EXHIBIT "A"

MITIGATION MONITORING AND REPORTING PROGRAM EUREKA FLOOD REDUCTION AND SEA LEVEL RISE RESILIENCY PROJECT

To avoid, reduce or mitigate significant effects resulting from the proposed Project, Public Resources Code Section 21081.6 requires that monitoring and reporting procedures take place through implementation of a Mitigation Monitoring and Reporting Program (MMRP). **Table A-1** provides the MMRP for the proposed Project in accordance with those guidelines.

TABLE A-1
MITIGATION MONITORING AND REPORTING PROGRAM

Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
3.3 AIR QUALITY		
AQ-1 BMPs to Reduce Air Pollution The contractor shall implement the following BMPs during construction: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered areas of active construction at a sufficient interval to avoid the migration of fugitive dust, anticipated to be two times per day or unless natural precipitation has occurred. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • 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. The use of dry power sweeping is prohibited. • 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. • All roadways, driveways, and sidewalks to be paved shall be completed in a timely manner. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. • All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. • 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	City of Eureka's Contractor	Project construction

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	Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
	NCUAQMD's phone number shall also be visible to ensure compliance with applicable regulations.		
3.4	***BIOLOGICAL RESOURCES***		
BIO-1	**Pre-construction Survey for Point Reyes bird's-beak** A seasonally appropriate pre-construction survey for Point Reyes bird's-beak shall be performed by a qualified botanist and shall occur prior to construction within the planned area of disturbance, during the appropriate blooming time (which is June through October for this species, however this species was observed blooming in May). If the pre-construction survey determines that Point Reyes bird's-beak (or a different special status plant) is present within the area of disturbance, these plants shall be avoided to the extent feasible. If avoidance is not feasible, they shall be conserved by measures appropriate for the individual species which may include methods such as plant relocation, seed collection, and/or nursery plant propagation. If plant relocation is utilized for Point Reyes bird's-beak, it shall be removed using hand tools and stored in a basin (containers) for no longer than two weeks within the Project Area where it will receive adequate sunlight and water. The plants shall be planted using hand tools as soon as possible in the vicinity of where they were removed.	City of Eureka's Biologist	Pre-construction
BIO-2	**Protect Special Status, Migratory and Nesting Birds** Ground disturbance and vegetation clearing shall be conducted, if possible, during the fall and/or winter months and outside of the avian nesting season (which is generally assumed to occur between March 15 – August 15) to avoid any direct effects to special-status	City of Eureka's Biologist	If surveys necessary: Pre-construction

TABLE A-1
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Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
and protected birds. If ground disturbance or vegetation clearing cannot be confined to the fall and/or winter outside of the nesting season, a qualified ornithologist shall conduct pre-construction surveys within the PSB and immediate vicinity, 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 seven-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance and vegetation removal work lapses for seven days or longer during the nesting season, a qualified ornithologist shall conduct a supplemental avian pre-construction survey before project work is reinitiated. If active nests are detected within the construction footprint or immediately adjacent to construction activities within the Project Area, the ornithologist shall flag a buffer around each nest. Construction activities shall avoid nest sites until the ornithologist determines that the young have fledged or nesting activity has ceased. In general, the buffer size for common species would be determined on a case-by-case basis in consultation with the CDFW and, if applicable, with USFWS. Buffer sizes would 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.		

TABLE A-1
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Monitoring Measure		Individual Responsible for Implementing	Timing of Initial Action
BIO-3	**Protect Special Status Amphibians** No more than one week prior to commencement of ground disturbance within 50 feet of suitable amphibian habitat, a qualified biologist shall perform a pre-construction survey for Northern Red-legged Frogs and shall relocate any individuals or egg masses that occur within the work-impact zone to nearby suitable habitat. In the event that a 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 frog(s) shall be moved to a safe location in similar habitat outside of the construction zone.	City of Eureka's Biologist	Pre-construction
BIO-4	**Protection of Special Status Aquatic Species and Aquatic Habitat** To minimize impacts to special status fish and lamprey species, the following avoidance and minimization measures are proposed: • Silt fences and other erosion control measures shall be deployed along construction areas adjacent to Humboldt Bay, wetlands, and waters to prevent sediment input into these resources. If the silt fences are not adequately containing sediment, construction activity shall cease until remedial measures are implemented that prevent sediment from entering the waters below the construction area. • Construction materials, debris, or dredge material, shall not be placed or stored where it could enter into aquatic resources. • Fueling and equipment maintenance shall occur at least 100 feet away from wetlands and waterways.	City of Eureka's Contractor and Biologist	Project construction

TABLE A-1
MITIGATION MONITORING AND REPORTING PROGRAM

	Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
	• Prior to the start of construction activities, and if water is present within the Project construction limits, surveys for fish or lamprey species shall be conducted by a qualified biologist in pooled or moving water within the work area. If no water is present, no further actions related to surveys for species and relocation are required. • If standing water and fish or lamprey species are identified, the fish or lamprey would be relocated to suitable habitat by a qualified fisheries biologist using seining and trapping procedures and an aerated bucket. It is assumed that no ESA- or CESA-listed species would be relocated. Non special status species would be relocated as feasible. • Prior to the start of construction activities, a qualified biologist shall provide on-site worker environmental awareness training (tailboard) for crews at the commencement of construction. The training would include identification and life history of sensitive species, applicable regulations, species and habitat protection measures, fines and penalties, and procedures to be followed if sensitive species are observed on-site.		
BIO-5	**Mitigate for Impacts to Aquatic Resources** Aquatic resources that are permanently filled shall be mitigated for at least at a 1:1 ratio. Mitigation may also include other restoration components, such as removal of invasive vegetation, per discussions with the Coastal Commission. Mitigation shall occur within the Project Area if feasible, or on suitable City-owned property outside of the Project Area. Mitigation for impacts to aquatic resources shall be achieved at a ratio to be	City of Eureka	Post construction

TABLE A-1
MITIGATION MONITORING AND REPORTING PROGRAM

	Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
	determined in conjunction with regulatory agencies, but not less than 1:1. Aquatic resources that are temporarily impacted shall be restored to pre-Project conditions, which may include planting of CA native vegetation where vegetation was removed.		
3.5	***CULTURAL RESOURCES***		
CR-1	**Minimize Impacts to Archaeological Remains if Encountered** Archaeological monitors shall be present during construction within the Railroad St and Staging Area, Commercial St, Washington St, Koster St, and Short St Region APEs. The archaeological monitor shall meet the Secretary of Interior's Professional Qualifications Standards for Archaeology (Title 36 Code of Federal Regulations Part 61, and 48 Federal Regulation 44716). Prior to project implementation a monitoring plan should be drafted and reviewed by the THPOs of the Bear River Band of Rohnerville Rancheria, the Blue Lake Rancheria, and the Wiyot Tribe. The monitoring plan shall include the stipulation that if archaeological materials associated with a Wiyot ancestral site are identified during monitoring, then the THPOs from the three Wiyot groups shall be immediately notified and allowed to provide a Tribal Cultural Monitor, if they so choose. The monitoring plan shall include the historic-era archaeological site documented in the Railroad St and Staging Area Region APE as well.	City of Eureka's Archaeological Monitor in Coordination with the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria and Wiyot Tribe THPOs	Pre-construction and during construction
CR-2	**Implement Worker Sensitivity Training and Inadvertent Discovery Protocols**	City of Eureka's Archaeological Monitor	Project construction

TABLE A-1
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	Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
	If archaeological resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist shall be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with native American heritage (prehistoric sites and select historic period sites), the Tribal Historic Preservation Officers for the Bear River Band of Rohnerville Rancheria, Blue Lake Rancheria, and Wiyot Tribe are to be contacted immediately to evaluate the discovery and, in consultation with the project proponent, City of Eureka, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Prehistoric materials may include obsidian or chert flakes, tools, locally darkened midden soils, groundstone artifacts, shellfish or faunal remains, and human burials. Historic archaeological discoveries may include 19th century building foundations; structural remains; or concentrations of artifacts made of glass, ceramic, metal or other materials found in buried pits, old wells or privies.		
CR-3	**Minimize Impacts to Human Remains if Encountered** In the event of discovery or recognition of any human remains during construction activities, the landowner or person responsible for excavation would be required to comply with the State Health and Safety Code 7050.5. Construction activities within 100 feet of the find shall cease until the Humboldt County Coroner has been contacted to determine that no investigation of the cause of death is required. If the remains are determined to be, or potentially be, Native American, the landowner or person responsible for excavation would be	City of Eureka's Contractor	Project construction

TABLE A-1
MITIGATION MONITORING AND REPORTING PROGRAM

	Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
	required to comply with Public Resources Code Section 5097.8. In part, PRC Section 5097.98 requires that the Native American Heritage Commission (NAHC) shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC would then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the landowner or the person responsible for the excavation work for the appropriate means of treating the human remains and any associated grave goods within 48 hours of being granted access to the site. Additional provisions of Public Resources Code Section 5097.98 shall be complied with as may be required.		
3.7	***GEOLOGY AND SOILS***	City of Eureka's Contractor	Project construction
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 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 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.		

TABLE A-1
MITIGATION MONITORING AND REPORTING PROGRAM

Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
3.9 HAZARDS AND HAZARDOUS MATERIALS **HAZ-1 Prepare Soil Plan, Implement Phase II ESA Recommendations** The City shall complete the following requirements to appropriately stockpile, handle, test, and dispose of contaminated soil and groundwater within 200 feet of the Environmental Sample Locations as shown on Figure 3 of the Phase II ESA prior to Project construction: • A Soil Excavation, Stockpiling and Transportation Plan (SESTP) shall be prepared prior to waste stream generation. The SESTP shall specify measures to properly handle, store, transport, and dispose of contaminated soil and groundwater. • The SESTP shall address soil and groundwater, stockpiling/storage, waste characterization, and disposal. The SESTP will specify measures to appropriately manage soil and groundwater spills during Project construction, worker protection, fugitive dust/emissions control, and waste characterization. • The SESTP shall also address worker health and safety during Project construction, including the specific level of protection required for construction workers. This shall include preparation of a site-specific health and safety plan for Project construction prepared in accordance with Cal/OSHA regulations (8CCR5192). • Soil spoils generated by the Project construction shall be placed on a non-porous disposable groundcover (polyethylene sheeting or similar) and covered. Groundwater shall be containerized in drums, poly tanks or Baker tanks. • Waste streams shall be appropriately containerized and characterized prior to transport off-site. An appropriately licensed	City of Eureka, and City's Contractor	Pre-construction and during construction

TABLE A-1
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	Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
	waste transporter shall be utilized to haul waste to the disposal facility permitted to accept the type of waste generated.		
HAZ-2	**Characterize Existing Suspect Asbestos Building Materials within Project Area** The City shall complete the following requirements to appropriately characterize suspect Asbestos Containing Materials (ACM) within the Project Area prior to Project construction: • Where Project construction design proposes to include demolition or deconstruction of existing structures (including roadways), pre-construction sampling of suspect ACM shall be conducted associated with such structures in accordance with USEPA National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations. • Where ACM is identified on or within structures that may be impacted by Project construction, such material shall be appropriately removed by a certified abatement contractor prior to other construction work impacting the structure(s) where the ACM occurs. Asbestos waste generated during abatement shall be packaged in leak-tight containers and transported by a licensed waste hauler to a disposal facility licensed to accept such waste.	City of Eureka	Pre-construction
	Existing Regulations/Standard BMPs:		
	Environmental Protection Action 1 – Stormwater Pollution Prevention Plan The Project would seek coverage under State Water Resources Control Board (Regional Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff	City of Eureka's Contractor	Project construction

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Monitoring Measure	Individual Responsible for Implementing	Timing of Initial Action
Associated with Construction and Land Disturbance Activities. The City would submit Construction General Permit registration documents (notice of intent, risk assessment, site maps, Storm Water Pollution Prevention Plan (SWPPP), annual fee, and certifications) to the Water Board. The SWPPP would address pollutant sources, best management practices, and other requirements specified in the Order. The SWPPP would include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Developer would oversee the development of the SWPPP and a Qualified SWPPP Practitioner would oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.		
Environmental Protection Action 2 – Implementation of Geotechnical Design Recommendations The Project would be designed and constructed in compliance with the site-specific recommendations made in the Geotechnical Investigation Report for Stormwater Improvements (SHN 2022a). This would include design in accordance with recommendations for excavations, dewatering and uplift pressures, active dewatering system, passive dewatering system, excavation backfill, utility trench backfill, support of below-grade structures, retaining wall, and all other recommendations in the report. The geotechnical recommendations would be incorporated into the final plans and specifications for the Project and would be implemented during construction.	City of Eureka	Pre-construction and during construction