

SUBSTANTIAL CONFORMANCE REVIEW CHECKLIST**MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM**

Purpose: This Substantial Conformance Review (SCR) Checklist is intended to be used by Development Services Department Staff as an aid in reviewing storm water system maintenance projects for consistency with the Site Development Permit (SDP) based on conformance with the Mitigation, Monitoring and Reporting Program (MMRP); the Maintenance Protocols contained in the Master Program; and the SDP Conditions.

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ACTIVITY INFORMATION

Master Program Map #(s): 134
City Equipment #(s): 88000180
Creek Name: Nestor Creek Channel
Watershed(s): Otay
Location: 1760 Palm Avenue

DOCUMENTS INCLUDED IN CONSISTENCY DETERMINATION PACKAGE

Included	NA	Document
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Individual Maintenance Plan (IMP)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Individual Biological Assessment (IBA)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Individual Historical Assessment (IHA)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Individual Hydrologic and Hydraulic Assessment (IHHA)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Individual Water Quality Assessment (IWQA)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Individual Noise Assessment (INA)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Maintenance Methodology Table (MMT)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Maintenance Activity Report (MAR)

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program PEIR Mitigation, Monitoring, and Reporting Program			
General Mitigation			
1	Have mitigation measures for impacts to biological resources, historical resources, land use, and paleontological resources, as appropriate, been included in entirety on the submitted maintenance documents and contract specifications, under the heading, "Environmental Mitigation Requirements"? (General Mitigation Measure 1)	Y	<p>Mitigation is required to compensate for permanent impacts to biological resources, namely wetlands. Compensation for the loss of wetland habitat will be implemented.</p> <p>No noise-sensitive wildlife occurred in or adjacent to the maintenance area, and a nesting bird survey confirmed the absence of nesting birds. Due to past disturbance within the maintenance area, no historical resources are anticipated. The removal of accumulated sediment would not encroach into geologic formations containing paleontological material. Thus, no mitigation was required for noise, historical or paleontological resources.</p> <p>No land use impacts occurred which required mitigation.</p>
2	Is a Pre-maintenance Meeting required, including, as appropriate, the Mitigation Monitoring Coordinator (MMC), Storm Water Division (SWD) Project Manager, Biological Monitor, Historical Monitor, Paleontological Monitor, and Maintenance Contractor (MC), and other parties of interest? (General Mitigation Measure 2)	Y	An on-site pre-maintenance meeting prior to commencing maintenance activities was conducted. Included were a SWD maintenance manager, a maintenance contractor, and a monitoring biologist.
3	Is there documented evidence of compliance with other permitting authorities (e.g., copies of permits issued, letters of resolution issued by the Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the Assistant Deputy Director [ADD] Environmental Designee), as applicable? (General Mitigation Measure 3)	Y	<p>The maintenance work was completed under the emergency provisions of the U.S. Army Corps of Engineers (USACE), San Diego Regional Water Quality Control Board (SDRWQCB), California Department of Fish and Wildlife (CDFW), and City of San Diego.</p> <p>Approvals from the USACE and SDRWQCB were received under the provisions of Regional General Permit (RGP) 63. The USACE authorized the work under RGP 63 on January 25, 2016 and the RWQCB enrolled the work on January 9, 2016. An emergency Site Development Permit (SDP) and Coastal Development Permit (CDP) were approved by the City of San Diego's Development Services Department (DSD) on January 25, 2016. A Notification of Emergency Work, as required under the Lake or Streambed Alteration (LSA) Program, was submitted on February 9, 2019 within the 14-day notification period following completion of the maintenance.</p> <p>Copies of these documents are included in Appendix A.</p>
4	Is there documented evidence of compliance with Section 1602 of the State of California Fish & Game Code (e.g., copies of permits issued, letters of resolution issued by the	Y	As indicated above, an emergency notification was filed with the CDFW.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
	Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee), as applicable? (General Mitigation Measure 4)		

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Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources			
5	Has a qualified biologist prepared an IBA for each area proposed to be maintained in accordance with the specifications included in the Master Program? (Mitigation Measure 4.3.1)	NA	As an emergency project, insufficient time existed to prepare a formal IBA. However, a field survey was completed prior to maintenance to document the biological resources present in the channel and allow a determination of the amount of wetland vegetation impacted by the proposed maintenance. A copy of the vegetation map is included in Appendix B. In addition, a biological memo was prepared and is included in Appendix B as well.
6	Have the IMPs and IBAs for maintenance activities within a proposed annual maintenance program been approved by the City's ADD Environmental Designee and state and federal agencies with jurisdiction over maintenance activities? (Mitigation Measure 4.3.2)	NA	As an emergency maintenance project, insufficient time existed to allow preparation of a formal IMP and IBA, in accordance with the MMP for prior approval of the Resource Agencies and DSD.
7	Has an IBA been prepared by a qualified biologist for each proposed maintenance activity, including the required contents? (Mitigation Measure 4.3.3)	NA	As indicated in response to No. 5, an IBA was not prepared.
8	Has a mitigation account been established to provide sufficient funds to implement all biological mitigation associated with the proposed maintenance act? (Mitigation Measure 4.3.4)	Y	The mitigation associated with this project will be funded by the Transportation & Storm Water Department's (T&SWD's) annual budget.
9	Has evidence been provided documenting approval of the proposed maintenance by permitting authorities? (Mitigation Measure 4.3.5)	Y	As indicated in response to No. 3, appropriate approvals were obtained.
10	Does the IMP call for a pre-maintenance meeting, if identified in the associated IBA? (Mitigation Measure 4.3.6)	NA	As indicated in response to No. 2, a pre-maintenance meeting took place.
11	Does the IBA for each proposed maintenance activity identify appropriate wetland mitigation measures according to the ratios identified in Table 4.3-10? (Mitigation Measure 4.3.9)	NA	As indicated in response to No. 5, an IBA was not prepared. However, mitigation ratio for impact of 0.02 acres of freshwater marsh will be applied based on the determination of whether the impacts are permanent (4:1) or temporary (1:1), as summarized under Condition 1.7.1 of the MMP SDP/CDP Settlement Agreement
12	Have wetland mitigation plans and enhancement and/or restoration plans been prepared and submitted to the DSD pursuant to the requirements described in Mitigation Measure 4.3.10? Are they consistent with Appendix H of the Biological Technical Report (BTR) contained in Appendix D.3 of the PEIR? (Mitigation Measure 4.3.10)	Y	The City has not submitted plans to DSD, however, plans are currently being prepared to mitigate impacts associated with all the emergency maintenance that occurred under RGP 63.
13	Would upland impacts be compensated through payment into the City's Habitat Acquisition Fund, or through acquisition and/or preservation of land in accordance with the ratios and requirements identified in Table 4.3-11? (Mitigation Measure 4.3.11)	NA	No sensitive upland vegetation was impacted. Therefore, no compensation was required. (See Appendix B).
14	If the maintenance activity would result in loss of habitat for the coastal California gnatcatcher, is mitigation planned (i.e., through the acquisition of suitable habitat or mitigation credits) within the Multi-Habitat Planning Area (MHPA) at a ratio of 1:1, to be accomplished	NA	No coastal California gnatcatcher (CAGN) habitat (i.e., Coastal Sage Scrub) occurred within the maintenance area or immediate vicinity (See Appendix B). Thus, no mitigation was required.

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	within six months of the date of maintenance completion? (Mitigation Measure 4.3.12)		
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Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources (cont.)			
15	<p>If sensitive biological resources may be impacted, would the monitoring biologist be able to verify that the following actions have been taken:</p> <ul style="list-style-type: none"> • Has fencing, flagging, signage, or other means to protect sensitive resources been implemented? • Are noise attenuation measures needed to protect sensitive wildlife in place and effective? • Have nesting raptors been identified and necessary maintenance setbacks have been established if maintenance is to occur between February 1 and August 1? <p>(Mitigation Measure 4.3.13)</p>	Y	<p>All emergency maintenance work was monitored by a qualified biologist. A nesting bird and raptor survey was conducted before the start of maintenance activities (see Appendix B). No nesting birds or nesting raptors were documented during the February 4, 2016 survey. All work was completed before March 14 in order to avoid the light-footed Ridgway's rail nesting season. Therefore, noise attenuation was not required. No vegetation within the channel could be retained due to the narrow dimension of the channel. No fencing was required due to the absence of adjacent sensitive biological resources that needed protection.</p>
16	<p>Have off-site mitigation areas been reviewed to determine if the mitigation would have a significant impact on biological resources located within the disturbance area of the mitigation? If so, have appropriate mitigation measures been proposed to reduce these impacts to below a level of significance?</p> <p>(Mitigation Measure 4.3.14)</p>	Y	<p>Potential biological impacts associated with offsite mitigation areas for emergency maintenance projects will be considered as a part of the process of developing the mitigation plan.</p>
17	<p>Does the IBA discuss appropriate actions to offset impacts to listed or endemic sensitive plant species? (Mitigation Measure 4.3.15)</p>	NA	<p>No endemic sensitive plants species were impacted by maintenance (See Appendix B).</p>
18	<p>Would maintenance activities meet setback requirements for sensitive species? (Mitigation Measure 4.3.16)</p>	NA	<p>As indicated in response to No. 15, no sensitive wildlife are present in the area which would require setbacks.</p>
19	<p>Would clearing, grubbing, or grading (inside and outside the MHPA) be restricted during the breeding season of the listed species? Have protocol surveys been conducted for other potentially occurring sensitive species? If observed, have adequate mitigation measures been identified in the IBA? (Mitigation Measure 4.3.17)</p>	Y	<p>As indicated in response to No. 15, nesting bird surveys were conducted before maintenance.</p>
20	<p>Has evidence been submitted to document that protocol surveys have been conducted for potentially occurring sensitive bird species? (Mitigation Measure 4.3.18)</p>	Y	<p>The nesting bird survey is included in Appendix B.</p>
21	<p>Has the IBA included appropriate mitigation measures when the potential exists for a sensitive bird species to occur near a proposed maintenance area and no protocol surveys have been conducted? (Mitigation Measures 4.3.19, 20 and 21)</p>	NA	<p>No mitigation measures were required to protect sensitive bird species because none were observed during the nesting bird and raptor survey.</p>
22	<p>Would removal of any eucalyptus trees or other trees used by raptors for nesting be proposed within the maintenance area? If yes, would maintenance include appropriate setbacks and limitations? (Mitigation Measure 4.3.22)</p>	N	<p>The project did not result in the removal of any eucalyptus or other trees in the maintenance area that could be used by raptors. Furthermore, as discussed in response to No. 15, a nesting bird survey was conducted prior to maintenance.</p>
23	<p>Would maintenance activities occur at known localities for listed fish species? If yes, would maintenance include appropriate mitigation? (Mitigation Measure 4.3.23)</p>	N	<p>There were no known listed fish species occurring within the project area.</p>

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24	Would maintenance activities occur within areas supporting listed and/or narrow endemic plants? If yes, would maintenance proceed as described in Mitigation Measure 4.3.24?	N	Listed/narrow endemic plants were not present in segments proposed for maintenance.
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources (cont.)			
25	If maintenance is proposed during the nesting season of avian species, including those species not covered by the Multiple Species Conservation Program (MSCP), does the IBA require maintenance within or adjacent to avian nesting habitat occur outside of the avian breeding season (January 15 to August 31) unless postponing maintenance would result in a threat to human life or property? (Mitigation Measure 4.3.25)	NA	As indicated in response to No. 15, no sensitive birds are present in the area which would require setbacks or noise attenuation.
Historical Resources			
26	Has a qualified archaeologist determined the potential for significant historical resources to occur in the maintenance area and prepared an IHA? (Mitigation Measure 4.4.1)	Y	The potential of encountering significant historical or cultural resources within the maintenance area is low. A record search of the area within one half-mile radius was conducted at the South Coastal Information Center in September 2015. The results of this search indicated that there were seven archaeological sites recorded within one half-mile of the maintenance channel, one of which is approximately 160 feet to the north. This site (P-37-033560) is a sparse lithic scatter of fifteen flakes and is not significant. As indicated by the site record and by HELIX biology survey photographs, the site and the surrounding area, including the maintenance channel, have been disturbed by previous grading and utility installation activities (i.e. trenching, vegetation grubbing, and riprap placement). Cultural resources surveys of the Nestor Creek channels, including the concrete-lined segment east of the maintenance area, were conducted in September and October of 2015 by HELIX archaeologists and Kumeyaay Native American monitors from Red Tail Monitoring and Research; no cultural or historical resources were identified in any of the channels. Thus, no cultural or historical resources are anticipated within the maintenance channel and mitigation is not required.
27	Has an IHA been prepared for the proposed maintenance? (Mitigation Measure 4.4.1)	N	Cultural and historical resources were analyzed as described above under response to No. 26.
28	If required, has a field survey of the maintenance activity Area of Potential Effect (APE) been performed by a qualified archaeologist and a Native American monitor? (Mitigation Measure 4.4.1)	NA	As described above under response to No. 26, no cultural or historical resources are anticipated within the maintenance channel.
29	Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1)	Y	A record search of the area within one half-mile radius was conducted at the South Coastal Information Center in September 2015. The results of

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
			this search indicate that there are seven archaeological sites recorded within one half-mile of the maintenance channel, one of which is approximately 160 feet to the north. This site (P-37-033560) is a sparse lithic scatter of fifteen flakes and is not significant.
30	Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1)	NA	In the absence of potential impacts to historical resources, no testing is required.
31	Have significant historical resources been identified within the proposed maintenance activity APE? If yes, address criteria numbers 32 through 38. If no, proceed to criteria number 39 (Mitigation Measures 4.4.1 and 4.4.2)	N	As indicated under response to No.26, no significant cultural or historical resources are anticipated within the maintenance channel.
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Historical Resources (cont.)			
32	Has a Principal Investigator (PI) been selected and approved by the SWD and ADD Environmental Designee? (Mitigation Measure 4.4.2.1)	NA	In the absence of a requirement for mitigation, a PI would be not required.
33	Have mitigation recommendations from the IHA been incorporated into the IMP to the satisfaction of the Principal Investigator (PI) and the ADD Environmental Designee? (Mitigation Measure 4.4.2.2)	NA	As indicated under response to No. 26, no mitigation would be required.
34	If impacts to significant historical resources cannot be avoided, has the PI prepared and implemented an Archaeological Research Design and Data Recovery Program (ARDDRP) for the affected resources, with input from a Native American consultant (approved by the ADD Environmental Designee? (Mitigation Measure 4.4.2.3)	NA	As indicated under response to No. 26, no significant impacts occurred as a result of the maintenance.
35	Has a pre-maintenance meeting been planned and/or conducted on site, including representatives from the PI, Native American consultant, SWD, MMC, Resident Engineer (RE), and MC? (Mitigation Measure 4.4.2.4)	NA	In the absence of a requirement for mitigation, a pre-maintenance meeting including representatives from the PI or Native American consultant was not required.
36	If human remains have been discovered in the course of conducting the ARDDRP, would the procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) be implemented? (Mitigation Measure 4.4.2.5)	NA	No human remains were encountered during the maintenance operation.
37	Will the PI and Archaeologist assume required responsibilities? (Mitigation Measures 4.4.2.6, 4.4.2.7, and 4.4.2.8)	NA	In the absence of a requirement for mitigation, a PI or Archaeologist was not required.
38	If the IHA identifies a moderate to high potential for the occurrence of significant historical resources within the APE, would mitigation measures be implemented? (Mitigation Measure 4.4.3)	NA	As indicated under response to No.26, no historical resources occurred within the maintenance and no mitigation was required.
Land Use			
39	Has the ADD Environmental Designee verified that all MHPA boundaries and limits of work have been	NA	The maintenance project area is not located within or adjacent to the MHPA. Therefore, no MHPA

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
	delineated on all maintenance documents? (Mitigation Measure 4.1.1)		boundaries were required to be delineated on any maintenance documents.
40	Has a qualified biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) recovery permit) surveyed habitat areas inside and outside the MHPA suspected to serve as habitat for the coastal California gnatcatcher, least Bell's vireo and/or other listed species? (Mitigation Measure 4.1.2)	Y	As indicated in response to No. 15, a nesting bird survey conducted prior to maintenance determined that sensitive bird species were not present within 300 feet of the proposed maintenance area.
41	Has a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) performed a noise analysis for the proposed maintenance activity? (Mitigation Measure 4.1.3)	NA	No noise analysis was required as no sensitive species were observed or detected within or adjacent to the maintenance area. (See Appendix B)
42	Would the proposed maintenance have the potential to impact breeding activities of listed species? If yes, would maintenance activities be restricted to outside the breeding season? (Mitigation Measure 4.1.4)	N	As indicated in response to No. 25, the maintenance would not impact breeding birds.
43	If maintenance cannot be avoided during an identified breeding season for a listed bird which is determined to be potentially significantly affected by maintenance, would the appropriate measures be taken? (Mitigation Measure 4.1.5)	NA	As indicated in response to No. 25, the maintenance would not impact breeding birds.
44	Has a pre-maintenance meeting been planned and/or conducted, including the MC, Project Biologist, and City representative? (Mitigation Measure 4.1.6)	Y	As indicated in response to No. 2, a pre-maintenance meeting took place.
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Land Use (cont.)			
45	Does the IMP include appropriate maintenance designs? (Mitigation Measure 4.1.7)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. However, a bypass pump system was utilized during maintenance activities in order to divert water around the maintenance activities. The pump and hose were installed upstream near a natural berm located where the concrete-lined channel met the raised earthen section of the channel. Water from the concrete channel upstream was diverted downstream of the work limits. The pump and hose were removed upon completion.
46	Has the ADD Environmental Designee verified that the MHPA boundaries and the requirements regarding coastal California gnatcatcher been included in the IMP and/or IBA? (Mitigation Measure 4.1.8)	NA	The maintenance project area is not located within or adjacent to the MHPA. Therefore, no MHPA boundaries were required to be delineated on any maintenance documents.
Master Program Protocols			
Water Quality			
47	Does the IMP include measures to stabilize designated access roads (or other graded areas) with permeable protective surfacing (e.g., grasscrete), storm water diversion structures (e.g., brow ditches or berms), or crossing structures (e.g., culverts) to control erosion and prevent off-site sediment transport? (WQ-1)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. However, access to the maintenance area occurred over paved driveways and parking areas. Thus, no stabilization measures were required.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
48	Does the IMP include measures to prevent off-site sediment transport during maintenance through the use of erosion and sediment controls within storm water facilities, along access routes and around stockpile/staging areas? Will temporary erosion or sediment control measures be removed upon completion of maintenance unless their removal would result in greater environmental impact than leaving them in place? (WQ-2)	NA	As indicated in response to No. 45, a bypass pump system was utilized during maintenance activities in order to divert water around the maintenance activities.
49	Does the IMP require storage of Best Management Practice (BMP) materials on-site in a way that provides complete protection of exposed areas and prevent off-site sediment transport? (WQ-3)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. However, no BMP materials were stored during the maintenance.
50	Does the IMP require training for personnel responsible for the proper installation, inspection, and maintenance of on-site BMPs. (WQ-4)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. However, the City crews conducting the maintenance were trained in the proper implementation of BMPs.
51	Does the IMP require revegetation of spoil and staging areas within 30 days of completion of maintenance activities? Does it require monitoring and maintenance of revegetated areas for a period of not less than 25 months following planting? (WQ-5)	NA	As no temporary disturbance occurred related to access and staging areas, no revegetation was required. As the purpose of removing vegetation in the channel was to enhance the capacity of the facility to convey storm water, revegetation of the channel was not conducted.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program Protocols (cont.)			
Water Quality (cont.)			
52	Does the IMP require sampling and analysis; monitoring and reporting; and post-maintenance management programs per National Pollutant Discharge Elimination System (NPDES) and/or City requirements? (WQ-6)	NA	The project is not subject to NPDES requirements because the NPDES General Construction Permit excludes projects that consist of “routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility” activities.
53	Does the IMP prohibit storing hazardous materials used during maintenance within 50 feet from storm water facilities? Does it require hazardous materials to be managed and stored in accordance with applicable local, state and federal regulations? (WQ-7)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. However, appropriate materials were kept on site to contain potential spills, and no spills occurred. Fueling, vehicle maintenance, and storage were located outside of the channel. All construction materials and debris were removed following completion of the emergency maintenance.
54	Does the IMP prohibit storage of maintenance-related trash in areas within 50 feet from storm water facilities, and require removal of trash in receptacles at least weekly? (WQ-8)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. However, no storage of maintenance-related trash occurred during maintenance activities. All trash was transported for legal disposal.
55	Does the IMP require installation of any check dam or other comparable mechanism identified in the corresponding IHHA? Are these structures required to be removed when vegetation growth has reached a point where the structure is no longer required unless removal would result in greater environmental harm than leaving them in place? (WQ-9)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. However, no check dam or other mechanism was installed or needed during the emergency maintenance. A bypass pump system was utilized next to a natural berm to divert water during maintenance.
56	Does the IMP require inspection of earthen-bottom storm water facilities within 30 days of the first 2-year storm following maintenance? Are erosion control measures recommended by the field engineer incorporated into the IMP? (WQ-10)	NA	Due to the emergency nature of the maintenance activities, no IMP was prepared. An inspection of the 65 LF earthen rip-rap channel segment will be performed within 30 days of the first 2-year storm event.
57	Does the IMP incorporate mitigation measures identified in the IWQA and/or Table 4.8-8 of the PEIR?	NA	Due to the emergency nature of the maintenance activities, no IMP or IWQA were prepared. However, as noted in response to No. 45, the maintenance did include a bypass pump system during maintenance activities in order to divert water around the maintenance activities.
Biological Resource Protection			
58	Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1)	NA	Access was limited to areas designated access identified in the Master Program.
59	Does the IMP require delineation and flagging of all sensitive biological resources to remain within or adjacent to the maintenance area? (BIO-2)	Y	As discussed in response to No. 15, delineation of sensitive biological resources was not required.
60	Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3)	Y	As indicated in response to No. 2, a pre-maintenance meeting took place.
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	As noted in response to No. 45, the maintenance did include a bypass pump system during maintenance activities in order to divert water around the maintenance activities.

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62	Does the IMP require conducting pre-maintenance protocol surveys if maintenance is proposed during the breeding season of a sensitive animal species? (BIO-5)	NA	As indicated in response to No. 25, a nesting bird survey was conducted.
63	If Arundo will be removed during maintenance, does the IMP include appropriate removal methods to minimize downstream dispersal? (BIO-6)	NA	No Arundo was removed during maintenance. Thus, no specific controls were required.
Master Program Protocols (cont.)			
Biological Resource Protection (cont.)			
64	Does the IMP prohibit the use of mechanized maintenance within 300 feet of a Cooper's hawk nest, 900 feet of a northern harrier's nest, or 500 feet of any other raptor's nest until any fledglings have left the nest? (BIO-7)	NA	As indicated in response to No. 25, a nesting bird survey was conducted and concluded that no nesting birds occurred within 300 feet of the proposed maintenance.
65	Does the IMP include measures to minimize the potential for entrapping wildlife when implementing erosion control measures? (BIO-8).	NA	No erosion control measures were associated with the maintenance that would have posed a substantial risk of entrapping wildlife.
Historical Resource Protection			
66	Does the IMP call for flagging, capping, or fencing of all historical resource areas in the field prior to initiation of maintenance activities in the presence of a qualified historical resource specialist, as necessary? (HIST-1)	NA	No flagging, capping or fencing of historical resources was required because, as described under No. 26, the maintenance occurred in a channel which did not support significant historical resources.
67	Does the IMP require a pre-maintenance meeting on-site when maintenance activities are determined in the IHA to potentially impact historic resources? (HIST-2)	NA	As described under response to No. 26, it was determined that no significant historical resources were anticipated to occur within the concrete-lined channel.
Waste Management			
68	Does the IMP call for disposal of compostable green waste material at an approved composting facility, if available? (WM-1)	NA	No material suitable for composting was removed during maintenance.
69	Does the IMP call for screening of soil, sand, and silt to remove waste debris and, wherever possible, to be re-used as fill material, aggregate, or other raw material? (WM-2)	NA	No material suitable for reuse was removed during maintenance.
70	Does the IMP call for separation and transport of waste tires to an appropriate disposal facility, including the completion of a Comprehensive Trip Log (CTL) if more than nine tires are in a vehicle or waste bin at any one time? (WM-3)	NA	No tires were removed during maintenance.
71	Does the IMP require hazardous materials encountered during maintenance to be logged under a hazardous materials manifest and transported to an approved hazardous waste storage, recycling, treatment or disposal facility? (WM-4)	NA	No hazardous materials were encountered during maintenance.