

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: May 17, 2018

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ACTIVITY INFORMATION

Master Program

Map #(s): 54

City Equipment #(s): 88000212, 88000214, 88000215

Creek Name: San Carlos Channel

Watershed(s): San Diego River

Location: San Carlos neighborhood in eastern San Diego located south of Navajo Road and west of State Route 125. Map 54 includes the channel segments located east of Cowles Mountain Boulevard and west of Lake Badin Avenue that parallel Lake Beaver Drive.

DOCUMENTS INCLUDED IN CONSISTENCY DETERMINATION PACKAGE

Included	NA	Document
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Maintenance Plan (IMP)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Biological Assessment (IBA)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Historical Assessment (IHA)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Individual Hydrologic and Hydraulic Assessment (IHHA)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Water Quality Assessment (IWQA)
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Individual Noise Assessment (INA)
<input checked="" type="checkbox"/>	<input 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	Due to the emergency nature of the work, maintenance documents and contract specifications were not developed.
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)	NA	Due to the emergency nature of the work, a formal pre-maintenance meeting was not conducted. However, the crew supervisor, environmental planner, and regulatory specialist/ecologist met onsite at the commencement of work.

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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	For this project, the following permits and other approvals have been issued: <ul style="list-style-type: none"> • Master Maintenance Program (MMP) • Master Maintenance Program Environmental Impact Report (PEIR) • City's Development Services Department (DSD) issued Emergency SDP (Permit No. 783268) and California Environmental Quality Act (CEQA) Environmental Exemption under CEQA Guidelines §15269-Emergency Projects • Regional General Permit 63 Notification submitted on November 1, 2014 to U.S. Army Corps of Engineers (USACE) and California Regional Water Quality Control Board (RWQCB). Both agencies replied that the work was exempt. • California Dept. of Fish and Wildlife (CDFW) Lake or Streambed Alteration Agreement (1600); Notification of Emergency Work
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	The City provided notification of emergency work under CDFW's Lake and Streambed Notification Program on November 13, 2014.
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	An IBA was prepared by a qualified biologist in accordance with the Master Maintenance Program (see Appendix B).

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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	Due to the emergency nature of the work, the IMP was developed post-project (see Appendix A). An IBA, also completed post-project is included as Appendix B.
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 B – IBA and response to #5, above.
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	Compensatory mitigation for wetland impacts is proposed at the Stadium Mitigation Site in the San Diego River constructed by the Public Utilities Department. TSWD is working with PUD to reserve wetland rehabilitation and enhancement credits at the site.
9	Has evidence been provided documenting approval of the proposed maintenance by permitting authorities? (Mitigation Measure 4.3.5)	NA	No approvals from state or federal agencies were required to conduct the emergency maintenance. Notifications per each of their regulations was provided at the time the emergency was determined.
10	Does the IMP call for a pre-maintenance meeting, if identified in the associated IBA? (Mitigation Measure 4.3.6)	NA	Due to the emergency nature of the work, a formal IMP was not developed. Due to the emergency nature of the work, a formal pre-maintenance meeting was not conducted. However, the crew supervisor, environmental planner, and regulatory specialist/ecologist met onsite at the commencement of work.
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	Mitigation is planned at the Stadium Mitigation Site. See response to #8, above.

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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	See response to #11 above and Appendix B – IBA; Mitigation. Mitigation locations and plans for impacts from this emergency channel maintenance will be provided at the Stadium Mitigation Site.
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	No sensitive upland vegetation was impacted. Therefore, no compensation was required. (See Appendix B – IBA).
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 suitable coastal California gnatcatcher habitat occurred within the maintenance area or was impacted as part of this emergency channel maintenance. (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: <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)	NA	See Appendix B – IBA. The monitoring biologist verified that no sensitive resources (beyond vegetation that was removed to alleviate the emergency) had the potential to be impacted by this emergency maintenance. Work occurred outside of the avian breeding season; therefore no bird surveys or noise attenuation measures were required in conformance with the Master Program and PEIR.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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)	N	See response to #8 above and Appendix B – IBA; Mitigation. Mitigation will be provided at the Stadium Mitigation Site.
17	Does the IBA discuss appropriate actions to offset impacts to listed or endemic sensitive plant species? (Mitigation Measure 4.3.15)	N	The emergency channel maintenance area is entirely concrete-lined and the potential for listed or endemic plant species to occur was low. (See Appendix B – IBA)
18	Would maintenance activities meet setback requirements for sensitive species? (Mitigation Measure 4.3.16)	Y	The maintenance activities would meet the setback requirements for sensitive species as no work occurred during the avian breeding season defined in Mitigation Measure 4.3.16 and potential for sensitive species is low. (See response to #15 above and Appendix B – IBA)
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	No clearing, grubbing, and grading occurred during the breeding season of any listed species; therefore no protocol surveys were conducted and no mitigation was or is required.
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 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	No mitigation measures were required to protect sensitive bird species because none occurred within 750 feet. Furthermore, the maintenance took place outside of the sensitive bird breeding season.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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	No non-native trees were removed, therefore no setbacks and limitations were included in the maintenance plan.
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 emergency channel maintenance 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?	N	Listed/narrow endemic plants were not found and are not expected to be found within the emergency maintenance footprint. (See Appendix B – IBA)
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)	NA	Emergency maintenance was not performed during the avian breeding season.
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	It was determined that because the entire length of the channel maintenance area is concrete-lined, potential for impacts to significant historical resources was very low. (See Appendix C – IHA)
27	Has an Individual Historical Assessment (IHA) been prepared for the proposed maintenance? (Mitigation Measure 4.4.1)	Y	See Appendix C – IHA. The entire length of the emergency channel maintenance area is concrete-lined and potential impacts to significant historical resources were not expected.
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)	NA	See Appendix C - IHA. The entire length of the emergency channel maintenance area is concrete-lined and no impacts to significant historical resources were expected, therefore no field survey was conducted.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
29	Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1)	NA	See Appendix C - IHA. The entire length of the emergency channel maintenance area is concrete-lined and potential for significant historical resources was low; therefore, no record search was requested.
30	Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1)	NA	See Appendix C - IHA. The entire length of the emergency channel maintenance area is concrete-lined and potential for significant historical resources was low, therefore no historical testing program was performed.
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 Appendix C - IHA. The entire length of the emergency channel maintenance area is concrete-lined and no significant historical resources were identified within the emergency channel maintenance APE .
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 is not required.
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)	NA	See Appendix C - IHA. The entire length or the channel maintenance area is concrete-lined, therefore impacts to significant historical resources were not expected and no mitigation is 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	See Appendix C - IHA. The entire length or the channel maintenance area is concrete-lined, therefore impacts to significant historical resources were not expected.
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 was not required.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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 emergency 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 were 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	See Appendix C - IHA. The entire length or the channel maintenance area is concrete-lined, therefore the potential for occurrence of significant historical resources is low and no impacts were not expected.
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)	Y	There are no MHPA boundaries within or adjacent to the emergency channel maintenance area.
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)	NA	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. As indicated in the IBA, no coastal California gnatcatcher or least Bell's vireo were expected to occur within 750 feet of the maintenance. Thus, no protocol surveys were required.
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 work was conducted during the breeding season of any sensitive or avian species, therefore no technical noise analysis was conducted. (See Appendix E – INA)

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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	As the maintenance occurred outside the breeding season of sensitive birds, the maintenance would not have impacted sensitive birds. Furthermore, as indicated in the IBA, no sensitive birds occurred within 750 feet of the maintenance.
Master Program PEIR Mitigation, Monitoring, and Reporting Program			
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	See #40, 41, & 42 above. As emergency maintenance occurred prior to the identified breeding seasons, no measures need to be taken.
44	Has a pre-maintenance meeting been planned and/or conducted, including the MC, Project Biologist, and City representative? (Mitigation Measure 4.1.6)	NA	See Appendix B – IBA. As indicated in response to No. 2, a pre-maintenance meeting was not feasible given the emergency nature of the work. However, the crew supervisor, environmental planner, and regulatory specialist/ecologist met onsite at the commencement of work.
45	Does the IMP include appropriate maintenance designs? (Mitigation Measure 4.1.7)	Y	As indicated in the Maintenance Methodology Table included as Appendix A, maintenance included a vector truck at the downstream end of the maintenance to collect water and debris during the maintenance to protect downstream areas.
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	As indicated in Response No. 14, no suitable habitat for coastal California gnatcatcher occurs within the maintenance boundary. The location of the MHPA with respect to the maintenance and the absence of coastal California gnatcatcher habitat has been verified by the ADD.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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	Since this work was conducted as emergency channel maintenance, no Water Pollution Control Plan was drafted.
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	Per the Maintenance Methodology Table, the City placed a vacor truck at the downstream end of the maintenance to collect water and sediment during maintenance to protect downstream areas. Street sweeping was conducted in the area immediately after maintenance.
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)	NA	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	Each Storm Water Operation and Maintenance field personnel employee is initially provided with training in the proper installation, inspection, and maintenance of on-site BMPs. Additionally, each employee receives refresher training annually.
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	The staging area was revegetated post-project and monitored/maintained for a period of 25 months. .

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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 activities to maintain the original purpose of the facility .
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	No hazardous materials were stored during the maintenance and no equipment refueling occurred.
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	No storage of trash occurred during maintenance. All trash was transported directly to Miramar Landfill
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	The project did not require a check dam or other any other mechanism.
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	The entire length of the emergency channel maintenance area is concrete-lined; therefore, inspections are not required.

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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	An IWQA was not prepared due to the emergency nature of the maintenance which did not allow sufficient time to complete an IWQA. However, as noted earlier, the maintenance did include a vactor truck at the downstream end to collect water and debris during maintenance to protect downstream areas. In addition, street sweeping was carried out immediately after the maintenance.
Master Program Protocols (cont.)			
Biological Resource Protection			
58	Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1)	Y	All vehicular access was restricted to areas designated in the amended MMP.
59	Does the IMP require delineation and flagging of all sensitive biological resources to remain within or adjacent to the maintenance area? (BIO-2)	NA	The monitoring biologist verified that no sensitive resources (beyond vegetation that was removed to alleviate the emergency) had the potential to be impacted by this emergency maintenance.
60	Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3)	NA	As indicated in response to No. 2, a pre-maintenance meeting was not feasible given the emergency nature of the work. However, the crew supervisor, environmental planner, and regulatory specialist/ecologist met onsite at the commencement of work.
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	No erosion control was required as part of the maintenance work. Removal of invasive species occurred as part of this maintenance.
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	No work was conducted during the breeding season of any sensitive or avian species.
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 as part of this emergency maintenance. Thus, no specific controls were required.

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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 maintenance occurred outside of the breeding season for sensitive birds, including raptors, setbacks from nests were not required.
65	Does the IMP include measures to minimize the potential for entrapping wildlife when implementing erosion control measures? (BIO-8).	Y	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 the maintenance occurred in a concrete-lined channel which did not support significant historical resources (See Appendix C – IHA).
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	The entire length of the channel maintenance area is concrete-lined; therefore, impacts to significant historical resources were not expected and no pre-maintenance meeting was conducted.
Waste Management			
68	Does the IMP call for disposal of compostable green waste material at an approved composting facility, if available? (WM-1)	NA	This work was conducted as an Emergency Channel Maintenance project and there was no opportunity for the re-use of material during construction.
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	This work was conducted as an Emergency Channel Maintenance project and there was no opportunity for the re-use of material during construction.
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.

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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	Spill containment materials were available during emergency maintenance; however no hazardous materials were encountered during maintenance.