

Trinidad Pier Reconstruction Project

Trinidad Harbor, City of Trinidad – May 22, 2012

Permit/LCP #: CDP 1-07-046
 Hearing Date: January 15, 2010

Analyst: Jim Baskin, North Coast District
 Hearing Result: Approved with Conditions

Applicant/Project Name: Cher-ae Heights Indian Community of the Trinidad Rancheria

Project Location: Along the Trinidad Pier and within the adjoining Upland Support Area, at Trinidad Harbor, 1 Bay Street, Trinidad, Humboldt County

Project Status:

Construction Complete? No.
 Recommend Enforcement? No.

Condition Compliance Complete? No.
 Recommend Follow-up? No.

Project Description:

The project site is located within the open ocean waters of Trinidad Bay. This project entailed the complete demolition and reconstruction of the Trinidad Pier, including replacement of the creosote-treated pilings, and construction of a stormwater runoff treatment system to eliminate runoff from the pier. The pier that was demolished was a 540-foot-long, 24- to 26-foot wide wooden trestle and plank pier, supported on 215 12-inch-diameter creosote-treated piles. The new pier consists of a foundation of 18-inch-diameter steel-encased concrete piles, with cast-in-place concrete traverse framework “bents,” and an impermeable pre-fabricated concrete decking structure, of approximately the same exterior dimensions as the old pier.

In addition, several new small storage sheds and mechanical housing structures were erected on the new pier, and the existing drayage cranes, utility services, marine laboratory seawater intake lines, and water quality monitoring probes were upgraded or replaced.

The Trinidad Harbor area includes several environmentally sensitive habitat areas (ESHA) including kelp beds, sensitive salmonid species, and protected marine mammals. Runoff from the pier previously discharged directly to the Trinidad Head Area of Special Biological Significance (ASBS). All runoff from the new pier drains into inlets on the decking; this runoff is conveyed via PVC piping to a stormwater treatment vault, from which the runoff will flow to an infiltration gallery.

Staff Report: December 23, 2009 Staff Report, and January 14, 2010 Addendum to Staff Report.

<http://documents.coastal.ca.gov/reports/2010/1/F13a-1-2010.pdf>

Contacted Local Government Representative: Yes. City of Trinidad: Becky Price-Hall, Grant Administrator for City of Trinidad; and Bob Brown, City Planner for City of Trinidad.

Contacted Owner’s Representative: Yes. Jacque Hostler, Chief Executive Officer of the Trinidad Rancheria.

Table 1: Contact Log

DATE (2012)	PERSON	ROLE	SUBJECT	COMMENTS
April 11, 13, and 26. May 3 and 9.	Jim Baskin	CCC analyst, Eureka office	Discuss pier replacement and design of stormwater system	

DATE (2012)	PERSON	ROLE	SUBJECT	COMMENTS
May 13 and 22	Josh McKnight	Engineer, Trinity Valley Consulting	Meeting to discuss stormwater system design, and site visit	CCC staff suggested additional borings to determine groundwater levels
May 13 and 22	John Roberts	Building Inspector, City of Trinidad	Meeting to discuss stormwater system design, , and site visit	
May 22	Becky Price-Hall	Grant Administrator, City of Trinidad	Site visit	
May 13 and 22	Jacque Hostler	Chief Executive Officer of the Trinidad Rancheria.	Meeting to discuss stormwater system design, and site visit	
May 22	Angie Sturm	SWRCB, Division of Financial Assistance	Stormwater system design, and site visit	

History of Permitting: Coastal Commission hearing date January 15, 2010; project received approval with conditions. This project is part of a grant-funded brownfields cleanup remediation project to address creosote pollution from the creosote-treated piles. Local approvals that were received are the City of Trinidad Conditional Use Permit No. 2007-07; Design Review Approval No. 2007-07-DR (pier materials); and Design Review Approval No. 2009-03-DR (project signage).

Applicable Water Quality Policies:

In California, the Porter-Cologne Water Quality Control Act of 1962 (Porter-Cologne Act) is the principal law governing water quality in California. Discharges into the Pacific Ocean are regulated under the Water Quality Control Plan, Ocean Waters of California (California Ocean Plan, SWRCB 2005) and are the jurisdiction of the SWRCB. Stormwater runoff from the Trinidad Pier flows into the Trinidad Head Area of Special Biological Significance (ASBS), which is regulated by the SWRCB. The Public Resources Code states that nonpoint sources discharging into ASBSs must be controlled to the extent practicable.

The pier received a Coastal Development Permit from the Coastal Commission. Applicable California Coastal Act policies include 30230-30233:

30230: Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.

30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored through, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and substantial interference with surface

water flow, encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

30232: Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or the transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.

30233(a): The diking, filling, or dredging of open coastal waters, wetlands, estuaries, and lakes shall be permitted in accordance with other applicable provisions of this division, where there is no feasible less environmentally damaging alternative, and where feasible mitigation measures have been provided to minimize adverse environmental effects....

Water Quality Issues at the Site:

- Toxics from the creosote-treated pilings supporting the former pier leached into Trinidad Bay.
- Runoff from the former pervious pier deck, which potentially contained trash, fish waste, and hydrocarbon pollutants, flowed directly into the Bay and the Trinidad Head Area of Special Biological Significance (ASBS). Discharges to ASBSs are prohibited by the State Water Resources Control Board (SWRCB).
- Stormwater runoff from the Telonicher Marine Lab buildings and parking lot was discharged untreated to an outfall on the bay.
- The nearby Trinidad Beach has been closed periodically in recent years due to fecal coliform bacteria. Potential sources included runoff from the pier and from the Marine Lab.

Water Quality Permit Conditions:

Coastal Commission staff recommended that the Commission approve the project with the addition of several Special Conditions that address water quality issues. This recommendation was upheld by the Commission in the meeting held on January 15, 2010.

Special Condition 2: Included a requirement for CCC approval of final development plans, including building material specifications (such as the concrete decking material).

Special Condition No. 3: Required a run-off control plan and an erosion control plan, identifying appropriate construction-phase and permanent water Best Management Practices (BMPs) to be incorporated into the project to prevent potential impacts to water quality consistent with the Area of Special Biological Significance designation, and a hazardous materials spill prevention and clean-up plan detailing both the efforts to be taken and the materials and equipment available for preventing and responding to any accidental release of hazardous materials during construction of the coastal access facilities.

This condition required that the run-off control plan demonstrate that:

- (1) Runoff from the project shall not increase sedimentation into coastal waters;
- (2) Runoff from all pier decking and improvement impervious surfaces shall be directed/collected and conveyed into the centralized stormwater treatment system as illustrated on the approved project plans, consistent with the Trinidad Head ASBS discharge prohibitions;
- (3) Stormwater run-off from all parking areas, driveways, and other impervious surface improvements within the upland support facilities project area shall be collected and conveyed into either the centralized stormwater treatment system (as illustrated on the approved project

plans) or into other SWRCB-approved centralized biofiltration detention/treatment basin consistent with the Trinidad Head ASBS discharge prohibitions.

Special Condition No. 5: Set specific construction-phase performance standards to be followed during demolition and placement of the pier pilings, to further ensure that environmentally sensitive habitat and water quality impacts are avoided or minimized.

Water Quality Reports Reviewed:

Construction, Drainage, and Preliminary Runoff and Erosion Control Plans for Trinidad Rancheria – Trinidad Pier Reconstruction Project: Pacific Affiliates, November 15, 2007.

Biological Assessment – Trinidad Pier Replacement: Jones and Stokes, May 2009.

Mitigated Negative Declaration – Trinidad Pier Reconstruction Project: City of Trinidad, August 2007.

Site Visit: Staff: Vanessa Metz Date: May 22, 2012

Observations: A site inspection of the pier and stormwater treatment system was conducted on May 22, 2012. This site visit was attended by numerous participants in addition to CCC staff, including project engineers, the city building inspector, the city grant administrator, the Trinidad Rancheria’s Chief Executive officer, and the SWRCB’s Department of Financial Assistance (the granting agency).

The pier itself was almost completed, with the exception of some sections of railing. The stormwater treatment vault was in place, but the stormwater infiltration system has not yet been constructed.

- Pier pilings: All creosote-coated piles have been replaced by polymer-coated steel-encased cast concrete piles. This was part of a grant-funded brownfields cleanup remediation project, and has removed a significant source of chronic low-level marine pollution resulting from the former 215 creosote-treated piles. Marine life has already begun colonizing the steel-encased concrete piles.
- Trestle: The former pier’s wooden trestle has been replaced by cast-in-place concrete traverse framework “bents.” There is no preservative-treated wood used for this new support structure, which eliminates this potential source of NPS pollution.
- Decking: The former pier’s decking was constructed of wooden planks, through which runoff flowed directly to the bay. All wooden decking was replaced with pre-cast concrete decking. The concrete decking surface is now an impervious surface, thus eliminating runoff to the bay.
- Railings: Aluminum railings were installed, which will not contribute to NPS pollution such as preservative-treated wood or painted railings may do.
- Stormwater collection system: The stormwater runoff collection, conveyance, and treatment system is designed to meet the “no discharge” prohibition established for the Trinidad Head Area of Special Biological Significance in which the project site is located. Stormwater inlets were installed at intervals in the new concrete pier decking to collect all runoff from the pier. The inlets drain via PVC piping under the pier to the inland stormwater filtration system, which will discharge to an infiltration gallery (still under construction).

The pier’s stormwater inlets are fairly small (approximately 4-inches diameter), and the grating on the inlets appears to have rather small apertures. This may potentially lead to a problem with clogging from litter in heavy rains. A maintenance program that requires prompt inspection of the stormwater inlets during heavy rainfall would help prevent clogging. A maintenance program that regularly removes litter from the pier before rainfall events would also be beneficial.

- Fish-Cleaning Waste: The fish cleaning station that was previously present on the old pier is no longer there. Fish cleaning will not be allowed on the new pier, which will reduce potential pollutants from fish waste.
- Other NPS Pollutant Sources: The drayage cranes all appeared to be oozing a small amount of lubricant from the pivot points. Each crane is installed on a concrete base, without containment for spilled lubricants and hydraulic fluids around the base of the crane. A containment system to capture drips of lubricant from the cranes would be an improvement. The use of vegetable-oil-based lubricant and hydraulic fluid could also be considered.

In addition, the trash area of the adjacent restaurant is a potential source of pollutants, as the dumpsters were oozing liquid waste. The trash area has a concrete floor, but did not have a containment berm around it. Although the dumpsters did have lids, the trash area was not covered to protect from rainfall.

Table 2: Observations

BMP #	Description	Observations	Grade/ Follow Up
1	Replace creosote-coated pier pilings with steel-encased concrete piles	The pilings have been replaced. The polymer coating is intact. Marine life is colonizing the new pilings.	A
2	Replace wooden plank decking with impervious concrete	Completed. New decking is impervious, and drains to stormwater inlets.	A
3	Replace wooden trestle with concrete, and install aluminum railings	Completed. These structures will not contribute NPS pollution to the bay.	A
4	Install stormwater collection and conveyance system from decking	Completed. Question about whether stormwater inlets are sized appropriately, and if may potentially clog with litter during a heavy rainfall. [Photo 5-6]	C Follow-up check during heavy rainfall
5	Control of fish waste on pier	There will not be a fish-cleaning station on the new pier.	A
6	Control of other potential sources of NPS pollution.	Question about leakage of lubricant from drayage cranes [Photo7-8], and need of secondary containment for trash area of adjacent restaurant	C Follow-up to address leakage of fluids from cranes
7	Stormwater treatment system	Installed vault system. Not in operation yet.	B
8	Stormwater infiltration system	Not installed yet.	--
<p>*Observations include Plan Review information for inaccessible areas of the project. **Grades in relation to CCC and RWQCB requirements: A = Clearly Exceeds Reqts.; B = Clearly Meets Reqts.; C = Appears to Meet Reqts. (Need Info); D = Does Not Appear to Meet Reqts. (Need Info); F = Clearly Does Not Meet Reqts. (Consider Enforcement) Follow-up examples: None required; Date by which follow up is recommended; Enforcement recommended; Other</p>			

Discussion/Conclusions: The BMPs installed were functioning effectively.

Follow-up Visit Recommended?: Yes, it would be a good idea to observe the stormwater drainage inlets during a heavy rainfall to confirm their appropriate sizing. It would also be beneficial to get a copy of the maintenance plan for the pier, when completed. A follow-up with the city to address ways to potentially contain leakage of fluids from the cranes is recommended.

Trinidad Pier Site Visit Photos 5-22-12



Photo 1:
Trinidad Pier looking seaward, showing impervious concrete decking and aluminum railing.



Photo 2:
Trinidad Pier looking seaward. Stormwater piping runs along the outside of the pier to the stormwater treatment vault in the left foreground.



Photo 3: Polymer-coated steel-encased concrete piling supporting the pier. Two cranes are visible on the pier.



Photo 4: The paved area where the infiltration gallery for pier runoff will be located, next to the restaurant. The entrance to the pier is out of view to the left.

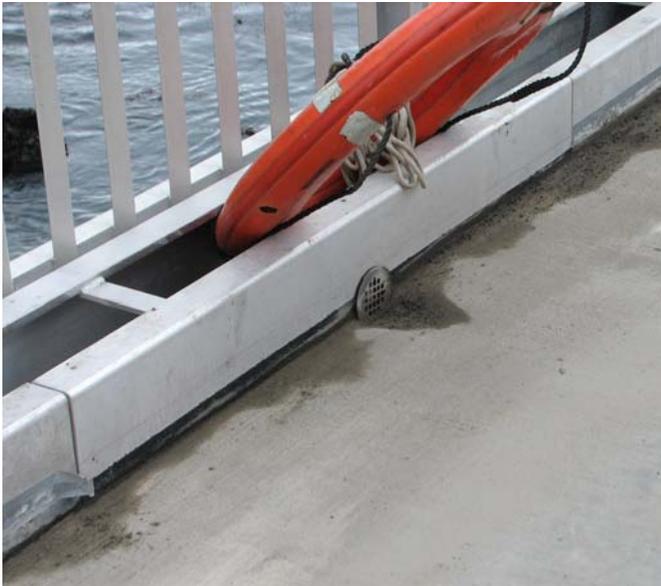


Photo 5:
One of several stormwater inlets on the pier.



Photo 6:
Close-up of a stormwater inlet on the pier.



Photo 7:
One of several drayage cranes on the pier. Note that there is no containment at the base for spilled lubricants and hydraulic fluids from the crane.



Photo 8:
Lubricant oozing from a crane on the pier.