

SUPPLEMENTAL INFORMATION

No. 4

For Planning Commission Agenda of:
March 4, 2010

- | | | | |
|-------------------------------------|-------------------------------|---|--------|
| <input type="checkbox"/> | Administrative Agenda Item | } | |
| <input type="checkbox"/> | Continued Public Hearing Item | } | |
| <input checked="" type="checkbox"/> | New Public Hearing Item | } | No. 11 |
| <input type="checkbox"/> | Old Business Item | } | |
| <input type="checkbox"/> | New Business Item | } | |

Re: Applicant: John and Katrin Homan
Case Nos.: FMS-08-02
File No.: APN: 515-191-37

Attached are the following:

- Letter to California Regional Water Quality Control Board (CRWQCB) dated February 17, 2010 including a response letter from LACO Associates dated February 10, 2010 and the original comment letter from CRWQCB dated February 3, 2010.
- Email from Mona Dougherty dated March 2, 2010 including as attachments a memo from the Division of Environmental Health dated March 1, 2010 and sheet 4 of the Tentative Map.
- Email from John Short dated March 4, 2010
- Memo from the Department of Public Works dated March 1, 2010 graphically depicting a 10 foot utility easement along the rear portion of the 50 foot setback line.

CRWQCB raised several issues regarding water quality both during construction and post construction. The above letters and emails represent the dialogue between the County and CRWQCB. The last email from John Short states that their concerns regarding water quality have been addressed. The following condition will be added to the conditions of approval and will be added to mitigation measure #17 in the Mitigated Negative Declaration pursuant to Section 15073.5.(c)(3) of the CEQA Guidelines:

"Low Impact Development (LID) is a site design strategy that seeks to mimic the pre-development site hydrology through infiltration, interception, reuse, and evapotranspiration. LID techniques include the use of small scale landscape-based best management practices (BMPs) such as vegetated natural filters and bioretention areas (e.g. vegetated swales and raingardens) to treat and infiltrate storm water runoff. LID also requires preservation and protection of environmentally sensitive site features such as riparian buffers, wetlands, steep slopes, valuable trees, flood plains, woodlands, native vegetation and permeable soils. The project shall incorporate LID by using landscape-based BMPs sized to treat and infiltrate the storm water runoff volume from all impervious surfaces (e.g. roads, roofs, walkways, patios) produced from:

- a. The volume of runoff from proposed impervious surfaces produced from the 85th percentile of 24-hour storm event, as determined from the local historical rainfall record; or*
- b. The volume of runoff from proposed impervious surfaces produced by the 85th percentile 24-hour rainfall event, determined using the maximized capture storm water volume for the area, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, p. 170-178 (1998); or*
- c. The volume of annual runoff from proposed impervious surfaces based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in California Storm Water Best Management Practices Handbook-Industrial/Commercial (1993).*

LID Features meeting the above standards shall be incorporated into the improvement plans for the proposed Major Subdivision and shall be sufficient to address all proposed impervious surfaces to be constructed with the final map improvements, including widening of the access road and installation of the shared driveways on Stagecoach Road.

The requirement for LID features meeting the above standards to be incorporated into future development plans shall be identified as a note on the face of the Final Map and noted on the Development Plan. They shall also be incorporated into the review of Coastal Development Permits, Building Permits and other development approvals subsequent to the proposed division of land."

Section 15073.5.(c)(2) of the CEQA Guidelines states that recirculation of a Negative Declaration is not required when "Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect."

Furthermore, Mitigation Measure #5 will be modified to increase the proposed wetland buffer from 50 feet to 100 feet.



COMMUNITY DEVELOPMENT SERVICES
PLANNING DIVISION
COUNTY OF HUMBOLDT

<http://co.humboldt.ca.us/CDS/Planning>

February 17, 2010

California Regional Water Quality Control Board
North Coast Region
Cathleen Goodwin
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403

RE: Response to Comments on the Mitigated Negative Declaration for the Homan Major Subdivision project, Humboldt County, SCH No. 2010012001

Dear Ms. Goodwin:

Thank you for your comments on the Mitigated Negative Declaration regarding the Homan Major Subdivision proposed in the Trinidad area. I forwarded your letter to the applicant's agent, LACO Associates, and they have provided a response which I have attached. A copy of the most recent site plan submittal has also been included as well as a CD containing the supporting technical studies. I feel that the attached letter provided by LACO Associates thoroughly addresses your concerns and offer it for your review.

Please call me at (707) 268-3740 if you have any questions regarding this letter.

Sincerely,

Trevor Estlow, Senior Planner
Community Development Services, Planning Division

C: John Short, CRWQCB, North Coast Region, 5550 Skylane Blvd, Ste. A, Santa Rosa, CA 95403

Encl: Letter from LACO Associated dated February 10, 2010
Tentative Subdivision Map (12 pages)
CD containing technical studies



LAGO ASSOCIATES
ENGINEERS • GEOLOGISTS • ENVIRONMENTAL CONSULTANTS

LEONARD M. OSBORNE • CE 38573
DAVID N. LINDBERG • PG 5581/CEG 1895
CHRISTOPHER J. WATT • PG 7586/CEG 2415
FRANK R. BICKNER • PG 7428
RONALD C. CHANEY, Ph.D. • CE 29027/GE 00934

February 10, 2010

6774.01

County of Humboldt
Community Development Services
Planning Division
3015 H Street
Eureka, California 95501

RECEIVED
FEB 2010
Humboldt County
Planning Div

Attention: Trevor Estlow, Project Planner

Subject: RWQCB Response to Homan Major Subdivision Initial Study

Dear Mr. Estlow:

Thank you for forwarding the February 3, 2010, letter you received from Cathleen Goodwin, Water Resources Engineer, representing the California Regional Water Quality Control Board (RWQCB) (attached). Ms. Goodwin's letter is in response to the Initial Study (SCH No. 2010012001) circulated for the Major Subdivision proposed by Dr. Homan for a 19 acre parcel located at 101 Anderson Lane, north of the City of Trinidad. As the applicant's agent for this project, we offer the following in hopes that it will be helpful to you as you prepare a more formal response to the RWQCB's comments. The responses are indexed to the marginal notes added to the attached copy of the RWQCB letter.

- 1) We will send Ms. Goodwin a full size set of the 12 page Major Subdivision Map as well as a CD containing PDF's of the various technical studies.
- 2) It is our expectation that the RWQCB will be more comfortable with the project once they have reviewed the technical reports. That said, this statement does not meet the critical test under CEQA of a "fair argument" that a potentially significant effect of the project may occur and has not been addressed.
- 3) Sheet 4 of 12 (Site Plan) identifies primary and reserve leach fields for each proposed lot. The identified leach fields conform to the mandatory setbacks from wells, property lines, and streams and are sized to comply with the standards of the Humboldt County Department of Environmental Health for single family residential construction.

- 4) The discussion of Section (e) could be expanded to note clearly that there are no existing or planned stormwater drainage systems in the vicinity of the project, thus, there is no potential to exceed the capacity of such systems. With regard to the potential for increased stormwater runoff to introduce pollutants to receiving waters we offer the following:

“Widening of the onsite access road, installation of driveways, and construction of single family residences on the subject site will create new impervious surfaces, reducing onsite infiltration. Paved surfaces have the potential to collect hydrocarbons and similar contaminants associated with driving surfaces. While impervious surfaces are expected to continue to account for a small (approximately 5%) portion of the site, there is a potential that increased runoff could reach the intermittent stream on the subject site.”

The RWQCB letter notes that mitigation of such effects is necessary “particularly for projects of this size.” It is not clear whether RWQCB is establishing a threshold based on the overall area of the project (19 acres) or the number of proposed lots (9). In either case, we concur with their recommendation that mitigation measures be included.

The mitigation section of the Hydrology and Water Quality Analysis includes a cross reference to Mitigation Measure 18 (in the Geology and Soils Section) but does not include a cross reference to Mitigation Measure 16 in the same section. Mitigation Measure 16 reads:

“The site shall be graded to provide positive drainage away from the foundation elements of all structures. A minimum gradient of one percent shall be maintained for all hardscaped areas. A three percent gradient shall be maintained for landscaped areas within 10-feet of a structure. The grading or landscaping design and construction shall be such that no water is allowed to pond anywhere on the site, nor to migrate beneath any structures. All roof storm drainage shall be controlled with the installation of gutters and downspouts. Downspouts shall be connected to tightlines to convey roof storm runoff away from a structure to a suitable outlet point. All outlet points should be armored with rock to act as energy dissipaters and control soil erosion. Runoff from hardscaped areas, including patios, and other impermeable surfaces shall also be contained, controlled and collected, and tight-lined to a suitable outlet point consisting of a drywell and/or gravel infiltration gallery.”

These measures were included in the Geology and Soils section as mitigation for potential erosion effects from increased runoff; however, they were intended to provide mitigation for water quality issues related to such runoff as well.

- 5) The proposed project includes LID measures as suggested. The access road will have 2-foot wide gravel shoulders which will slow runoff and encourage infiltration at the road edge. Development of impervious surfaces on only a relatively small (approximately 5%) percentage of the overall site will help to preserve existing runoff characteristics. Finally, the measures identified in Mitigation Measure No. 16 are all techniques typically associated with Low Impact Development.
- 6) As noted in the discussion section under the Hydrology and Water Quality Section:

"For the subject property, construction activities associated with the proposed residential developments may require compliance with the general permit for small construction activities (Order No. 99-08-DWQ). Small construction activities are defined as clearing, grading, or excavating activities that result in land disturbance between 1 and 5 acres; or activities that result in soil disturbances of less than one acre but are part of a larger common plan of development that encompasses one or more acres of soil disturbance. Compliance with the general permit during construction activities requires the following:

- *developing and implementing a Stormwater Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) for preventing pollutants from contacting with stormwater and controlling erosion during construction activities,*
- *eliminating or reducing non-stormwater discharges to storm sewer systems or other waters of the nation, and;*
- *conducting BMP inspections."*

While the development of each parcel will likely disturb an area less than one acre, we anticipate that a SWPPP will be required as a "common plan of development" of greater than one acre. As noted, the SWPPP will include the requirement to develop Best Management Practices (BMP's) which will be tailored to the extent and type of activity proposed at each stage of development.

CEQA practice for addressing requirements to comply with existing law varies considerably among lead and responsible agencies. In general, whether listed in the discussion section or in a mitigation measure, the critical determination is whether the regulations are sufficient to avoid the potential effect. RWQCB, in this case, essentially agrees with the Initial Study that BMP's will be required and that they will provide substantial water quality protections as they are applied to the project. To avoid confusion on this point in the future, it may be beneficial to discuss the issue directly with RWQCB.

- 7) We stand behind the analysis in the Winzler & Kelly Wetland Delineation study. The RWQCB encourages the use of a larger setback but does not provide an analysis which would indicate that the 50-foot setback from the isolated wetland would be insufficient to avoid a potentially significant effect to water quality or to biological resources. The method for calculating buffer zones is described in the Winzler & Kelly study in more detail. In short, it appears that Winzler & Kelly followed the methodology suggested by RWQCB in their comment letter.

If you have any questions, or if we can provide any additional information, please call me at (707) 443-5054

Sincerely,
LACO Associates



Randall S. Rouda, AICP
Senior Planner

RSR:tmc

Attachment

cc: John Homan, Client
Michael Nelson, LACO Associates
John Short, RWQCB
Cathleen Goodwin, RWQCB



**California Regional Water Quality Control Board
North Coast Region
Geoffrey M. Hales, Chairman**



Linda S. Adams
Secretary for
Environmental Protection

www.waterboards.ca.gov/northcoast
5550 Skylane Boulevard, Suite A, Santa Rosa, California 95403
Phone: (877) 721-9203 (toll free) • Office: (707) 576-2220 • FAX: (707) 523-0135

Arnold
Schwarzenegger
Governor

February 3, 2010

RECEIVED

FEB 03 2010

HUMBOLDT COUNTY
PLANNING COMMISSION

Mr. Trevor Estlow
Humboldt County Community Development
3015 H Street
Eureka, CA 95501

Dear Mr. Estlow:

Subject: Comments on the Mitigated Negative Declaration for the Homan Major Subdivision project, Humboldt County, SCH No. 2010012001

Thank you for the opportunity to comment on the Mitigated Negative Declaration (MND) for the Homan Major Subdivision project. The North Coast Regional Water Quality Control Board (Regional Water Board) is a responsible agency for this project, with jurisdiction over the quality of ground and surface waters (including wetlands) and the protection of the beneficial uses of such waters.

The project consists of the subdivision of a parcel 19 acres in size and the development of nine single-family homes. Wastewater treatment would be provided by individual on-site septic systems, and water would be supplied by onsite domestic wells. The project site is located within the coastal zone. An intermittent stream and wetlands, both associated and isolated, are present on the site.

1

The Regional Water Board received preliminary information on this project from an early referral in February of 2009, including a site map. We did not receive a site map with the MND received in January 2010. In addition, the MND makes reference to supplementary reports, including an on-site septic wastewater disposal feasibility investigation by Pacific Watershed Associates, a soils report, and a report by LACO Associates entitled "Aquifer Test Results for Domestic Wells DW-1 through DW-6." None of these reports were provided. Without these materials, we cannot offer specific comments. Some comments below reference the map received in 2009. Although we recognize that a current site map may include recent changes to the project, our comments stand until we receive updated information.

2

This project lacks sufficient mitigation for potential impacts to groundwater and surface waters from the proposed onsite septic systems and storm water runoff. Without the

California Environmental Protection Agency

Recycled Paper

2 | incorporation of further mitigation, the Regional Water Board does not support this project.

Comments

Wastewater

3 | The MND states that the development will be served by onsite septic systems with leachfields. The MND states that the aforementioned wastewater disposal feasibility investigation includes a map demonstrating that all mandatory setbacks can be met on each proposed lot. We did not receive a copy of the wastewater disposal feasibility report or the associated map. However, the site map included with the early referral does not appear to demonstrate that all mandatory setbacks can be met. Without an updated map that clearly shows the project site's capacity to maintain these setbacks, we cannot support the use of individual septic systems.

Storm water

4 | We do not feel that the assessment of impacts to Hydrology and Water Quality from storm water is sufficient. The potential impacts of increased storm water runoff flows upon receiving waters are not addressed or mitigated. Section (e) of the Thresholds of Significance for Hydrology and Water Quality on the CEQA Environmental Checklist is not addressed. Section (e) requests an analysis of the project's potential to "create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff." Mitigation for the impacts of storm water runoff is necessary, particularly for a project of this size located within the Coastal Zone with drainage occurring towards an onsite stream. The MND must address the project's potential to contribute additional sources of polluted runoff, both during and after construction activities.

5 | The Homan subdivision project will significantly increase impervious surface on the project site. Increases in impervious surface increase the quantity and impair the quality of storm water runoff. The project should utilize Low Impact Development (LID) techniques to mitigate for potential impacts. Emphasis should be placed on infiltration, evapotranspiration and biofiltration, and methods that retain and infiltrate runoff onsite should be incorporated into the project design. We have included a list of storm water and LID resources at the end of this letter for your reference.

6 | The MND notes that coverage under the general storm water construction activity permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). However, the MND also states that "while development will increase the area of impervious surfaces on the subject site, the large lot sizes ranging in size from 1.13 acres to 3.70 acres (average size of 2.1 acres) are anticipated to provide adequate area to manage the increased runoff without stormwater detention methods." No storm water mitigation is provided. The MND also states that Mitigation Measure 18 "addresses development standards for septic systems and is sufficient to

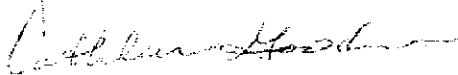
6. | reduce the potential impact to groundwater and surface water quality to less than significant." Mitigation Measure 18 states that four of the lots' septic systems will incorporate shallow Low-Pressurized Pipe distribution systems. This is not adequate mitigation for stormwater. This project must develop Best Management Practices and techniques to prevent storm water runoff for causing erosion and carrying sediment and pollutants to surface waters both during and after construction activities.

Surface waters

7. | The project proposes Streamside Management Areas of 100 feet from the stream and 50 feet from isolated wetlands. The Regional Water Board strongly encourages buffer zones of 100 feet from all surface waters, including the isolated wetlands. In addition, we would like to see language clarifying the method of measuring the buffer zones. Buffer zones should be measured from the top of bank, or from the edge of wetlands if there are wetlands adjacent to the stream.

If you have any questions or comments, you may contact John Short at (707) 576-2065 or jshort@waterboards.ca.gov.

Sincerely,



Cathleen Goodwin
Water Resources Engineer

020310_CMT_HomanSubdivision_MND

Estlow, Trevor

From: Mona Dougherty [MDougherty@waterboards.ca.gov]
Sent: Tuesday, March 02, 2010 5:41 PM
To: Estlow, Trevor
Cc: Cathleen Goodwin; Clara Turner; John Short
Subject: RE: NCRWQCB comments: Homan Major Subdivision

Hi Trevor,

Thanks for incorporating the storm water language. And we appreciate your specifications for how the LID BMPs will be implemented in the County system. That language addresses our concerns with the storm water treatment. We'll take a quick look at the information provided tomorrow about the onsite systems and the streamside management areas and get back to you. Thank you.

Mona Dougherty, P.E.
Water Resource Control Engineer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403
707-570-3761
mdougherty@waterboards.ca.gov
Fax: 707-523-0135

>>> "Estlow, Trevor" <TEstlow@co.humboldt.ca.us> 3/2/2010 9:29 AM >>>

Hi Mona-

I wanted to pass on this memo from David Spinoso, Senior Environmental Health Specialist regarding compliance with the Basin Plan. Also, I will forward you an email I received from Kathy Moley of Pacific Watershed Associates that includes more detail on the wastewater treatment systems. I'll send that separately.

Also attached is a page of the Tentative Map that depicts the Streamside Management Area and wetlands. All sensitive habitat areas will have a 100 foot setback. Note that the wetlands encompass areas beyond the stream so the resulting setback will be 100 feet from the edge of wetland and well over 100 feet from the stream. One thing to point out is that in the Trinidad Area Plan, Section 3.40.B.4 defines the Wetland Buffer as "The area between a wetland and the nearest paved road or the 40 foot contour line (as described from the 7.5' USGS contour maps) whichever is the shortest distance." You'll see on the attached map a little triangle shaped wetland at the intersection of Anderson Lane and the private road. This is where the earlier 50 foot setback was proposed but has been increased to 100 feet.

Finally, to incorporate your recommendations the following will be added to the mitigation measures/conditions of approval to address the LID requirement:

"Low Impact Development (LID) is a site design strategy that seeks to mimic the pre-development site hydrology through infiltration, interception, reuse, and evapotranspiration. LID techniques

include the use of small scale landscape-based best management practices (BMPs) such as vegetated natural filters and bioretention areas (e.g. vegetated swales and raingardens) to treat and infiltrate storm water runoff. LID also requires preservation and protection of environmentally sensitive site features such as riparian buffers, wetlands, steep slopes, valuable trees, flood plains, woodlands, native vegetation and permeable soils. The project shall incorporate LID by using landscape-based BMPs sized to treat and infiltrate the storm water runoff volume from all impervious surfaces (e.g. roads, roofs, walkways, patios) produced from:

- a. The volume of runoff from proposed impervious surfaces produced from the 85th percentile of 24-hour storm event, as determined from the local historical rainfall record; or*
- b. The volume of runoff from proposed impervious surfaces produced by the 85th percentile 24-hour rainfall event, determined using the maximized capture storm water volume for the area, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, p. 170-178 (1998); or*
- c. The volume of annual runoff from proposed impervious surfaces based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in California Storm Water Best Management Practices Handbook-Industrial/Commercial (1993).*

LID Features meeting the above standards shall be incorporated into the improvement plans for the proposed Major Subdivision and shall be sufficient to address all proposed impervious surfaces to be constructed with the final map improvements, including widening of the access road and installation of the shared driveways on Stagecoach Road.

The requirement for LID features meeting the above standards to be incorporated into future development plans shall be identified as a note on the face of the Final Map and noted on the Development Plan. They shall also be incorporated into the review of Coastal Development Permits, Building Permits and other development approvals subsequent to the proposed division of land."

To answer your last question, high flows (large storms) will also be infiltrated onsite, no new outfalls will be created.

I hope this satisfies your concerns regarding water quality during and post construction. If you could let me know if all of the issues have been addressed, I would greatly appreciate it. If at all possible to get something from you before Thursday night's meeting, that's even better. If you need any additional clarification, please don't hesitate to ask. Thanks again for helping to address these issues. This will definitely help with future projects.

Sincerely,

Trevor Estlow, Senior Planner
 County of Humboldt, Planning Division
 3015 H Street
 Eureka, CA 95501
 Phone: (707) 268-3740
 Fax: (707) 445-7446
 Email: testlow@co.humboldt.ca.us

-----Original Message-----

From: Mona Dougherty [mailto:MDougherty@waterboards.ca.gov]
Sent: Monday, March 01, 2010 5:08 PM
To: Estlow, Trevor
Cc: Cathleen Goodwin; Clara Turner; John Short
Subject: RE: NCRWQCB comments: Homan Major Subdivision

Hi Trevor,

I added one thing to the paragraph I wrote and sent you previously. I hope you can use this version when drafting the mitigation. Let me know if you have questions. Thanks.

Hi Trevor,

Thanks for the conversation today. And thank you for your efforts in resolving our questions about the onsite wastewater treatment and the setbacks to streams and wetlands. This is the type of mitigation/condition that could be added that would address our concerns with storm water treatment for the proposed project:

Low Impact Development (LID) is a site design strategy that seeks to mimic the pre-development site hydrology through infiltration, interception, reuse, and evapotranspiration. LID techniques include the use of small scale landscape-based best management practices (BMPs) such as vegetated natural filters and bioretention areas (e.g. vegetated swales and raingardens) to treat and infiltrate storm water runoff. LID also requires preservation and protection of environmentally sensitive site features such as riparian buffers, wetlands, steep slopes, valuable trees, flood plains, woodlands, native vegetation and permeable soils. The project shall incorporate LID and use landscape-based BMPs sized to treat and infiltrate the storm water runoff volume from all impervious surfaces (e.g. roads, roofs, walkways, patios) produced from the 85th percentile 24-hour storm event, as determined from the local historical rainfall record.

Also Trevor, if you could clarify if high flows (large storms) will also be infiltrated onsite or routed to another location for discharge, that would be great. If high flows will be discharged to a stream or wetland through a new outfall, additional permits may be needed from our office. Thanks.

Mona Dougherty, P.E.
Water Resource Control Engineer
North Coast Regional Water Quality Control Board
5550 Skylane Blvd, Suite A
Santa Rosa, CA 95403
707-570-3761
mdougherty@waterboards.ca.gov
Fax: 707-523-0135

>>> "Estlow, Trevor" <TEstlow@co.humboldt.ca.us> 2/17/2010 10:08 AM >>>
Hi Clara-

I have provided a response to the comment letter in response to Cathleen Goodwin's letter. I didn't have an email address for her so a hard copy will be sent in the mail. I believe all of the issues have been addressed. As far as BMPs are concerned, the following condition is included in the staff report which will be made public in a few days:

The applicant shall:

- a) use dust control techniques when excavating to minimize dust problems on adjacent parcels,
- b) reseed disturbed areas prior to winter rain, and
- c) take all precautions necessary to avoid the encroachment of dirt or debris on adjacent properties.

In addition, Best Management Practices for erosion and sediment control are to be utilized to minimize construction related impacts. These measures shall include:

- *Restricting ground disturbance to the dry season,
- *Installation of a silt fence on the downslope perimeter of the construction site,
- *Limiting the concentration of runoff and armoring any high velocity discharge areas,
- *Prohibiting downslope sidcasting of disturbed soils, and
- *Staging of equipment be conducted on paved areas above where possible.

I have attached the response letter, the tentative map and several studies. I will send a second email with the remaining studies as well as send a hard copy with a cd of all of the studies to Cathleen. Hopefully the files are not too large.

Please let me know if there are any questions or if you have any additional comments. If NCRWQCB can support the project, it would be helpful to have some documentation of that.

Thank you very much.

Sincerely,

Trevor Estlow, Senior Planner
County of Humboldt, Planning Division
3015 H Street
Eureka, CA 95501
Phone: (707) 268-3740
Fax: (707) 445-7446
Email: testlow@co.humboldt.ca.us

-----Original Message-----

From: Clara Turner [<mailto:CTurner@waterboards.ca.gov>]

Sent: Tuesday, February 02, 2010 1:24 PM
To: Estlow, Trevor
Subject: NCRWQCB comments: Homan Major Subdivision

Hello -

The Regional Water Board would like to comment on the Homan Major Subdivision MND. We have a draft letter but are waiting for a staff member to come back from an inspection and review it before it can be finalized. Supposedly he was going to be back by noon but so far no sign.

I will have a pdf sent either later today or early tomorrow. I'm sorry this is late and hope you can still consider the comments.

Thank you,

Clara Turner
North Coast Regional Water Quality Control Board
cturner@waterboards.ca.gov



Humboldt County Department of Health and Human Services Division of Environmental Health

100 H Street - Suite 100 - Eureka, CA 95501
Voice: 707-445-6215 - Fax: 707-441-5699 - Toll Free: 800-963-9241
envhealth@co.humboldt.ca.us

Memorandum

To: Trevor Estlow, Senior Planner
From: David Spinosa, Senior Environmental Health Specialist
Date: March 1, 2010
Subject: Homan Major Subdivision; FMS-08-02/CDP-08-25/SP-08-94
APN: 515-191-037



Soils testing to demonstrate suitable onsite wastewater treatment/disposal system locations for each parcel of the aforementioned subdivision was completed in accordance with the current North Coast Regional Water Quality Control Board **“Policy on the Control of Water Quality with Respect to On-site Waste Treatment and Disposal Practices”** (Basin Plan) by Pacific Watershed Associates. The policy sets forth region-wide criteria and guidelines to protect water quality and to preclude health hazards arising from the subsurface discharge of waste from on-site waste treatment/disposal systems.

California State Registered Environmental Health Specialists employed with the Humboldt County Division of Environmental Health (DEH) who've undergone specialized training and accumulated many years of practical experience in the design, installation and operation of onsite wastewater treatment/disposal systems conducted onsite evaluations of the work prepared by Pacific Watershed Associates and reviewed system design modifications prepared by LACO Associates. The on-site systems proposed were found to meet Basin Plan and Humboldt County requirements necessary for approval of that particular portion of the proposed subdivision.

DEH personnel were onsite during well construction and observed the sealing of several wells. Dry-weather water production testing data obtained from the wells (DW-1 through DW-6) was submitted for review and found to meet requirements necessary for DEH approval of the subdivision.

Estlow, Trevor

From: John Short [JShort@waterboards.ca.gov]
Sent: Thursday, March 04, 2010 8:03 AM
To: Estlow, Trevor
Cc: Clara Turner; Mona Dougherty
Subject: Homan Subdivision CEQA review

Trevor,

We have reviewed the additional information that you sent to us. It is our understanding is that the onsite wastewater treatment systems will fully comply with our Basin Plan requirements, the project has been updated to provide 100-foot setbacks to protect all stream and wetlands, and that the language in your previous email regarding storm water runoff treatment using Low Impact Development techniques will be added either to the MND or as a condition of approval for the project. Given this, our concerns about the project's potential impacts to water quality have been addressed. We very much appreciate your response to our comments and concerns.

