <https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/where%20weve%20been%200213.pdf>
- Program Final Environmental Impact Report SCH# 2011012042 Exception to the California Ocean Plan for Areas of Special Biological Significance Waste Discharge Prohibition for Storm Water and Nonpoint Source Discharges, with Special Protections. February 21, 2012:
https://www.waterboards.ca.gov/water_issues/programs/ocean/asbs/docs/asbs_eir022112clean.pdf

- Report for Trinidad ASBS Stormwater Project Groundwater Model Addendum For LID Zoning. GHD. January 2019:
http://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/Groundwater_Modeling%20Addendum%20for%20LID%20Zoning_February2019.pdf
- Salmonberry Preschool website: <https://salmonberryschool.org/faq/>
- Seascape Pier and Harbor website: <http://www.seascape-pier.com/>
- Sperling's Best Places: <https://www.bestplaces.net/climate/city/california/trinidad>
- Trinidad Area Plan of the Humboldt County Local Coastal Program. Humboldt County Planning Department. Certified 5-1-83.
- Trinidad Bay Watershed Council: <http://www.trinidadwatersheds.org/asbs/>
- Trinidad City Council Agenda Packet. June 9, 2020:
<https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/06-09-2020%20cc%20packet.pdf>
- Trinidad Elementary School website:
https://www.trinidadusd.net/apps/pages/index.jsp?uREC_ID=1499906&type=d&pREC_ID=1643933
- Trinidad MSR. Humboldt LAFCo. 2008: <http://humboldtlafo.org/wp-content/uploads/Trinidad-ADOPTED-MSR-2008.pdf>
- Trinidad-Westhaven Coastal Water Quality Restoration Program/OWTS Emphasis: Clean Beaches Initiative Grant Final Report. City of Trinidad. December 2010.
- USDA Rural Funding Application. GHD. January 4, 2018:
http://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/Storm%20Water%20Project%202019%20Engineering%20Report%20011018_0.pdf
- Water Demand Assessment. SHN. August 2019:
<https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/20190826-WaterDemAssmt.pdf>
- Water Treatment Plant Production Rate Test and Analysis. GHD Memorandum. May 1, 2019:
<https://trinidad.ca.gov/sites/trinidad.ca.gov/files/library/Water%20Production%20Memo%20May%201%202019.pdf>

RESOLUTION NO. 21-06**APPROVING THE CITY OF TRINIDAD
MUNICIPAL SERVICE REVIEW AND SPHERE OF INFLUENCE UPDATE**

WHEREAS, the Humboldt Local Agency Formation Commission, hereinafter referred to as the "Commission", is authorized to conduct municipal service reviews and establish, amend, and update spheres of influence for local governmental agencies whose jurisdictions are within Humboldt County; and

WHEREAS, the Commission conducted a municipal service review to evaluate the Availability, capacity and efficiency of governmental services provided by the City of Trinidad, hereinafter referred to as the "City", pursuant to California Government Code Section 56430; and

WHEREAS, the Commission conducted a sphere of influence update for the City pursuant to California Government Code Section 56425; and

WHEREAS, the Executive Officer gave sufficient notice of a public hearing to be conducted by the Commission in the form and manner provided by law; and

WHEREAS, the staff report and recommendations on the municipal service review and sphere of influence update were presented to the Commission in the form and manner prescribed by law; and

WHEREAS, the Commission heard and fully considered all the evidence presented at a public hearing held on the municipal service review and sphere of influence update on January 20, 2021; and

WHEREAS, the Commission continued the public hearing on March 17, 2021 in order to receive additional evidence provided by staff; and

WHEREAS, the Commission considered all the factors required under California Government Code Section 56430 and 56425.

NOW, THEREFORE, BE IT RESOLVED by the Commission as follows:

1. The Commission, as Lead Agency, finds the municipal service review is exempt from further review under the California Environmental Quality Act pursuant to Title 14 California Code of Regulations Section 15306. This finding is based on the use of the municipal service review as a data collection and service evaluation study. The information contained within the municipal service review may be used to consider future actions that will be subject to additional environmental review.

2. The Commission, as Lead Agency, finds the sphere of influence update is exempt from further review under the California Environmental Quality Act pursuant to Title 14 California Code of Regulations Section 15061(b)(3). This finding is based on the Commission determining with certainty the update will have no possibility of significantly affecting the environment given no new land use or municipal service authority is granted.
3. This municipal service review and sphere of influence update is assigned the following distinctive short-term designation: "City of Trinidad MSR/SOI Update 2021".
4. Pursuant to Government Code Section 56430(a), the Commission makes the written statement of determinations included in the municipal service review, hereby incorporated by reference.
5. Pursuant to Government Code Section 56425(e), the Commission makes the written statement of determinations included in the sphere of influence update, hereby incorporated by reference.
6. The Executive Officer shall revise the official records of the Commission to reflect this update of the sphere of influence for the City.

BE IT FUTHER RESOLVED that the City of Trindad MSR/SOI Update 2021 is hereby approved and incorporated herein by reference and the sphere of influence for the City is altered as depicted in Exhibit "A", attached hereto.

PASSED AND ADOPTED at a regular meeting of the Humboldt Local Agency Formation Commission on the 17th day of March 2021, by the following roll call vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

Virginia Bass, Chair
Humboldt LAFCo

Attest:

Colette Santsche, Executive Officer
Humboldt LAFCo