



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Pacific Regional Office
2800 Cottage Way, Room W-2820
Sacramento, CA 95825

IN REPLY REFER TO:
Environmental and Cultural Resources Management

September 10, 2020

Mr. John Ainsworth
Executive Director
California Coastal Commission
455 Market Street, Suite 228
San Francisco, California 94015

Dear Mr. Ainsworth,

On August 23, 2019, the California Coastal Commission (Commission) released a revised Staff Report and Findings (Staff Report) for the construction of a hotel on the Trinidad Rancheria, Humboldt County, California. In this report, the Commission granted conditional concurrence with the Bureau of Indian Affairs' (BIA) February 11, 2019 Consistency Determination (CS-0004-19). The Commission stipulated that for BIA to be fully consistent with Section 30250(a) of the Coastal Act the BIA would provide, prior to construction, evidence to the Executive Director of an adequate water supply along with an analysis of effects to coastal resources.

The Cher-Ae Heights Indian Community of the Trinidad Rancheria (Tribe) proposes to build and operate a five-story hotel adjacent to the existing Cher-Ae Heights Casino. The federal action for this project is the approval of a lease and loan guarantee, which requires BIA compliance with 15 CFR Part 930. The BIA prepared an environmental assessment examining the significance of effects resulting from the proposed project. As a result, the BIA published the Finding of No Significant Impact (FONSI) and Decision Notice for the project on August 26, 2020. The EA, FONSI and Decision Notice are available at <https://trinidad-rancheria.org/>.

Subsequent to the release of the Staff Report, the Tribe drilled two wells on the Rancheria, and commissioned studies to determine if long-term yields from these wells would adequately supply the hotel's water demand and if either well interferes with neighboring wells, therefore, causing significant effects to coastal resources. The water studies report is included as Appendix H in the final EA. Based on analysis of estimated well yields, the two wells would be able to supply 9,500 gallons of water per day or an estimated 6 gallons per minute. These yields sufficiently meet the water demand expectations the Tribe has for the project.

However, the water studies report does recommend that the Tribe investigate supplemental water

sources in the event demand exceeds current expectations or if there is a drop in groundwater levels. The Tribe has identified two viable options for emergency and unforeseen natural events including the development of a third well or incidental trucking.

The studies also considered effects to coastal resources resulting from the hotel's pumping demands. Specifically, how the corresponding cones of depression may affect neighboring wells. Based on the analysis in the studies, the estimated cones of depression would occur within 20 feet of what is referred as Well #1 and 50 feet of Well #2. Other private and/or commercial wells are outside the corresponding cones of depression suggesting no adverse effect to neighboring pumping rates.

Annual groundwater demand for the Tribe is 20 acre-feet/year. The City of Trinidad is currently supplying this resource to the Tribe. The operations and maintenance of the hotel requires an additional 11 acre-feet per year. The estimated total annual demand for the Tribe is 31 acre-feet/year. This demand is considerably below the estimated annual recharge volume of 174 acre-feet/year for the aquifer. Therefore, construction, operations and maintenance of the hotel will not result in significant effects to coastal resources.

Thank you for the opportunity to provide evidence that BIA is consistent with Section 30250(a) of the Coastal Act for the project. If you have any questions regarding our analysis and determination, please contact Dan Hall, Regional Archaeologist, at (916) 978-6041 or Felix Kitto, Regional Environmental Scientist, at (916) 978-6051.

Sincerely,

Regional Director