

**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 modified 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 modified SDP Conditions.

**Date:** March 17, 2016

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**ACTIVITY INFORMATION**

**Master Program**

**Map #(s):** 84

**City Equipment #(s):** 88000312

**Creek Name:** Unnamed tributary to San Diego Bay

**Watershed(s):** Tecolote Creek Hydrologic Unit (Basin Number 6.50)  
Directly east of Interstate-5, north of West Washington St., south of  
Keating St., and southwest of West University Ave. in San Diego,

**Location:** CA

**DOCUMENTS INCLUDED IN CONSISTENCY DETERMINATION PACKAGE****Included NA Document**

- |                                     |                                     |   |
|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Individual Maintenance Plan (IMP)                     |
| <input checked="" type="checkbox"/> | <input 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)                     |

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
<b>Master Program PEIR Mitigation, Monitoring, and Reporting Program</b>			
<b>General Mitigation</b>			
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)	N/A	An IMP was not prepared for the emergency maintenance. See Attachment E – IBA and SCR memo for details about all mitigation measures and BMPs utilized.
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	Due to the emergency nature of the work, the pre-maintenance meeting was conducted on site on the first day of emergency maintenance (1/20/2016) and included biologist and field crews.

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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>For this project, the following permits and other approvals have been issued:</p> <ul style="list-style-type: none"> <li>• Modified Master Maintenance Program (MMP)</li> <li>• Master Maintenance Program Environmental Impact Report (PEIR)</li> </ul> <p>See Also: Attachment G - Regulatory Permits, which includes the following:</p> <ul style="list-style-type: none"> <li>• Developmental Services Department (DSD) Notice of Exemption (NOE); Emergency Project (Section 21080(b)(4); 15269(b) &amp;(c)</li> <li>• Regional Water Quality Control Board 401 Water Quality Certification Enrollment</li> <li>• Army Corps of Engineers (ACOE) Regional General Permit 63 Emergency; SPL-2016-00012-RAG</li> <li>• California Dept. of Fish and Wildlife (CDFW) Lake or Streambed Alteration Agreement (1600); Notification of Emergency Work</li> </ul>
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 Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee), as applicable? (General Mitigation Measure 4)	Y	<p>See Attachment G - Regulatory Permits, which includes (among other permits):</p> <ul style="list-style-type: none"> <li>• California Dept. of Fish and Wildlife (CDFW) Lake or Streambed Alteration Agreement (1600); Notification of Emergency Work</li> </ul>
<b>Biological Resources</b>			
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)	Y	Scott Gressard is a qualified biologist, and he prepared Attachment E – IBA, which covers each area proposed to be maintained in accordance with the specifications in the Master Program.

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6	Have the IMPs and IBAs for maintenance activities within a proposed annual maintenance program been approved by the City's Assistant Deputy Director (ADD) Environmental Designee and state and federal agencies with jurisdiction over maintenance activities? (Mitigation Measure 4.3.2)	Y	See Attachment E – IBA and SCR Memo.
7	Has an IBA been prepared by a qualified biologist for each proposed maintenance activity, including the required contents? (Mitigation Measure 4.3.3)	Y	See Appendix E – IBA
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)	N/A	See Attachment E – IBA. Ongoing mitigation efforts will be funded by Transportation & Storm Water Department.
9	Has evidence been provided documenting approval of the proposed maintenance by permitting authorities? (Mitigation Measure 4.3.5)	Y	See Attachment G - Regulatory Permits, which includes the following: <ul style="list-style-type: none"> <li>• Developmental Services Department (DSD) Notice of Exemption (NOE); Emergency Project (Section 21080(b)(4); 15269(b) &amp;(c)</li> <li>• Regional Water Quality Control Board 401 Water Quality Certification Enrollment</li> <li>• Army Corps of Engineers (ACOE) Regional General Permit 63 Emergency; SPL-2016-00012-RAG</li> <li>• California Dept. of Fish and Wildlife (CDFW) Lake or Streambed Alteration Agreement (1600); Notification of Emergency Work</li> </ul>
10	Does the IMP call for a pre-maintenance meeting, if identified in the associated IBA? (Mitigation Measure 4.3.6)	Y	The pre-maintenance meeting was conducted on site on the first day of emergency maintenance (1/20/2016).

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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)	Y	See Attachment E – IBA, Mitigation. Mitigation is provided through onsite restoration of natural flood channel.
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)	N/A	See response to #11 above and Attachment E – IBA; Mitigation. Mitigation is provided through onsite restoration of natural flood channel.
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)	N/A	See Attachment E – IBA; Maintenance Impacts. No upland impacts requiring mitigation occurred as part of this emergency maintenance.
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 MHPA at a ratio of 1:1, to be accomplished within six months of the date of maintenance completion? (Mitigation Measure 4.3.12)	N/A	See Attachment E – IBA. No suitable coastal California gnatcatcher habitat was impacted as part of this emergency channel maintenance.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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"> <li>• Has fencing, flagging, signage, or other means to protect sensitive resources been implemented?</li> <li>• Are noise attenuation measures needed to protect sensitive wildlife in place and effective?</li> <li>• Have nesting raptors been identified and necessary maintenance setbacks have been established if maintenance is to occur between February 1 and August 1?</li> </ul> <p>(Mitigation Measure 4.3.13)</p>	N	<p>See Attachment E – IBA.</p> <p>The monitoring biologist verified that no sensitive resources had the potential to be impacted by this emergency maintenance.</p> <p>A raptor nesting survey was conducted on the first monitoring day after the start of the breeding season, January 20, 2016, and no nests were found within 500 feet of the maintenance area nor were any encountered during the maintenance period. Work occurred prior to February 1; therefore no other setbacks or noise attenuation measures were required in conformance with the Master Program and PEIR.</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? (Mitigation Measures 4.3.14)</p>	N/A	<p>See response to #11 above and Attachment E – IBA; Mitigation. Mitigation is provided through onsite restoration of natural flood channel.</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>	N/A	<p>See Attachment E – IBA. The emergency channel maintenance area is concrete-and-earthen-lined, but the potential for listed or endemic plant species to occur was low and none were observed.</p>
18	<p>Would maintenance activities meet setback requirements for sensitive species? (Mitigation Measure 4.3.16)</p>	Y	<p>See Attachment E – IBA. Yes, the maintenance activities would meet the setback requirements for sensitive species as no work occurred during the breeding season of sensitive or avian species defined in Mitigation Measure 4.3.16.</p>

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<b>No.</b>	<b>Measure/Criteria</b>	<b>Y/N/NA</b>	<b>Basis for Determination (attach separate sheet(s) as necessary)</b>
19	Would clearing, grubbing, or grading (inside and outside the MHPA) be restricted during the breeding season of any 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)	N/A	See Attachment E – IBA. No clearing, grubbing, and grading occurred during the breeding season of any listed species; therefore no protocol surveys were conducted. Therefore, no mitigation measures for these impacts were included in the IBA.
20	Has evidence been submitted to document that protocol surveys have been conducted for potentially occurring sensitive bird species? (Mitigation Measure 4.3.18)	N/A	See response to #19 above; No clearing, grubbing, or grading occurred during the breeding season of any listed species; therefore no protocol surveys were conducted.
21	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)	Y	See Attachment E – IBA. The IBA includes avoidance of dredging during the sensitive bird breeding season. With respect to Mitigation Measure 4.3.19, 20, and 21, since work was conducted outside of the avian breeding season and since there was no potential for sensitive species to occur within the emergency impact area, no protocol surveys were conducted.  In addition, see response to #15 above in reference to noise attenuation measures for sensitive wildlife.
22	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)	N	See Attachment E – IBA. No trees were removed as part of this maintenance. All work was limited to outside of the avian breeding season to prevent impacts to nesting raptors or other bird species.
23	Would maintenance activities occur at known localities for listed fish species? If yes, would maintenance include appropriate mitigation? (Mitigation Measure 4.3.23)	N	See Attachment E – IBA. There are no known listed fish species occurring within the emergency channel maintenance area.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
<b>Biological Resources (cont.)</b>			
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	See Attachment E – IBA. Listed/narrow endemic plants were not found and are not expected to be found within the emergency maintenance footprint.
25	If maintenance is proposed during the nesting season of avian species, including those species not covered by the 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)	N/A	See Attachment E – IBA. No work occurred during the nesting season of any avian species.
<b>Historical Resources</b>			
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	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). Affinis prepared an IHA in 2008 for the channels. An updated records search and monitoring program were implemented by Dudek. This channel was determined to be low potential and therefore did not require an IHA.
27	Has an Individual Historical Assessment (IHA) been prepared for the proposed maintenance? (Mitigation Measure 4.4.1)	Y	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). Per a Historical Assessment prepared by Affinis, it was determined that the channel has low potential in 2008 and therefore did not require an IHA. An updated records search and monitoring program were implemented by Dudek.
28	If required, has a field survey of the maintenance activity APE been performed by a qualified archaeologist and a Native American monitor? (Mitigation Measure 4.4.1)	Y	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). The APE was surveyed in 2015-16 by Dudek during monitoring efforts.
29	Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1)	Y	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). Yes, a records search was prepared as part of the monitoring efforts by Dudek.



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<b>No.</b>	<b>Measure/Criteria</b>	<b>Y/N/NA</b>	<b>Basis for Determination (attach separate sheet(s) as necessary)</b>
30	Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1)	N	See SCR Memo. A testing program was not necessary based on the extensive disturbances in the channel and low potential/absence of significance resources in the maintenance area at this time.
31	Have significant historical resources been identified within the proposed maintenance activity APE? If yes, address criteria numbers 36 through 42. If no, proceed to criteria number 43. (Mitigation Measures 4.4.1 and 4.4.2)	N	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). No historical resources were identified in the APE during monitoring or in the records search.
32	Has a Principal Investigator (PI) been selected and approved by the SWD and ADD Environmental Designee? (Mitigation Measure 4.4.2.1)	Y	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). Brad Comeau is the selected and approved Principal Investigator (PI) for the project.
33	Have mitigation recommendations from the IHA been incorporated into the IMP to the satisfaction of the PI and the ADD Environmental Designee? (Mitigation Measure 4.4.2.2)	Y	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). Washington Channel Map 84 is primarily concrete-lined with a small earthen-bottom section at the west end. The channel segments which are concrete lined have no potential for intact archaeological deposits, as all sediments within them have been deposited as a result of erosion. No monitoring was performed for work which occurred in these portions of the channel. Sediments due to erosion also exist in the earthen channel portion and therefore also do not contain intact archaeological deposits. However, should channel maintenance intentionally or unintentionally impact the earthen channel below the sediment erosion deposits, it is possible that intact archaeological deposits could be impacted. Therefore, archaeological and Native American monitoring in the earthen portion of the channel was performed.

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<b>No.</b>	<b>Measure/Criteria</b>	<b>Y/N/NA</b>	<b>Basis for Determination (attach separate sheet(s) as necessary)</b>
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)	N/A	N/A. See SCR Memo and Attachment F – Cultural Appendix A (Confidential). Impacts to historical resources were not expected and did not occur during 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)	Y	A pre-maintenance meeting did occur and all required parties (crew and biologist) had the opportunity to attend.
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)	N/A	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). No human remains were discovered during maintenance in the APE. If human remains had been discovered, Public Resource Code (Sec.5097.98) and State Health and Safety Code (Sec. 7050.5) would have been implemented.
37	Will the PI and Archaeologist assume required responsibilities? (Mitigation Measures 4.4.2.6, 4.4.2.7, and 4.4.2.8)	Y	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). The PI, Brad Comeau has assumed all required responsibilities.
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)	N/A	See SCR Memo and Attachment F – Cultural Appendix A (Confidential). The potential for occurrence of significant historical resources is low and no impacts were expected; therefore no measures were implemented. Archaeological and Native American monitoring was implemented in case human remains or archaeological materials were identified during emergency maintenance in the channel.
<b>Land Use</b>			
39	Has the ADD Environmental Designee verified that all MHPA boundaries and limits of work have been delineated on all maintenance documents? (Mitigation Measure 4.1.1)	Y	There are no MHPA boundaries within or adjacent to the emergency channel maintenance area.

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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)	N/A	See Attachment E - IBA. There are no MHPA boundaries within or adjacent to the emergency channel maintenance area and no work was conducted during the breeding season of any sensitive or avian species.
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)	N/A	See SCR Memo; Noise Assessment. A raptor nesting survey was conducted on the first monitoring day after the start of the breeding season, January 20, 2016, and no nests were found within 500 feet of the maintenance area nor were any encountered during the maintenance period. No work was conducted during the breeding season of any other sensitive species, therefore no technical noise analysis was conducted.
42	Would the proposed maintenance have the potential to impact breeding activities of listed species? If yes, would maintenance activities be restricted to the breeding season? (Mitigation Measure 4.1.4)	N	See #40&41 above. See also Attachment E - IBA. No work was conducted during the breeding season of any listed or avian species.
<b>Master Program PEIR Mitigation, Monitoring, and Reporting Program</b>			
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)	N/A	See #40, 41, & 42 above. See also Attachment E - IBA. No listed species were identified as being potentially significantly affected by the maintenance and work occurred outside of the breeding season of listed species, therefore no mitigation measures were necessary.
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	See Attachment E – IBA. The pre-maintenance meeting, attended by participants required in Mitigation Measure 4.1.6, was planned and conducted on site on the first day of emergency maintenance (1/20/2016).

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45	Does the IMP include appropriate maintenance designs? (Mitigation Measure 4.1.7)	Y	See Attachment E – IBA and SCR Memo; Individual Maintenance Plan section.
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)	Y	See Attachment E – IBA. The project is not within or adjacent to the MHPA.
<b>Master Program Protocols</b>			
<b>Water Quality</b>			
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)	Y	See Attachment E – IBA and SCR Memo, Individual Maintenance Plan section and Water Quality Assessment section for measures implemented. Since this work was conducted as emergency channel maintenance, no Water Pollution Control Plan was drafted and no formal IMP was prepared.
48	Does the IMP include measures to prevent off-site sediment transport during maintenance through the use 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)	Y	See Attachment E – IBA and SCR Memo, Individual Maintenance Plan section and Water Quality section for measures implemented. No formal IMP was prepared due to the emergency nature of work.
49	Does the IMP require storage of BMP materials on-site in a way that provides complete protection of exposed areas and prevent off-site sediment transport? (WQ-3)	Y	See SCR Memo, Individual Maintenance Plan section.
50	Does the IMP require training for personnel responsible for the proper installation, inspection, and maintenance of on-site BMPs. (WQ-4)	Y	City field crews are trained on the proper installation and maintenance of BMPs used during maintenance activities. See SCR Memo, Individual Maintenance Plan section.

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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)	N	See Attachment E – IBA. No revegetation was required as part of this maintenance because all impacts and staging occurred on developed or disturbed lands.
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)	N/A	No sampling was required as work was conducted using pumps as necessary to bypass flows downstream and out of work areas. Additionally, crews set up sand bag berms to prevent any downstream flow from entering work areas.
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)	Y	See SCR Memo. Due to the emergency nature of the project, a formal IMP was not prepared. However, hazardous materials were not stored near storm water facilities during the emergency.
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)	Y	See SCR Memo. Due to the emergency nature of the project, a formal IMP was not prepared. However, maintenance related trash was not stored within 50 feet of the facility and was promptly removed from the site.
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)	N	See SCR Memo. Due to the emergency nature of the project, a formal IHHA and IMP were not prepared.
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)	Y	The earthen section of the channel will require review for erosion and adequate control measures will be implemented.

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57	Does the IMP incorporate mitigation measures identified in the IWQA and/or Table 4.8-8 of the PEIR?	Y	See SCR Memo.
<b>Master Program Protocols (cont.)</b>			
<b>Biological Resource Protection</b>			
58	Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1)	Y	See Attachment G - Regulatory Permits and SCR Memo; Individual Maintenance Plan. All vehicles were restricted to access areas defined in the agency emergency permit applications.
59	Does the IMP require delineation and flagging of all sensitive biological resources to remain within or adjacent to the maintenance area? (BIO-2)	N/A	See Attachment E – IBA and SCR Memo; Individual Maintenance Plan. No sensitive biological resources to remain were identified within or adjacent to the maintenance area.
60	Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3)	Y	Refer to #59 above. No sensitive biological resources to remain were identified within or adjacent to the maintenance area. Nevertheless, a pre-maintenance meeting including a monitoring biologist was conducted on site on the first day of emergency maintenance (1/20/2016).
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	See Attachment E – IBA and SCR Memo, Individual Maintenance Plan section.
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)	N/A	See Attachment E – IBA. A raptor nesting survey was conducted on the first monitoring day after the start of the breeding season, January 20, 2016, and no nests were found within 500 feet of the maintenance area nor were any encountered during the maintenance period. No work was conducted during the breeding season of any other sensitive or avian species.

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63	If arundo will be removed during maintenance, does the IMP include appropriate removal methods to minimize downstream dispersal? (BIO-6)	Y	See Attachment E – IBA. Arundo was removed as part of this emergency maintenance. However, there was no flowing water during maintenance and all rhizomes were removed or treated; therefore there was minimal chance of downstream dispersal.
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)	N/A	See Attachment E – IBA. A raptor nesting survey was conducted on the first monitoring day after the start of the breeding season, January 20, 2016, and no nests were found within 500 feet of the maintenance area nor were any encountered during the maintenance period.
65	Does the IMP include measures to minimize the potential for entrapping wildlife when implementing erosion control measures? (BIO-8).	Y	See SCR Memo; Individual Maintenance Plan section. All BMPs were removed following the completion of maintenance and the potential for entrapping wildlife while implementing any erosion control measures was low.
<b>Historical Resource Protection</b>			
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)	N/A	See SCR Memo; Attachment F - Cultural Appendix A (Confidential). The historical records search indicated that potential for historical resource areas in and around the channel maintenance was low, therefore no flagging, capping, or fencing occurred or was required.
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)	N	See SCR Memo; Attachment F - Cultural Appendix A (Confidential). Due to the low likelihood of historical resources being present within the channel bottom areas that were subject to excavation, the historical records did not require a pre-maintenance meeting for this work.

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

No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
<b>Waste Management</b>			
68	Does the IMP call for disposal of compostable green waste material at an approved composting facility, if available? (WM-1)	N	See SCR Memo, Individual Maintenance Plan section. Due to the emergency nature of the work, a formal IMP was not prepared and there was no opportunity for the disposal of compostable material to a composting facility 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)	N	See SCR Memo. Due to the emergency nature of the work, a formal IMP was not prepared and there was no opportunity for the re-use of material 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)	Y	This work was conducted as an Emergency Channel Maintenance project and no tires were encountered 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)	Y	See SCR Memo. Due to the emergency nature of the work, a formal IMP was not prepared. However per the SCR Memo, Water Quality Assessment section, spill containment materials were available during emergency maintenance; and no hazardous materials were encountered during maintenance.