

PTS# _____

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.

Date: May 15, 2018

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ACTIVITY INFORMATION

Master Program Map #s): 66

City Equipment #(s): Gradall (5100 Series), Track Steer (CAT 2890), Excavator (CAT 349), Front-end Loader (CAT 966), Dump Trucks (12 yard), and 6" or smaller pumps

Creek Name: Montezuma

Watershed(s): Lower San Diego River

Location: ~4891-4896 54th Street; South of I-8 and east of Collwood Boulevard.

DOCUMENTS INCLUDED IN CONSISTENCY DETERMINATION PACKAGE

Included	NA	Document
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Maintenance Plan (IMP) – Appendix A
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Biological Assessment (IBA) – Appendix B
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Historical Assessment (IHA) – Appendix C
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Hydrologic and Hydraulic Assessment (IHHA) – Appendix D
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Water Quality Assessment (IWQA) –Appendix E
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Noise Assessment (INA) – Appendix F
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Water Pollution Control Plan (WPCP) – Appendix G
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Stadium Wetland Mitigation Project (San Diego River) Mitigation Plan (Appendix H) ¹

¹ Included as hyperlink only: <https://www.sandiego.gov/sites/default/files/legacy/stormwater/pdf/alvaradomitigationplan.pdf>

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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>See Sheet 4 of the IMP (Attachment B) MMP Protocol Requirements. Also see the "Mitigation" Sections of the following individual technical assessments for applicable mitigation measures from the PEIR and any additional recommended mitigation for each resource area:</p> <ul style="list-style-type: none"> • Biological Resources - IBA (Appendix B) • Historical Resources - IHA (Appendix C) • Land Use, see IBA (Appendix C), INA (Appendix F). • Paleontological Resources: N/A. Based on the geological setting of the channel, the potential for in situ paleontological resources is considered to be very low. This conclusion is based on the channelized nature of Montezuma Channel, its deep entrenchment in very old alluvial deposits, and the location of the project within an artificial and active fluvial environment. Further, the area has been impacted not only by the creation of the channel itself, but also the installation of sewer lines and other utilities. See INA (Appendix F). <p>No additional impacts to upland vegetation would occur as a result of using the revised staging area and access and loading route locations that are not already evaluated and disclosed by the PEIR. Mitigation and avoidance measures are consistent with the PEIR are described in the individual technical assessments.</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	As required by Note 3 under Master Storm Water System Maintenance Program (MMP) Protocol Requirements (Sheet 4 of the IMP), a pre-maintenance meeting will be scheduled in coordination with MMC prior to initiating project activities. A qualified biologist, field engineer, planner, equipment operators, and other key personnel will be required and included in the pre-maintenance meeting. Since anticipated maintenance, access, and staging areas would occur within previously disturbed areas with a low likelihood of discovering historical or paleontological resources, a historical and paleontological monitor will

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			not be required. <ul style="list-style-type: none"> • See Biological Resources - IBA (Appendix B) • See Historical Resources - IHA (Appendix C)
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	For this project, the following permits and other approvals have been issued or pending authorization: <ul style="list-style-type: none"> • Substantial Conformance Review for City of San Diego Master Site Development Permit No. 1134892 • Regional Water Quality Control Board (RWQCB) 401 Water Quality Certification • Army Corps of Engineers (ACOE) 404 Nationwide Permit • California Dept. of Fish and Wildlife (CDFW) 1600 Streambed Alteration Agreement (1602)
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	As indicated in response to No. 3, an application for authorization under Section 1602 of the Fish and Game Code is pending.
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)	Y	The IBA (Appendix B) was prepared by ESA biologist Tommy Molioo, who meets the qualifications specified in the City of San Diego Guidelines for Conducting Biology Surveys (June 2012 revision) and covers all potentially impacted areas that are specified in the IMP (Appendix A).
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)	TBD	Requires further City review of the IMP and IBA to satisfy this requirement prior to initiation of any proposed annual maintenance activity.
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 response to No. 5, above.

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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)	NA	The mitigation efforts associated with this project will be funded by the T&SWD's annual budget. A Departmental Internal Order (I/O) number/account has been set up to track mitigation costs to allocate appropriate funding to implement associated biological mitigation projects.
9	Has evidence been provided documenting approval of the proposed maintenance by permitting authorities? (Mitigation Measure 4.3.5)	Pending	T&SWD will provide final authorization to comply with permitting authorities prior to final approval.
10	Does the IMP call for a pre-maintenance meeting, if identified in the associated IBA? (Mitigation Measure 4.3.6)	Y	See response to No. 2, above. See IMP Sheet 4 –MMP Protocol Requirement No. 3.
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	<p>Impacts to USACE, RWQCB, and CDFW jurisdictional earthen-bottom channel from maintenance will amount to 0.097 acre. Mitigation is proposed at a 2:1 ratio for wetland impacts, resulting in a total mitigation requirement of 0.039 acre.</p> <p>The IBA proposes mitigation ratios that are consistent with those identified in the Settlement Agreement related to the Final PEIR for the MMP. The Settlement Agreement ratios supersede the ratios identified in PEIR Table 4.3-10. Proposed compensatory mitigation is proposed as follows for impacts to City wetlands:</p> <p>Impacts to 0.017 acre of freshwater marsh would be mitigated at 4:1 and impacts to streambed would be mitigated at 2:1 for a total of 0.078 acres of mitigation proposed. No mitigation is proposed for impacts to palm-dominated disturbed wetlands or for activities occurring within non-vegetated concrete-lined channel. The 0.078 acre of compensatory mitigation would be fulfilled through riparian woodland rehabilitation and enhancement at the Stadium Wetland Mitigation Site. Because riparian woodland is of equal or higher value than the habitats that are projected to be impacted by the Montezuma Channel project, 0.02 acre of riparian woodland rehabilitation is proposed to address 1:1 of the total mitigation requirement, and 0.06 acre of riparian woodland</p>

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			enhancement is proposed to address the remaining mitigation need over and above the 1:1 replacement ratio.
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	See response to No. 11, above. See Appendix H (Stadium Wetland Mitigation Project (San Diego River) Mitigation Plan). This wetland mitigation plans has been prepared consistent with the PEIR's BTR Conceptual Mitigation Plan requirements.
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	As identified in Appendix B – IBA, upland impacts would consist of 0.041 acre of Non-Native Grassland (Tier IIIB) and 0.009 acre of Disturbed Habitat/Non-Native Vegetation/Ornamental (Tier IV). In accordance with the amended MMP PEIR mitigation measure 4.3.11 and the City's Biological Resources Guidelines, no mitigation is required for Developed or Disturbed upland habitats. All impacted habitats are outside of MPHA; therefore, in accordance with amended MMP PEIR mitigation measure 4.3.11, impacts to Non-Native Grassland would be mitigated offsite at 0.5:1, for a total mitigation requirement for City uplands of 0.021 acre. In accordance with PEIR mitigation measure 4.3.11, upland impacts will be mitigated through payment into the City's Habitat Acquisition Fund, acquisition and preservation of specific land, or purchase of mitigation credits.
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)	NA	No <u>direct impacts</u> to coastal California gnatcatcher (CAGN) habitat (i.e. Coastal Sage Scrub) would occur. While Southern Mixed Chaparral habitat occurs within the biological survey area, this habitat is not within the project impact area and was not determined to be suitable for gnatcatcher in the IBA, so no indirect impacts would occur. Potentially suitable CAGN habitat was not identified within 500 feet of the maintenance area. Additionally, maintenance would avoid work during the avian breeding season (March 1 – August 15). See Appendix B – IBA.
15	If sensitive biological resources may be impacted, would the monitoring biologist be able to verify that the following actions have been taken:	Y	See Appendix B – IBA and Appendix F – INA. The monitoring biologist will verify compliance with these items before

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	<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? (Mitigation Measure 4.3.13) 		<p>and during maintenance activities.</p> <p>Note: Work proposed outside the avian breeding season would not result in a significant indirect noise impact and no noise mitigation is required. Applicable raptor/bird nesting and sensitive wildlife protocol surveys are required if work is proposed during the breeding season and mitigation measures, such as avoidance, will be implemented in conformance with the Master Program and PEIR.</p>
16	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)	Y	<p>See response to No. 11, above.</p> <p>See Appendix H (Stadium (San Diego River) Wetland Mitigation Project Mitigation Plan). This wetland mitigation plan has been prepared consistent with the PEIR's BTR Conceptual Mitigation Plan requirements.</p>
17	Does the IBA discuss appropriate actions to offset impacts to listed or endemic sensitive plant species? (Mitigation Measure 4.3.15)	Y	See Appendix B – IBA. No impacts to populations of San Diego sagewort would occur as a result of maintenance, as the populations occur outside the project limits (per the IMP, as revised March 23, 2018).
18	Would maintenance activities meet setback requirements for sensitive species? (Mitigation Measure 4.3.16)	Y	See Appendix B – IBA. Yes, the maintenance activities would meet the setback requirements for sensitive species.
19	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)	Y	See Appendix B – IBA. Yes, clearing, grubbing, and grading would be restricted during the breeding season of listed species. No sensitive species requiring “protocol surveys” were identified as having potential to occur 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)	NA	See Appendix B – IBA. Habitat for sensitive bird species does not occur within or adjacent to the maintenance area. Additionally, maintenance would occur outside of the breeding season for sensitive bird species.
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 Appendix B – IBA. Suitable habitat for sensitive bird species is not present near the proposed maintenance area. Additionally, the IBA includes avoidance of sensitive bird breeding seasons.
22	Would removal of any eucalyptus trees or other trees used by	N	The project does not propose removal of any eucalyptus or other trees in

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	raptors for nesting be proposed within the maintenance area? If yes, would maintenance include appropriate setbacks and limitations? (Mitigation Measure 4.3.22)		the maintenance area that could be used by raptors. In addition, the IBA includes setbacks, as discussed under No. 18 above.
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	There are no known listed fish species occurring within the project area.
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?	Y	See Appendix B – IBA. San Diego sagewort populations will be avoided, as they occur outside the project boundary (per the IMP, as revised March 23, 2018). Populations would be flagged for avoidance, in accordance with PEIR MM 4.2.24.
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)	Y	See Appendix B – IBA. As an avoidance measure, maintenance should occur outside of the avian breeding season. If maintenance is necessary during the avian nesting season, a nesting survey would be conducted immediately prior to maintenance (within 3 days prior to the start of maintenance) so that any active nests could be avoided and appropriate buffers are adhered to during maintenance that could not be postponed due to an imminent threat to human life or property.
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	Qualified archaeologist Michael Bever of Environmental Science Associates has determined that the project occurs in an area of low archaeological sensitivity and has prepared an IHA (Appendix C) to document resource potential. Given the low potential for resources within the project site and the nature of the proposed maintenance work, which would be minimally invasive into undisturbed natural deposits (e.g., palm trees will be cut down, leaving trunk stumps and root balls in place), the project has a low potential for impacts to archaeological resources. No additional impacts would occur as a result of using the newly proposed staging area and access route. Therefore, the IHA concludes that no mitigation measures are necessary outside of PEIR Mitigation Measure 4.4.1, as stated in the IHA (Appendix C - IHA, Mitigation).
27	Has an Individual Historical Assessment (IHA) been prepared for the proposed maintenance? (Mitigation Measure 4.4.1)	Y	See Appendix C – IHA. An IHA has been prepared in compliance with the City of San Diego Historical Resources Guidelines and MMP.

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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 Appendix C – IHA. A pedestrian survey of the APE was conducted on December 6, 2017, by Michael Bever, PhD, RPA from ESA, accompanied by Native American monitor Anthony LaChapa from Red Tail Monitoring and Research, Inc.
29	Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1)	Y	See Appendix C – IHA, Attachments A and B. ESA conducted a records search for the APE on November 22, 2017, at the South Coastal Information Center (SCIC). This included the new proposed staging area and access route. The records search included a review of all previously recorded cultural resources and cultural resources investigations within a 1-mile radius of the APE. In addition, the California Register of Historical Resources (California Register), the National Register of Historic Places (National Register), and the California State Historic Resources Inventory (HRI) listings were reviewed. Available historic maps and aerial photographs were also consulted.
30	Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1)	N	Since the potential to encounter historical resources is considered low, testing is not required.
31	Have significant historical resources been identified within the proposed maintenance activity APE? If yes, address criteria numbers 36 through 38. If no, proceed to criteria number 39. (Mitigation Measures 4.4.1 and 4.4.2)	N	There are no known significant resources within the APE.
32	Has a Principal Investigator (PI) been selected and approved by the SWD and ADD Environmental Designee? (Mitigation Measure 4.4.2.1)	N	Archaeological monitoring would not be required for maintenance due to the low potential to encounter resources.
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	Mitigation measures are included for inadvertent finds; by project design, all known resources are being avoided.
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	No significant resources are present within the APE and none will be impacted.
35	Has a pre-maintenance meeting been planned and/or conducted on	NA	Significant archaeological impacts are not anticipated; therefore a PI or

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	site, including representatives from the PI, Native American consultant, SWD, MMC, Resident Engineer (RE), and MC? (Mitigation Measure 4.4.2.4)		Native American consultant would not be required at the pre-maintenance meeting.
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)	Y	NA
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	NA
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	The potential for the occurrence of resources in the APE is considered low in the IHA and no known significant resources are present within the APE.
Land Use			
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)	NA	Maintenance is planned in MMP Map 66 (Reach 2). This facility is not located within, or immediately adjacent to, the MHPA. The nearest portion of the MHPA is depicted on Figure 1 of the IBA.
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	See Appendix B – IBA. No potential habitat areas for listed species requiring protocol surveys were identified within the maintenance area or 500-foot buffer in the IBA. San Diego sagewort populations would be flagged and avoided, as they are outside the project area (per the IMP, as revised March 23, 2018).
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)	Y	See Appendix F - INA. An ambient noise monitoring survey of Reach 2 was conducted on December 11, 2017, by Jeff Goodson from Environmental Science Associates (ESA).
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	See Appendix B – IBA. Maintenance would be completed outside of the avian breeding season.
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)	Y	If maintenance is required during the breeding season, PEIR Mitigation Measure 4.1.5 would be implemented, as specified in the INA (Appendix F).

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44	Has a pre-maintenance meeting been planned and/or conducted, including the MC, Project Biologist, and City representative? (Mitigation Measure 4.1.6)	N	See Response to No. 2, above. See Appendix B – IBA Mitigation Measure 3. The pre-maintenance meeting will be planned and/or conducted on site after SCR is approved.
45	Does the IMP include appropriate maintenance designs? (Mitigation Measure 4.1.7)	Y	See Appendix A - IMP, Construction BMP Notes and Construction BMP Requirements.
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	See response to Nos. 14 and 39, above. See Appendix B – IBA. Maintenance would not occur in, or within 500 feet of any area determined to support coastal California gnatcatchers.
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)	Y	See Appendix A – IMP Sheet 3. A dry weather flow diversion berm (tiger dam/sandbags) & diversion pump(s) will be placed at eastern limits of channel cleaning. Diversion pipes will be placed on the eastern side of the channel and extended to a discharge area west of the project maintenance limits. BMPs that will be implemented during maintenance have also been identified in Appendix G - Water Pollution Control Plan (WPCP).
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 response to No. 47 above. See Appendix A – IMP, Sheet 4 Maintenance BMP notes 12-14. Specific BMPs (e.g. fiber rolls, sandbags, etc.) that will be implemented to address erosion and sediment controls have also been identified in Appendix G - WPCP.
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 Note 13 included on IMP - Sheet 4 and in WPCP (Table 4 No. 13).
50	Does the IMP require training for personnel responsible for the proper installation, inspection, and maintenance of on-site BMPs. (WQ-4)	Y	See Note 14 included on IMP - Sheet 4.
51	Does the IMP require revegetation of spoil and staging areas within	Y	See Note 15 included on IMP - Sheet 3.

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	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)		
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)	Y	See Appendix A - IMP, Maintenance BMP Notes and Additional Maintenance Requirements (Sheet 3).
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 Note 16 included on Appendix A – IMP, Sheet 3.
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 Note 17 included on Appendix A – IMP, Sheet 3.
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)	Y/N	See Appendix D - IHHA recommends the installation of a check dam to reduce channel velocity. The IHHA does not recommend future removal of the check dam.
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	See Note 19 included on Appendix A – IMP, Sheet 3.
57	Does the IMP incorporate mitigation measures identified in the IWQA and/or Table 4.8-8 of the PEIR?	NA	See Appendix E – IWQA. The IWQA determined that, due to no dry weather flow, there are no negative water quality impacts associated with channel maintenance, therefore, no additional mitigation is recommended and PEIR Mitigation Measure 4.8.1 would not apply. Additionally, the proposed maintenance includes installation of a check dam, which is identified as a mitigation measure for reducing metals, sediment, and trash in the Table 4.8-8 of the PEIR.

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Biological Resource Protection			
58	Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1)	Y	Note 1 under MMP Protocol Requirements on Sheet 4 of the IMP requires all vehicles to remain in the access areas designated in the MMP. See Appendix B - IBA page 8, Applicable Maintenance Protocol No. 1
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	Note 2 under MMP Protocol Requirements on Sheet 4 of the IMP requires flagging of all sensitive biological resources to remain within or adjacent to the maintenance area. See Appendix B - IBA page 8, Applicable Maintenance Protocol No. 2
60	Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3)	Y	Note 3 under MMP Protocol Requirements on Sheet 4 of the IMP requires a pre-maintenance meeting. See Appendix B - IBA page 8, Applicable Maintenance Protocol No. 3
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	Note 4 under MMP Protocol Requirements on Sheet 4 of the IMP identifies erosion control measures are designed to avoid introduction of invasive plant species. See Appendix B - IBA page 8, Applicable Maintenance Protocol No. 4
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)	Y	See Note 5 under MMP Protocol Requirements on Sheet 4 of the IMP. See Appendix B - IBA page 8, Applicable Maintenance Protocol No. 5
63	If arundo will be removed during maintenance, does the IMP include appropriate removal methods to minimize downstream dispersal? (BIO-6)	NA	Note 6 under MMP Protocol Requirements on Sheet 4 of the IMP includes protocols for removal of arundo. See Appendix B - IBA page 8, Applicable Maintenance Protocol No. 6 (No arundo is proposed for removal)
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)	Y	Note 7 under MMP Protocol Requirements on Sheet 4 of the IMP includes this requirement. See Appendix B - IBA page 8, Applicable Maintenance Protocol No. 7
65	Does the IMP include measures to minimize the potential for entrapping wildlife when implementing erosion control measures?	Y	See Note 3 included on IMP - Sheet 4

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)
Master Program PEIR Mitigation, Monitoring, and Reporting Program			
	(BIO-8).		
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	See Appendix C – IHA. No flagging, capping or fencing of historical resources is required because no significant historical resources occur or have the potential to occur within the maintenance area.
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	See Appendix C – IHA. No significant historical resources occur or have the potential to occur within the maintenance area; therefore, an on-site pre-maintenance meeting to discuss avoidance of historical resources is not required.
Waste Management			
68	Does the IMP call for disposal of compostable green waste material at an approved composting facility, if available? (WM-1)	Y	See Note 8 included on IMP - Sheet 4
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)	Y/N	Note 9 included on IMP - Sheet 4, calls for re-use of excavated material, but does not recommend screening. Presence of significant waste debris is not expected. No sediment removal is proposed by the project.
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	See Note 10 included on IMP - Sheet 4
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 Note 11 included on IMP - Sheet 4