## **Summary Form for Electronic Document Submittal**

SCH #: \_\_\_\_\_

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

Project Title: Bay to Zoo Trail	
Lead Agency: City of Eureka	
Contact Name: Kristen M. Goetz	
Email: planning@ci.eureka.ca.gov	_ Phone Number: 707.441.4160
Project Location: Eureka, Humboldt  City	County
Project Description (Proposed actions, location, and/or consequences).	
The Bay to Zoo Trail is an inland-spur to the Eureka Waterfront Trail/Hur trails (also known as shared-use paths) providing non-motorized access throughout the Humboldt Bay region. The trail would connect the shores alignment parallel to Second Slough/McFarlan Creek and residential city 2.75 miles long. The northern-most point of the trail (origin) is located ne Slough (40°48'8.95"N, 124° 8'35.25") and the southern-most point of the Zoo (40°46'55.30"N, 124° 8'39.55"W.) The project is located within the c Guidelines Section 15072(g)(5), no known hazardous waste facilities or	for transportation and recreational use of Humboldt Bay to Sequoia Park Zoo via an extreets. The proposed trail is approximately ear the US 101 bridge crossing of the Eureka e trail (terminus) is located near the Sequoia Park eity limits of Eureka, California. Per CEQA
Identify the project's significant or potentially significant effects and briefl would reduce or avoid that effect.	y describe any proposed mitigation measures that
See attached draft MMRP.	

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.
None.
Provide a list of the responsible or trustee agencies for the project.
California Coastal Commission Coastal Development Permit
U.S. Army Corps of Engineers Clean Water Act Section 404 Permit , including consultation with NMFS under the Endangered Species Act, Magnuson-Stevens Fishery Conservation and Management Action Essential Fish Habitat Response and U.S. Fish and Wildlife Service
North Coast Regional Water Quality Control Board: Section 401 Water Quality Certification
California Department of Fish and Wildlife: Section 1602 Notification of Lake or Streambed Alteration
Humboldt Bay Harbor, Recreation and Conservation District: Development Permit.
City of Eureka Use Permit
City of Eureka Grading Permit
City of Eureka Encroachment Permit

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
EPA-1: Implement Geotechnical Design Recommendations  As part of the Project design process, the City would engage a California- registered Geotechnical Engineer to conduct a design-level geotechnical study for the Project. The City will design the Project to comply with the site-specific recommendations made in the Project's geotechnical report. This will include design in accordance with site preparation and grading recommendations included in the report. The geotechnical recommendations will be incorporated into the final plans and specifications for the Project, and will be implemented during construction.	Incorporate recommendat ions into final plans and/or specifications	City of Eureka	Verify all geotechnical study design recommendation s are incorporated into construction plan and/or specifications.
EPA-2: Stormwater Pollution Prevention Plan (SWPPP)  The Project will seek coverage under State Water Resources Control Board (Water Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. The City will submit permit registration documents (notice of intent, risk assessment, site maps, SWPPP, annual fee, and certifications) to the Water Board. The SWPPP will address pollutant sources, best management practices, and other requirements specified in the Order. The SWPPP will include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified Stormwater Developer (QSD) will prepare the SWPPP. A Qualified SWPPP Practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.	Create and implement SWPP	City of Eureka	Continual during construction
MM AQ-1: BMPs to Reduce Air Pollution  The contractor shall implement the following BMPs during construction:  1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered	Implement listed BMPs	City of Eureka	Continual during construction

Envir	onmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
	two times per day or as required by site conditions and current weather patterns.			
2.	All haul trucks transporting soil, sand, or other loose material off-site shall be covered.			
3.	All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day, or as needed to alleviate dust and debris on the roadway. The use of dry power sweeping is prohibited.			
4.	All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures.			
5.	All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.			
6.	Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points.			
7.	All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications.			
8.	Post a publicly visible sign with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The NCUAQMD's phone number shall also be visible to ensure compliance with applicable regulations.			
	IO-1: Avoidance and Protection Measures for Special-status Plants	Conduct	City of	Pre-construction
	ity of Eureka shall implement the following avoidance and protection ures for special-status plants:	preconstructi on surveys. Implement listed	Eureka	

Envir	onmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
1.	Pre-construction surveys for early-blooming species shall occur in March-April and other species from May to July prior to ground disturbance. Surveys shall follow CDFW rare plant survey protocols (CDFW 2018a).	protection measures.		
2.	The locations of any special status plant populations to be avoided shall be clearly identified in construction documents (Humboldt Bay owls clover and other tideland-related species found during pre-constructions surveys).			
3.	Locations of all special status plants will be submitted to CNDDB.			
4.	If avoidance of plants in the tidal areas, prior to and through flowering (seed production) is not feasible (work before late July-early August), then seeds shall be collected in annuals or otherwise mitigated in coordination with CDFW and consistent with this mitigation measure (items 5-7 below would apply). If work occurs after the sensitive plants in the tidal areas have gone to seed, then items 5-7 do not apply and not action is necessary (i.e., no seed collection and no dense-flowered cordgrass removal).			
5.	Humboldt Bay owl's clover seed's shall be collected within the disturbance footprint June-July, prior to Segment 1 construction or ground disturbance within the salt marsh. This task is not required if the construction activities would impact the plants after the plants have seeded themselves naturally.			
6.	Invasive Dense-flowered cordgrass shall be removed from the Second Slough saltmarsh after annual Humboldt Bay Owl's Clover has died back for the season (July-November) at an overall acreage equal to impacts to Humboldt Bay owl's clover, regardless of the density of the cordgrass, This task is not required if Humboldt Bay owl's clover has gone to seed prior to construction (disturbance of plants) as stated in five above.			
7.	Humboldt Bay owl's clover seed shall be redistributed in Second Slough high-marsh habitat in the fall after dense flowered cordgrass removal and trail construction related disturbance have concluded. This task is not required if protection measure number six, above, is not required.			

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
<ol><li>Impacts to Lyngbye's sedge and brackish habitat shall be minimized and the population on the east side of Segment 1 shall be avoided, if possible.</li></ol>			
<ol> <li>Seed collection from Lyngbye's sedge individuals likely to be impacted shall occur in July-September prior to construction or ground disturbance within the salt marsh.</li> </ol>			
10. Redistribution of Lyngbye's sedge seeds shall occur concurrently with Humboldt Bay owl's clover in the fall after dense-flowered cordgrass removal (if required per five and six above) and trail construction related disturbance have concluded, in the area that was impacted.			
MM BIO-2: Protect Special Status Bats	Conduct	City of	Pre-construction
The City of Eureka shall implement the following avoidance and protection measures for special status bats:	preconstructi on surveys.	Eureka	and Continual during
1. If construction occurs during the bat maternity season (generally May 1st through August 30th), a qualified bat biologist shall conduct surveys within suitable habitat for special status bats. Survey methodology shall include visual examination with binoculars from within the trail alignment of suitable habitat areas for signs of bat use and may optionally utilize ultrasonic detectors to determine if special status bat species utilize the vicinity.	Implement listed performance measures.		formance con clear con outs
<ol> <li>Surveys shall be conducted by a qualified biologist within seven days prior to construction in any areas where potential maternity roosts may be disturbed/removed. The pre-construction surveys for bats may coincide with pre-construction surveys for other animals.</li> </ol>			SEASOIT
3. Surveys shall include a visual inspection of the impact area and any large trees/snags with cavities or loose bark. If the presence of a maternity roost is confirmed, an appropriate buffer distance will be established in consultation with CDFW to ensure that construction noise will remain below disturbance thresholds for bats. If no bat utilization or roosts are found, then no further study or action is required. If bats are found to utilize the Project			

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
<ul> <li>Area, or presence is assumed, a bat specialist should be engaged to advise the best method to prevent impact.</li> <li>4. Project-related lighting shall be minimized if any construction occurs at night, either contained within structures or limited by appropriate reflectors</li> </ul>			
or shrouds and focused on areas needed for safety, security or other essential requirements.			
MM BIO-3: Protect Special Status Terrestrial Mammals	Implement	City of	Continual during
The City of Eureka shall implement the following avoidance and minimization measures for to protect special status mammals such as the North American	listed performance measures.	Eureka	construction
Porcupine:  1. Steep-sided excavations capable of trapping mammals shall be ramped or covered if left overnight.			
Project personnel are not permitted to have pets (i.e., dogs) in the Project Area during construction.			
<ol> <li>No poisons (including anticoagulant rodenticides) or other potentially injurious materials attractive to mammals shall be utilized or left unattended during construction or operation activities.</li> </ol>			
<ol> <li>Trash shall be placed in receptacles and removed from the Project Area daily at the end of the work shift to avoid being left on-site overnight.</li> </ol>			
Implementation of Mitigation Measure BIO-3 is intended to reduce potential impacts to special status terrestrial mammals such as the North American Porcupine to be less than significant.			
MM BIO-4: Protect Special Status and Migratory Nesting Birds	Conduct	City of	Pre-Construction
The City of Eureka shall implement the following measures prior to construction to ensure no significant impacts will occur to native migratory bird species:	preconstructi on surveys.	Eureka	and during construction
<ol> <li>Ground disturbance and vegetation clearing shall be conducted, if possible, during the fall and/or winter months and outside of the avian nesting season</li> </ol>	Implement listed		unless entire construction area

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
<ul> <li>(March 15 – August 15) to avoid any direct effects to special status and protected birds. If ground disturbance cannot be confined to work outside of the nesting season, a qualified ornithologist shall conduct pre-construction surveys within the vicinity of the Project Area, to check for nesting activity of native birds and to evaluate the site for presence of raptors and special status bird species. The ornithologist shall conduct at minimum a one day pre-construction survey within the 7-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance or vegetation removal work lapses for seven days or longer during the breeding season, a qualified ornithologist shall conduct a supplemental avian pre-construction survey before Project work is reinitiated. The pre-construction surveys for birds may coincide with pre-construction surveys for other animals.</li> <li>2. If active nests are detected within the construction footprint or sufficiently near construction activities (as determined in consultation with CDFW), the ornithologist shall flag a buffer around each nest (assuming property access). Construction activities shall avoid nest sites until the ornithologist determines that the young have fledged or nesting activity has ceased. If nests are documented outside of the construction (disturbance) footprint, but near enough to pose a risk to the nest (as determined in consultation with CDFW) buffers will be implemented as needed (buffer size dependent on species). Buffer sizes for common species would be determined on a case-by-case basis in consultation with the CDFW. Buffer sizes will take into account factors such as (1) noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; (2) distance and amount of vegetation or other screening between the construction site and the nest; and (3) sensitivity of individual nesting species and behaviors of the nesting birds.</li> &lt;</ul>			cleared pre- construction unless outside breeding season

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
3. If active nests are detected during the survey, a qualified ornithologist shall monitor all nests according to a monitoring schedule agreed upon in consultation with CDFW to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified ornithologist, disturb nesting activities (e.g., excessive noise), shall be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified ornithologist shall immediately implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing speed limits, replacing and updating noisy equipment, queuing trucks to distribute idling noise, locating vehicle access points and loading and shipping facilities away from noise-sensitive receptors, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise-sensitive receptors.			
<ul> <li>MM BIO-5: Protect Special Status Amphibians and Reptiles</li> <li>The City of Eureka shall implement the following measures to ensure no significant impacts will occur to amphibian and reptile species:</li> <li>1. No more than one week prior to commencement of ground disturbance (construction) within 50 feet of suitable reptile and/or amphibian habitat (e.g., McFarlan Creek Gulch, riparian areas, damp meadows), a qualified biologist shall perform a pre-construction survey for Western Pond Turtles and Northern Red-legged Frogs, and shall relocate any individuals or egg masses that occur within the work-impact zone to nearby suitable habitat.</li> </ul>	Conduct preconstructi on surveys. Implement listed performance measures.	City of Eureka	Pre-construction and during construction

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
The pre-construction surveys for amphibians and reptiles may coincide with pre-construction surveys for other animals.			
2. In the event that a Western Pond Turtle or Northern Red-legged Frog is observed in an active construction zone, the contractor shall halt construction activities in the immediate area where observed and the turtle or frog and shall be moved to a safe location in similar habitat outside of the construction zone. Turtles and frogs may be moved by anyone that has completed the tailgate Environmental Awareness Training, as described below.			
3. An Environmental Awareness Training will be provided to the construction crew prior to the commencement of construction activities. This "tailgate" training is intended to enable the construction crew to be able to identify Western Pond Turtles/Red Legged Frogs and to safely relocate them outside of the project area. In addition, the training will inform the construction crew of sensitive plant communities and wetlands.			
MM BIO-6: Avoidance and Minimization Measures for Fish  The City of Eureka shall ensure that any vibratory pile driving will adhere to a minimum setback of ten feet from any wetted aquatic habitat (open water) to avoid noise and vibration-related impacts to special status fish.	Maintain setback	City of Eureka	Continual during construction when piles are installed
<ul> <li>MM BIO-7: Compensatory Mitigation and Mitigation Monitoring Plan</li> <li>The City of Eureka shall implement the following avoidance and protection measures for upland Sensitive Natural Communities:</li> <li>1. Create and implement a Habitat Mitigation and Monitoring Plan (HMMP) that requires replanting following species: redwood forest, Pacific willow-red alder forest, and coastal willow thickets. The mitigation ratio for these species removal shall be no less than 1:1 based on aerial (square footage of impaction), to the satisfaction of permitting agencies. Monitoring</li> </ul>	Create and implement HMMP	City of Eureka	Per HMMP

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
requirements, reporting obligations, and success criteria shall also be included in the HMMP.  2. If individual trees are removed (as opposed to area impact) they shall be			
replaced at 1:1 for DBHs of 6-12 inches and 2:1 at DBHs 12-24 inches and 3:1 at DBHs greater than 24 inches.			
MM BIO-8: Avoidance and Minimization Measures for Waters of the United States and the State	Create and Implement	City of Eureka	Pre-construction and during
The City of Eureka shall implement the following avoidance and protection measures for Waters of the United States and Waters of the State:  1. The City shall attempt to avoid or minimize impacts to wetlands/waters to	Spill Prevention Plan.		construction
the greatest extent feasible in the final design plans.	Implement listed		
<ol><li>Areas where wetland and upland vegetation are to be removed shall be clearly identified in the construction documents and reviewed by the City prior to issuing for bid.</li></ol>	performance measures.		
3. Within 10 days of completion of construction in those areas where subsequent ground disturbance will not occur for 10 calendar days or more, disturbed areas shall be temporarily stabilized to reduce the potential for short-term erosion. Prior to a rain event or when there is a greater than 50 percent possibility of rain within the next 24 hours, as forecasted by the National Weather Service, appropriate BMPs will be installed upon completion of the day's activities to control erosion and prevent sediment laden stormwater from leaving the construction area.			
4. Suitable perimeter control BMPs, such as silt fences, or straw wattles shall be placed below all construction activities at the edge of surface water features to intercept sediment before it reaches the waterway. These BMPs shall be installed prior to any clearing or grading activities.			

Environmental Protection Actions (EPA) and Mitigation Measures (I	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
5. If spoil (or stockpile) sites are used, they shall be located such that not drain directly into a surface water feature, if possible. If a spoil drains into a surface water feature, swales shall be constructed to sediment before it reaches the feature. Spoil sites shall be graded vegetated to reduce the potential for erosion.	site intercept		
<ol> <li>Sediment control measures shall be in place prior to the onset of season and will be monitored and maintained in good working con until disturbed areas have been revegetated.</li> </ol>	, i		
<ol> <li>A site-specific spill prevention plan shall be implemented for poter hazardous materials near wetlands and waters. The plan shall incomproper handling and storage of all potentially hazardous materials as the proper procedures for cleaning up and reporting any spills. necessary, containment berms shall be constructed to prevent spin materials from reaching surface water features.</li> <li>Equipment and hazardous materials shall be stored 50 feet (or other contents).</li> </ol>	lude the , as well If Iled ner		
appropriate distance as needed given specific site conditions) awasurface water features.	ay from		
MM BIO-9: Compensatory Mitigation for Wetlands Impacts  The City of Eureka shall implement the following measures to ensure compensatory mitigation for impacted wetlands and waters is achieved it cannot be avoided:	they Create and implement HMMP	City of Eureka	Per HMMP
1. The City shall compensate for wetlands impacts through restoration rehabilitation, and/or creation of wetlands. The City will identify a state develop a specific plan for that property to create the necessary warmount. A HMMP shall be prepared in coordination with the USAN NCRWQCB, CCC, and CDFW. Compensation for wetlands shall ensure is no net loss of wetland habitat at ratios to be determined.	etland EE, occur to		

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
<ul> <li>consultation with the USACE, NCRWQCB, CCC, and CDFW, to be no less than 1:1.</li> <li>2. The HMMP shall be acceptable to the applicable agencies and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; monitoring schedule; and remedial measures. The Plan shall be implemented by the City.</li> </ul>			
MM CR-1: Implementation of Inadvertent Discovery Protocols  If buried archaeological resources are discovered during project implementation all work should be halted within 50 feet of the find and City officials, a professional archaeologist, and tribal representatives would be contacted immediately to evaluate the find.	Implement performance measure	City of Eureka	Continual during construction
MM CR-2: Minimize Impacts to Unknown Archaeological Resources or Human Remains if Encountered  If human remains are discovered during project implementation all work shall be halted and the permitting agency, the City of Eureka shall be contacted immediately. The City shall contact the County Coroner and tribal representatives immediately, and the Coroner would evaluate the find to determine the subsequent course of action.	Implement performance measure	City of Eureka	Continual during construction
MM GEO-1: Inadvertent Discovery of Paleontological Resources In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the	Implement performance measure	City of Eureka	Continual during construction

Environmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they would be properly curated and preserved.			
MM HAZ-1: Protection of Waters from Hazardous Materials  Equipment on site during construction will be required to have emergency spill cleanup kits immediately accessible in the case of any fuel or oil spills. Equipment will not be refueled near any perennial wetland or streams. If equipment must be washed, it will be washed off-site.	Implement performance measure	City of Eureka	Continual during construction
<ul> <li>MM HWQ-1: Implement Best Management Practices to Protect Water Quality</li> <li>The following representative Best Management Practices would be implemented to protect water quality during construction to avoid impacts to water quality: <ol> <li>All contractors that would be performing demolition, construction, grading, operations or other work that could cause increased water pollution conditions at the site (e.g., dispersal of soils) shall receive training regarding the environmental sensitivity of the site and need to minimize impacts. Contractors also shall be trained in implementation of stormwater BMPs for protection of water quality.</li> <li>The Contractor would implement BMPs during construction including the following BMPs from the current California Stormwater BMP Handbook for Construction: EC-1: Scheduling; EC-2: Preservation of Existing Vegetation; NS-2: Dewatering Operations; NS-9: Vehicle Equipment and Fueling; NS-10: Vehicle &amp; Equipment Maintenance; WM-2: Material Use; and WM-4: Spill Prevention and Control;</li> </ol> </li> </ul>	Implement listed performance measures.	City of Eureka	Pre-construction and during construction

Envir	onmental Protection Actions (EPA) and Mitigation Measures (MM)	Monitoring and Reporting Action	Responsi ble Party	Monitoring Schedule
3.	Contractors would be responsible for minimizing erosion and preventing the transport of sediment to sensitive areas;			
4.	Sufficient erosion control supplies would be maintained on site at all times, available for prompt use in areas susceptible to erosion during rain events;			
5.	Disturbance of existing vegetation would be minimized to only that necessary to complete the work;			
6.	The contractor would make adequate preparations, including training and providing equipment, to contain oil and/or other hazardous materials spills;			
7.	Dewatering operations would be conducted where needed from the work location and stored or disposed of appropriately;			
8.	Vehicle and equipment maintenance should be performed off-site whenever practical;			
9.	Contractor shall ensure that the site is prepared with BMPs prior to the onset of any storm predicted to receive 0.5 inches or more of rain over 24 hours; and			
10	All erosion and sediment control measures shall be maintained in accordance to their respective BMP fact sheet until disturbed areas are stabilized.			