

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 25, 2018

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ACTIVITY INFORMATION

Master Program Map #(s): 64a

City Equipment #(s): 88038168

Creek Name: Reservoir Drive Channel

Watershed(s): San Diego River

Location: North of Reservoir Lane and south of Alvarado Road in the College Area

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"/> | Maintenance Methodology Table (MMT) – Appendix A |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | Maintenance Activity Report (MAR) – Appendix G |

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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 | Mitigation measures for noise, historical resources, and paleontological resources, and water quality were not required. As a concrete-lined channel, no historical or paleontological resources occurred within the channel. Thus, no mitigation was required. Based on the conclusion of the biologist that prepared the IBA, no sensitive birds occurred within 750 feet of the maintenance activity. Therefore, no noise controls were required. No land use impacts occurred which required mitigation. However, mitigation is required for the impacts to wetlands related to maintenance. As described in Appendix B, Individual Biological Assessment (IBA), compensation will occur at a ratio of 4:1 for impacts to freshwater marsh, and 0:1 for impacts to disturbed wetland consisting of non-native species. |
| 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) | N | A pre-maintenance meeting was not conducted due to the emergency nature of the project. |

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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 | No approvals from Responsible Agencies were required to carry out the emergency maintenance. Although the U.S. Army Corps of Engineers (USACE), San Diego Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW) traditionally have jurisdiction over wetlands within storm water channels, consultation with each of these agencies confirmed that they did not require permits for the Reservoir Drive channel maintenance because of the work was determined to be an exempt activity. Emails from the USACE and RWQCB dated November 26, 2014 state that the activity is exempt and that the proposed removal of vegetation from the concrete channel is not a discharge of waste. Therefore, a permit pursuant to sections 401 and 404 of the Clean Water Act and a Waste Discharge Requirements, or a Waiver thereof, from RWQCB and USACE are not required. The City provided notification of emergency work under CDFW's Lake and Streambed Notification Program on December 9, 2014. As the project is located outside the Coastal Zone, approval from the California Coastal Commission (CCC) was not required. |
| 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 December 9, 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 | Due to the emergency nature of the project an IBA was developed post-project by a qualified biologist in accordance with the MMP (see Appendix B). |
| 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, a formal IMP was not developed prior to work being conducted. An IBA is included as Appendix B. |

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| 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. |
| 8 | Has a mitigation account been established to provide sufficient funds to implement all biological mitigation associated with the proposed maintenance act? (Mitigation Measure 4.3.4) | Y | The mitigation associated with this project will be funded by the T&SWD's annual budget. A Departmental Internal Order (I/O) number/account has been set up to track mitigation costs and 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) | NA | As indicated in response to No. 3, 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. See Attachment 6. |
| 10 | Does the IMP call for a pre-maintenance meeting, if identified in the associated IBA? (Mitigation Measure 4.3.6) | N | As indicated in response to No. 2, a pre-maintenance meeting was not feasible given the emergency nature of the 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 | The proposed maintenance will temporarily impact 0.083 acre of wetland habitat, consisting of 0.071 acre of freshwater marsh (including disturbed) and 0.12 acre of disturbed wetland composed of invasive exotic species. Compensation for these impacts will be at a ratio of 4:1 for impacts to freshwater marsh (including disturbed), and 0:1 for disturbed wetland composed of invasive exotic species. These ratios are in accordance with the SDP for the program. |
| 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 | Compensatory mitigation for wetland impacts is proposed at the Stadium Mitigation Site in the San Diego River constructed by the Public Utilities Department. |
| 13 | Would upland impacts be compensated through payment into the City's Habitat Acquisition Fund, or through acquisition and/or preservation of land in accordance with the ratios and requirements identified in Table 4.3-11? (Mitigation Measure 4.3.11) | NA | No sensitive upland vegetation was impacted. Therefore, no compensation was required. (See Appendix B). |

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| 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) occurred within the maintenance area. Temporary noise impacts to nearby coastal sage scrub habitat occurred for 1 day outside of the avian breeding season (See Appendix B). Thus, no mitigation was 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) | NA | No monitoring was required. No sensitive birds occurred within 750 feet of the maintenance. Therefore, noise attenuation was not required. No vegetation within the channel could be retained due to the narrow dimension, concrete lining and slope of the channel. Furthermore, no sensitive vegetation was disturbed for access to the channel. Thus, there was no need to flag or otherwise delineate sensitive biological resources to be avoided during maintenance. As the maintenance occurred outside the raptor breeding season, no pre-maintenance surveys were required. |
| Master Program PEIR Mitigation, Monitoring, and Reporting Program | | | |
| Biological Resources (cont.) | | | |
| 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 | Notice of exemption for the Stadium Wetland Mitigation Project filed on October 23, 2014. Categorical Exemption 1530-4 (d); all mitigation work at the Stadium Wetland Mitigation site occurs within City MHPA, but would not result in direct impacts to sensitive resources requiring mitigation. |
| 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). |
| 18 | Would maintenance activities meet setback requirements for sensitive species? (Mitigation Measure 4.3.16) | NA | See response to No. 15, above. |
| 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) | NA | The maintenance was completed outside the designated bird breeding season. Thus, protocol surveys were not 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 | As the maintenance was completed outside the designated bird breeding season, protocol surveys were not required. |

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| 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 | 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. |
| 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) | 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? | N | Listed/narrow endemic plants are not present in segments that required emergency maintenance. |
| Master Program PEIR Mitigation, Monitoring, and Reporting Program | | | |
| 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) | 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 | Due to the emergency nature of the work, the Individual Historical Assessment (IHA) was developed post-project by a qualified archaeologist (Appendix C). The IHA concludes that no historical resources were impacted since the channel is lined with concrete. |
| 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). |
| 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 | No field survey was required due to the fact that the channel is concrete-lined. |

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| 29 | Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1) | NA | No record search was required because no impacts to historical resources occurred as a result of the maintenance. The channel is an engineered, concrete-lined drainage channel accessed from an existing paved street; there was no disturbance to naturally-occurring soil surface associated with the project. Furthermore, due to the emergency nature of the work, a records search could not be conducted pre-project. |
| 30 | Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1) | NA | In the absence of potential impacts to historical resources, no testing was required. |
| 31 | Have significant historical resources been identified within the proposed maintenance activity APE? If yes, address criteria numbers 32 through 38. If no, proceed to criteria number 39 (Mitigation Measures 4.4.1 and 4.4.2) | N | As indicated in the IHA, no significant historical resources occurred within the maintenance area. |
| 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 | As indicated in the IHA, 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 | As indicated in the IHA, no significant impacts occurred as a result of the maintenance. |
| 35 | Has a pre-maintenance meeting been planned and/or conducted on site, including representatives from the PI, Native American consultant, SWD, MMC, Resident Engineer (RE), and MC? (Mitigation Measure 4.4.2.4) | NA | In the absence of a requirement for mitigation, a pre-maintenance meeting was not required. |
| 36 | If human remains have been discovered in the course of conducting the ARDDRP, would the procedures set forth in the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) be implemented? (Mitigation Measure 4.4.2.5) | NA | No human remains were encountered during the maintenance operation. |
| 37 | Will the PI and Archaeologist assume required responsibilities? (Mitigation Measures 4.4.2.6, 4.4.2.7, and 4.4.2.8) | NA | In the absence of a requirement for mitigation, a PI or Archaeologist 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 | As indicated in the IHA, no historical resources were impacted by the maintenance and no mitigation was required. |

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| Master Program PEIR Mitigation, Monitoring, and Reporting Program | | | |
| Land Use | | | |
| 39 | Has the Assistant Deputy Director (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 boundaries of the adjacent MHPA are noted on Figure 3 of the IBA included as Appendix B. As indicated in this graphic, the westerly portion of an MHPA lies approximately 40 feet from the southerly portion of the 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 | 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 noise analysis was required as no sensitive species were observed or detected within 750 feet of the maintenance area. (See Appendix B) |
| Master Program PEIR Mitigation, Monitoring, and Reporting Program | | | |
| Land Use (cont.) | | | |
| 42 | Would the proposed maintenance have the potential to impact breeding activities of listed species? If yes, would maintenance activities be restricted to outside the breeding season? (Mitigation Measure 4.1.4) | N | As 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. |
| 43 | If maintenance cannot be avoided during an identified breeding season for a listed bird which is determined to be potentially significantly affected by maintenance, would the appropriate measures be taken? (Mitigation Measure 4.1.5) | NA | As 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 | As indicated in response to No. 2, a pre-maintenance meeting was not feasible given the emergency nature of the work. |

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| Master Program PEIR Mitigation, Monitoring, and Reporting Program | | | |
| Land Use (cont.) | | | |
| 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 vactor 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. |
| 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 did not need to be stabilized as all roadways used were paved. As no ground disturbance was performed, no erosion control was necessary. |
| 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) | NA | Per the Maintenance Methodology Table, the City placed a vactor 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. |

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| Master Program Protocols (cont.) | | | |
| Water Quality (cont.) | | | |
| 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 maintenance equipment operated from Reservoir Drive, no areas were disturbed which require revegetation. |
| 52 | Does the IMP require sampling and analysis; monitoring and reporting; and post-maintenance management programs per National Pollutant Discharge Elimination System (NPDES) and/or City requirements? (WQ-6) | NA | The project is not subject to NPDES requirements because the NPDES General Construction Permit excludes projects that consist of "routine maintenance to maintain original line and grade, hydraulic capacity, or original purpose of the facility" activities. |
| 53 | Does the IMP prohibit storing hazardous materials used during maintenance within 50 feet from storm water facilities? Does it require hazardous materials to be managed and stored in accordance with applicable local, state and federal regulations? (WQ-7) | NA | 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 | No check dam or other mechanism was installed or needed during the emergency maintenance. |
| 56 | Does the IMP require inspection of earthen-bottom storm water facilities within 30 days of the first 2-year storm following maintenance? Are erosion control measures recommended by the field engineer incorporated into the IMP? (WQ-10) | NA | The Reservoir Drive channel is concrete-lined; therefore, inspections are not required. |

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| Master Program Protocols (cont.) | | | |
| Water Quality (cont.) | | | |
| 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 vacor 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. |
| Biological Resource Protection | | | |
| 58 | Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1) | NA | The project adhered to the Maintenance Method 3.3. Under the IMP Maintenance Methodology Table MMP - Protocol Required all access & loading run the entire length of the channel along Reservoir Drive. 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 | As discussed in response to No. 15, delineation of sensitive biological resources was not required. |
| 60 | Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3) | NA | As indicated in response to No. 2, a pre-maintenance meeting was not feasible given the emergency nature of the work. |
| 61 | Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4) | NA | No erosion control was required as part of the maintenance work. |
| 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 | The emergency maintenance did not occur during the breeding season of a sensitive animal 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 during maintenance. Thus, no specific controls were required. |
| 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 | As maintenance occurred outside of the breeding season for sensitive birds, including raptors, setbacks from nests were not required. |

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| 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. |
| 67 | Does the IMP require a pre-maintenance meeting on-site when maintenance activities are determined in the IHA to potentially impact historic resources? (HIST-2) | NA | As indicated in response to No. 2, a pre-maintenance meeting was not feasible given the emergency nature of the work. Nor was it required given the fact that no significant historical resources were anticipated to occur within the concrete-lined channel. |
| Waste Management | | | |
| 68 | Does the IMP call for disposal of compostable green waste material at an approved composting facility, if available? (WM-1) | NA | No material suitable for composting was removed during maintenance. |
| 69 | Does the IMP call for screening of soil, sand, and silt to remove waste debris and, wherever possible, to be re-used as fill material, aggregate, or other raw material? (WM-2) | NA | No material suitable for reuse was removed during maintenance. |
| 70 | Does the IMP call for separation and transport of waste tires to an appropriate disposal facility, including the completion of a Comprehensive Trip Log (CTL) if more than nine tires are in a vehicle or waste bin at any one time? (WM-3) | NA | No tires were removed during maintenance. |
| 71 | Does the IMP require hazardous materials encountered during maintenance to be logged under a hazardous materials manifest and transported to an approved hazardous waste storage, recycling, treatment or disposal facility? (WM-4) | NA | No hazardous materials were encountered during maintenance. |