

November 6, 2023

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Westhaven Community Services District
446B Sixth Street
Trinidad, California 95570

Attention: Paul Rosenblatt, General Manager

Subject: Biological and Rare Plant Survey Revisions
City of Trinidad/Westhaven CSD Emergency Intertie Project

Dear Paul Rosenblatt:

Thank you for providing comments on the Biological and Rare Plant Survey Technical Memorandum (Biological Report), prepared on April 19, 2023, for the City of Trinidad/Westhaven Community Services District (CSD) Emergency Intertie Project (Project). LACO understands the report was reviewed by Westhaven CSD's consultant, GHD. Comments were provided to LACO on September 7, 2023. The purpose of this letter is to memorialize how the comments were addressed in the revised Biological Report, which is enclosed for your reference.

The individual comments are provided in italicized text, with a summarized response below:

- We typically see a nine quad search, not one quad. (Page 2)*
A single quad database search is considered appropriate in this case, as the project disturbance would be limited to the existing roadway and public right-of-way. This has been added to page 2 of the Biological Report.
- Clarify if this is in reference to the plant survey or the creature survey. I assume plants. Typically we see additional information here regarding qualifications of personnel, dates of survey, protocol vs non protocol, and confirmation that both early and late blooming period surveys were completed. For the creature biology survey, we typically also see information about personally [sic] quals and survey date/time. (Page 2)*
In this case, the "biological survey" reference refers to both the plant and wildlife surveys conducted. The first paragraph under Section 2.0 Methodology notes the timing of the survey (March 17, 2023) and includes Mr. Lester's qualifications. The third paragraph further notes that the survey was conducted following CDFW protocol and that the survey was both intuitively controlled and seasonally appropriate. No changes were made to the Biological Report.
- Typically we see Monarch pop up in these tables now, perhaps not here because only a one-quad search was completed. (Page 6)*
No monarch host plants (milkweed) or significant flowering food plants are in the project area. No changes were made to the Biological Report.

4. *Also, we should be seeing the fish in this table (salmonids). There are a number of stream crossings involved in the project. Recommend noting if they are/are not fish bearing and whether or not special status aquatic species potentially present. (Page 6)*
The streams located near the project area do not contain sensitive anadromous fish as they are inaccessible for ocean-going species, such as salmonids. Additional discussion has been added under Section 4.2 *Potential Sensitive Wildlife Species Present* to notate this information. The expected sensitive amphibians are addressed in Table 2 of the Report.
5. *Please confirm the fire hydrants won't be located beyond the gravel on the side of the road. (Page 7)*
This has been addressed throughout the Report. All references to the hydrants have been updated to reflect they will be "flushing hydrants". Additionally, it is noted that the flushing hydrants would be installed on the existing road shoulder in the Westhaven Drive right-of-way within existing roadside pull-outs, which are noted to be adequately rocked.
6. *Mention of wetland mapping is absent, although figure captions reference wetland conditions. From our prior work along Westhaven Road, we would expect some of the roadside ditches would class out as wetlands. Have these areas been mapped? Would wetlands be impacted temporarily or permanently? (Page 7)*
Westhaven Drive roadside ditches do occur; however, no work will occur in the roadside ditches. Furthermore, no wetlands will be permanently or temporarily impacted under the project. Construction best management practices to avoid construction materials and equipment being placed in seasonal wetlands will be observed, and additional clarification has been added under Section 5.3 *Environmentally Sensitive Habitat Areas* and Section 6.0 *Conclusions and Recommendations*.
7. *We typically see Sensitive Natural Community mapping results reported under ESHA when working in the coastal zone. Were SNCs mapped? Will they be affected by the project? Many of the tree species noted in the Environmental Setting section are often included in SNC habitat mapped in this area? (Page 7)*
No Sensitive Natural Communities will be affected by the project, as all work is to occur within the existing roadway or in the Westhaven Drive right-of-way. Additional clarification has been added under Section 5.3 *Environmentally Sensitive Habitat Areas* and Section 6.0 *Conclusions and Recommendations*.
8. *In the Trinidad Area Plan, riparian corridors are defined as 100 ft measured as the horizontal distance from the stream transition line on both sides. Thus, any veg removed within this 200 ft corridor is in fact riparian. Worth double checking. (Page 7)*
No riparian vegetation will be removed or impacted under the project. Additional clarification has been added under Section 5.3 *Environmentally Sensitive Habitat Areas* and Section 6.0 *Conclusions and Recommendations*.
9. *Recommend confirming this remains true of the hydrant improvements as well. From the photos, it does not appear to be the case. (Page 7)*
The flushing hydrants would be installed on the existing road shoulder in the Westhaven Drive right-of-way within existing roadside pull-outs, which are noted to be adequately rocked. Additional clarification has been added to the Report.

10. *We would typically specify the width of the buffers. (Page 7)*

Additional clarification has been added to Section 6.0 *Conclusions and Recommendations*. Riparian buffers will be placed at the tree drip line at each stream crossing along Westhaven Drive and no work shall extend beyond this point.

11. *We typically see the nesting bird window start on March 15 except for Caltrans and City of Arcata projects, which use a Feb 1 start date. Consider adjusting to provide more flexibility during the implementation phase. (Page 7)*

Date has been updated to March 15.

12. *We would typically also see measures to protect adjacent wetland habitats and special status amphibians. (Page 8)*

It is the professional opinion of LACO that the measures included under Section 6.0 *Conclusions and Recommendations* would be sufficient to ensure wetland habitats and special status amphibians are adequately protected.

Please let us know if you have any questions or request any further clarification in the Biological Report.

Sincerely,
LACO Associates



Gary Lester
Senior Biologist/Botanist



Megan Marruffo
Senior Planner/Project Manager