

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 Master Maintenance Protocols contained in the Master Program; and the SDP Conditions.

Date: May 26, 2015

Name of Preparer: Christine Rothman

Phone Number: (619) 527-3470

Email: CRothman@sandiego.gov

ACTIVITY INFORMATION

Master Program Map #(s): 59, 60, & 64

City Equipment #(s): Upper Alvarado: 88000003 (64), 88000002 (64); Lower Alvarado: 88000022 (59), 88000021 (59), 88000020 (59), 88000019 (60).
Portions of some segments are outside City jurisdiction.

Creek Name: Alvarado Creek Channel

Watershed(s): San Diego River

Location: The Upper and Lower Alvarado Creek channels are located in the City of San Diego's College East and Grantville neighborhoods; they are situated roughly parallel to Interstate 8 between Reservoir Drive and Fairmount Avenue.

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 – Appendix H

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			
General Mitigation			
1	Have mitigation measures for impacts to biological resources, historical resources, land use, and paleontological resources, as appropriate, been included in entirety on the submitted maintenance documents and contract specifications, under the heading, “Environmental Mitigation Requirements”? (General Mitigation Measure 1)	Y	<p>Mitigation measures are included in the following SCR Appendices:</p> <ul style="list-style-type: none"> • Individual Maintenance Plan (IMP) - see Appendix A • Individual Biological Assessment (IBA) - see Appendix B • Individual Water Quality Assessment (IWQA) –see Appendix E • Water Pollution Control Plan (WPCP) – see Appendix G <p>Mitigation related to historical and paleontological resources are not required. No activity-specific mitigation measures are required for land use.</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	<p>As required by Note #5 under Applicable PEIR Mitigation Measures (Sheet 6 of the IMP for Upper Alvarado and Sheet 8 of the IMP for Lower Alvarado), a pre-maintenance meeting will be scheduled in coordination with MMC prior to initiating project activities. A biological monitor, MC, City Storm Water Division representative, and a qualified water quality specialist will be required and included in the pre-maintenance meeting. A cultural resource monitor will be included in the pre-maintenance meeting related to LR2A. Since anticipated maintenance, access, and staging areas would occur within the preexisting channels or paved areas, and would not lower the channels below their original depth, the likelihood to discover paleontological resources is considered low. Consequently, a paleontological monitor is not required.</p>

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 (cont.)			
General Mitigation (cont.)			
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)	Pending	For this project, the following permits and other approvals are pending: <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)	Pending	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 HELIX biologists meeting the qualifications specified in the City of San Diego Guidelines for Conducting Biology Surveys (June 2012 revision), and covers each area proposed to be maintained in accordance with the specifications in the MMP.
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	<i>Note: Requires further City review of the IMP and IBA to satisfy this requirement prior to initiation of any proposed annual maintenance activity.</i>
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.

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 (cont.)			
Biological Resources (cont.)			
8	Has a mitigation account been established to provide sufficient funds to implement all biological mitigation associated with the proposed maintenance act? (Mitigation Measure 4.3.4)	Y	The mitigation 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.
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	The proposed maintenance will impact 1.08 acre of wetland habitat, consisting of freshwater marsh (0.63 acre) and southern willow scrub (0.45 acre). A total of 0.23 acres of non-wetland Waters will be impacted including non-native riparian (0.12 acre), open water (0.03 acre), non-native vegetation/ornamental (0.7 acre), and disturbed habitat (0.01 acre). Proposed mitigation, in accordance with the PEIR mitigation ratios identified in Table 4.3.10, would be: 2.52 acres for freshwater marsh (4:1 ratio, composed of 1:1 wetland restoration and 3:1 wetland enhancement); 0.06 acre for open water (2:1 ratio in the form of out-of-kind mitigation as a vegetated habitat type with higher biological value); and 1.35 acres for southern willow scrub (3:1 ratio, composed of 1:1 wetland restoration and 2:1 wetland enhancement). Mitigation for wetland impacts is at the Stadium Mitigation site in the San Diego River.
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	Compensation for wetland impacts is proposed to occur at the Stadium Mitigation site in the San Diego River (See Appendix H). This site is located just south of Qualcomm Stadium along and within the San Diego River. This wetland mitigation plan has been prepared consistent with the PEIR's BTR Conceptual Mitigation Plan (Appendix H) 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)	NA	As identified in Appendix B – IBA, approximately 0.68 acre of developed land would be impacted by the proposed maintenance. No mitigation is identified in PEIR Table 4.3-11 for developed land; therefore, no upland impacts need to be compensated by payment into the City's Habitat Acquisition Fund.

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 (cont.)			
Biological Resources (cont.)			
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 coastal California gnatcatcher (CAGN) habitat (i.e., Coastal Sage Scrub) is identified or mapped within the maintenance area. See Appendix B – IBA. Thus, maintenance would not impact habitat for this species and mitigation is not required.
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) 	Y	Pursuant to the mitigation included in the IBA (Appendix B, pages 20 and 21), pre-maintenance surveys would be conducted if maintenance activities occur during the breeding season of LBV, raptors and other birds protected by the Migratory Bird Treaty Act. If active nests are found, setbacks identified in the IBA would be respected as long as the nests are active (see Appendix B, pages 21). Pre-construction clearance surveys will be performed in the maintenance area to insure that LBV is not present inside the maintenance area at the start of maintenance. Flagging will be placed at the west end of the maintenance within LR2A to keep equipment from entering adjacent habitat (Appendix B, page 21).
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	Impacts to biological resources within the disturbance area of the proposed Stadium Mitigation Site have been analyzed and appropriate mitigation measures defined (refer to Appendix H).
17	Does the IBA discuss appropriate actions to offset impacts to listed or endemic sensitive plant species? (Mitigation Measure 4.3.15)	NA	No endemic sensitive plants species would be impacted by maintenance (See Appendix B – IBA).
18	Would maintenance activities meet setback requirements for sensitive species? (Mitigation Measure 4.3.16)	Y	If maintenance is planned during the raptor nesting season, pre-maintenance surveys would be conducted and maintenance setback buffers established around active nests in accordance with the mitigation included in the IBA.

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 (cont.)			
Biological Resources (cont.)			
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	The federal/state listed endangered least Bell's vireo has been observed 250 feet west of the western tip of the LR 2A maintenance area. Suitable nesting habitat for least Bell's vireo exists immediately west of the LR 2A maintenance area, and vireo has potential to use the LR 2A maintenance area for foraging. Pages 20 and 21 of the IBA include mitigation measures to avoid direct impacts and noise impacts to least Bell's vireo. Notes 15 and 16 under Applicable PEIR Mitigation Measures on Sheet 8 of the IMP for Lower Alvarado include measures to avoid impacts to least Bell's vireo.
20	Has evidence been submitted to document that protocol surveys have been conducted for potentially occurring sensitive bird species? (Mitigation Measure 4.3.18)	Y	Protocol surveys for the least Bell's vireo are currently in progress. A letter summarizing the results and conclusions of the survey will be submitted to DSD upon completion.
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)	NA	As indicated in response No. 20 protocol surveys are in process.
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	The project does not propose removal of any eucalyptus or other trees in the maintenance area that could be used by raptors.
23	Would maintenance activities occur at known localities for listed fish species? If yes, would maintenance include appropriate mitigation? (Mitigation Measure 4.3.23)	NA	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?	N	Listed/narrow endemic plants are not present in segments proposed for maintenance.

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 (cont.)			
Biological Resources (cont.)			
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	The City will attempt to avoid maintenance during the breeding season of sensitive birds. However, if the season cannot be avoided due to the need to conduct maintenance activities in time to protect human life and safety, the IBA, INA and IMP require specific measures to protect sensitive wildlife from adverse impacts related to maintenance including setbacks from active nests and noise attenuation barriers (see Mitigation section of Appendix E – INA, Note 3 under Additional Maintenance Requirements on Sheet 6 of the IMP for Upper Alvarado and Sheet 7 of the IMP for Lower Alvarado, and pages 20 and 21 of Appendix B – IBA).
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	A qualified archaeologist has determined that the project occurs in an area of moderate cultural sensitivity, and has prepared an IHA (Appendix C) to document resource potential.
27	Has an Individual Historical Assessment (IHA) been prepared for the proposed maintenance? (Mitigation Measure 4.4.1)	Y	An IHA has been prepared in compliance with the City of San Diego Historical Resources Guidelines and MMP (see Appendix C). As stated on page 10 of the IHA, no cultural resources were identified within the maintenance area. Given the fact that the maintenance has occurred in the past within this channel, the potential for encountering buried cultural resources is considered low in UR2. There is a moderate potential for archaeological resources adjacent to LR2A, LR2B, and LR4. However, no historic resources are expected because of disturbance associated with past maintenance activities.
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	An intensive field survey was completed by qualified archaeological consultants, which included archaeologists from Affinis and a Native American Monitor from Red Tail Monitoring and Research. The results of the survey are included in the IHA in Appendix C.
29	Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1)	Y	A full records search was conducted from the SCIC in January 2015, for a nearby project that encompassed the areas of the Upper and Lower Alvarado Creek channels. See Appendix C – IHA.

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 (cont.)			
Historical Resources (cont.)			
30	Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1)	NA	As stated on page 10 of the IHA, no cultural resources were identified within the maintenance area. Since MM 4.4.1 states 'the archaeologist shall conduct an archaeological testing program for any identified historical resources,' and since no historic resources have been identified, testing is not required.
31	Have significant historical resources been identified within the proposed maintenance activity APE? If yes, address criteria numbers 32 through 38. If no, proceed to criteria number 39 (Mitigation Measures 4.4.1 and 4.4.2)	N	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)	NA	NA
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	NA
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	NA
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	NA
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	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)	NA	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)	Y	The IHA concludes that there is a moderate potential for cultural resources in the Lower Alvarado Creek. However, as maintenance will occur in concrete-lined channel or will occur in earthen portions which have already been disturbed by past maintenance , monitoring is not required.

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 (cont.)			
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	The MHPA boundary is shown on Appendix A - IMP, Sheet 2 for Lower Alvarado Creek Channels, and Sheet 2 for Upper Alvarado Creek Channel.
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	As indicated in the IBA, MHPA adjacent to UR2 has low potential to support coastal California gnatcatcher and surveys of that area are not necessary. MHPA near LR2A has high potential to support least Bell's vireo, and surveys will be conducted prior to maintenance, as required by the IBA and Note 16 of the applicable PEIR Measures section of the IMP. Based on the analysis performed for the IBA, no other listed species have the potential to occur within or near the maintenance area.
41	Has a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) performed a noise analysis for the proposed maintenance activity? (Mitigation Measure 4.1.3)	Y	The noise analysis was performed by Charles Terry, Senior Acoustical Consultant for HELIX Environmental Planning, Inc. Mr. Terry has over 30 years of experience evaluating noise. He has prepared and conducted noise planning and monitoring studies for clients with construction and facilities noise including submittals to various government agencies for human and endangered species noise impacts. He is also on the County of San Diego's certified list of acoustical studies.
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)	Y	The IBA concludes that maintenance activities could impact the least Bell's vireo as well as raptors and other MBTA birds. Maintenance is restricted to outside the breeding season unless necessary to protect life and property (see Response Nos. 19 and 25, above). As indicated in response to No. 15, mitigation measures would be implemented during the breeding season to protect sensitive birds from significant impacts.

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 (cont.)			
Land Use (cont.)			
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	As indicated in response to No. 15, mitigation measures would be implemented during the breeding season to protect sensitive birds from significant impacts.
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	A pre-maintenance meeting will be scheduled in coordination with MMC prior to initiating project activities. A biological monitor will be required and included in the pre-maintenance meeting. See response to No. 2 for more information.
45	Does the IMP include appropriate maintenance designs? (Mitigation Measure 4.1.7)	Y	Notes under Applicable PEIR Mitigation Measures on Sheet 7 of the IMP for Upper Alvarado and Sheet 8 of the IMP for Lower Alvarado include the design measures specified by Mitigation Measure 4.1.7. In addition, Note 2 of the Additional Maintenance Requirements section of the IMP on Sheet 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, contains provisions to preclude introduction of invasive plants. Notes 6 through 12 and 14 and 15 under MMP Protocol Requirements in the IMP on Sheet 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, will control trash and maintenance equipment servicing byproducts. In addition, the IMP limits maintenance access and staging to disturbed 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)	NA	As indicated in response to No. 14, no suitable habitat for coastal California gnatcatcher will be impacted by the proposed maintenance. MHPA lands adjacent to UR2 have a low potential to support gnatcatcher due to disturbance by non-native species, and low native shrub cover.
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	Access roads will not need to be stabilized as all roadways used are paved.

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 Protocols (cont.)			
Water Quality (cont.)			
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	Erosion and sediment controls such as street sweeping/vacuumping and sandbag barriers will be implemented to prevent off-site sediment transport during maintenance. See Appendix A – IMP, Sheets 3-6 (Upper Alvarado) and Sheets 4 through 6 (Lower Alvarado), and Appendix G - WPCP for more information. A check dam will be installed at the lower end of UR2 to control erosion. Temporary erosion and sediment control measures will be removed upon completion. The check dam will be removed once the vegetation within the channel has re-established (see IMP – Note 7, Sheet 5 (Upper Alvarado) and Note 7, Sheet 6 (Lower Alvarado)).
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	Note 12 under Master Maintenance Protocol Requirements on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, includes this requirement.
50	Does the IMP require training for personnel responsible for the proper installation, inspection, and maintenance of on-site BMPs. (WQ-4)	Y	Note 13 under Master Maintenance Protocol Requirements on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, includes this requirement.
51	Does the IMP require revegetation of spoil and staging areas within 30 days of completion of maintenance activities? Does it require monitoring and maintenance of revegetated areas for a period of not less than 25 months following planting? (WQ-5)	NA	As access and staging would occur on paved areas, no revegetation would be required.
52	Does the IMP require sampling and analysis; monitoring and reporting; and post-maintenance management programs per National Pollutant Discharge Elimination System (NPDES) and/or City requirements? (WQ-6)	NA	The project is not subject to NPDES requirements because the NPDES General Construction Permit excludes projects that consist of “routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility” activities (for more information, see Appendix G – WPCP, page 2). However, Note 13 under Maintenance BMPs on Sheet 6 of the Lower Alvarado Creek IMP and on Sheet 5 of the Upper Alvarado Creek IMP includes this requirement pursuant to City requirements.
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	Note 14 under Master Maintenance Protocol Requirements on Sheet 6 of the IMP for Upper Alvarado and Note 15 on Sheet 7 of the Lower Alvarado IMP include this requirement.

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)
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	Note 15 under Master Maintenance Protocol Requirements on Sheets 6 of the Upper Alvarado IMP and Note 16 on Sheet 7 of the Lower Alvarado IMP include this requirement.
Master Program Protocols (cont.)			
Water Quality (cont.)			
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	<p>In the Lower Alvarado Channel current condition and vegetation-removed condition, velocities are not erosive and do not exceed permissible velocities; therefore, additional velocity decreasing measures such as check dams are not required. See Appendix D – Lower Alvarado IHHA, page 10 for more information.</p> <p>In the Upper Alvarado Channel, velocities would exceed permissible limits; therefore, maintenance segments anticipated to generate localized velocity increases following maintenance will include placement of a temporary check dam to reduce storm water velocities and aid in the re-establishment of vegetation in the channel to reduce the potential for sediment generation within the site. As discussed earlier, the fence will be removed once vegetation is reestablished. See Appendix D – Upper Alvarado IHHA, page 10 for more information.</p>
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	Note 17 under MMP Protocol Requirements on Sheet 7 of the Lower Alvarado IMP and Note 16 on Sheet 6 of the Upper Alvarado IMP requires inspection of earthen-bottom storm water facilities within 30 days of the first 2-year storm following maintenance and implementation of appropriate remedial erosion control measures.
57	Does the IMP incorporate mitigation measures identified in the IWQA and/or Table 4.8-8 of the PEIR?	Y	<p>Maintenance BMPs are identified on Sheet 5 (Upper Alvarado) and Sheet 6 (Lower Alvarado) of the respective IMPs.</p> <p>In addition, the City will continue to implement general water quality improvement activities, as required. The City will utilize a suite of pollution prevention, source control, and treatment BMPs to address sediment and other pollutant inputs.</p>

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 Protocols (cont.)			
Biological Resource Protection			
58	Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1)	Y	Note 1 under Master Maintenance Protocol Requirements on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, requires all vehicles to remain in the access areas designated on the maps.
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 Master Maintenance Protocol Requirements on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, requires flagging of all sensitive biological resources to remain 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	Note 3 under Master Maintenance Protocol Requirements on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, requires a pre-maintenance meeting.
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	Note 4 under Master Maintenance Protocol Requirements included on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, identify erosion control measures to be implemented during maintenance.
62	Does the IMP require conducting pre-Master Maintenance Protocol surveys if maintenance is proposed during the breeding season of a sensitive animal species? (BIO-5)	Y	See Note 5 under Master Maintenance Protocol Requirements included on Appendix A - IMP, Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively.
63	If arundo will be removed during maintenance, does the IMP include appropriate removal methods to minimize downstream dispersal? (BIO-6)	Y	Note 6 under Master Maintenance Protocol Requirements included on Sheet 7 of the IMPs for Lower Alvarado includes protocols for removal of arundo.
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 6 under Applicable PEIR Mitigation Measures on Sheets 7 and 8 of the IMPs for Upper and Lower Alvarado, respectively, includes this requirement.
65	Does the IMP include measures to minimize the potential for entrapping wildlife when implementing erosion control measures? (BIO-8).	Y	Note 4 under Additional Maintenance Requirements on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, includes this requirement.

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 Protocols (cont.)			
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 is required because no known cultural resources occur in 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)	Y	Note 3 under Master Maintenance Protocol Requirements included on Sheets 6 and 7 of the IMPs for Upper and Lower Alvarado, respectively, includes this requirement.
Waste Management			
68	Does the IMP call for disposal of compostable green waste material at an approved composting facility, if available? (WM-1)	Y	Note 7 under Master Maintenance Protocol Requirements included on Sheet 6 of the IMP for Upper Alvarado meets this requirement. Note 8 under Master Maintenance Protocol Requirements included on Sheet 7 of the IMPs for Lower Alvarado meets this requirement.
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	Note 8 under Master Maintenance Protocol Requirements included on Sheet 6 of the IMP for Upper Alvarado meets this requirement. Note 9 under Master Maintenance Protocol Requirements included on Sheet 7 of the IMPs for Lower Alvarado meets this requirement.
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	Note 9 under Master Maintenance Protocol Requirements included on Sheet 6 of the IMP for Upper Alvarado meets this requirement. Note 10 under Master Maintenance Protocol Requirements included on Sheet 7 of the IMPs for Lower Alvarado meets this requirement.
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	Note 10 under Master Maintenance Protocol Requirements included on Sheet 6 of the IMP for Upper Alvarado meets this requirement. Note 11 under Master Maintenance Protocol Requirements included on Sheet 7 of the IMPs for Lower Alvarado meets this requirement.