

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.

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ACTIVITY INFORMATION

Master Program Map #(s): 126 and 127

City Equipment #(s): 88025735, 88026463, 88038160

Creek Name: Siempre Viva and Bristow Storm Water Detention Facility

Watershed(s): Tijuana

Location: The Siempre Viva and Bristow Storm Water Detention Facility is located in the Otay Mesa Community in the City of San Diego between Britannia Boulevard and Otay Pacific Road.

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 type="checkbox"/> | <input checked="" type="checkbox"/> | Habitat Mitigation and Monitoring Plan (HMMP) – Appendix H |

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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	<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 • 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 3 under Master Maintenance Program (MMP) Protocol Requirements, (Sheet 4 of the IMP), a pre-maintenance meeting will be scheduled in coordination with MMC prior to initiating project activities. A qualified biologist, field engineer, planner, equipment operators, and other key personnel will be required and included in the pre-maintenance meeting. Because the likelihood to discover cultural and paleontological resources is considered low, a historical or paleontological monitor is not required.</p>

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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 (cont.)			
General Mitigation			
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)	NA	<p>As discussed in the IBA, permits are not required from the United States Army Corps of Engineers (USACE) per e-mail from Winston Zack dated November 15, 2017, because the only time water would connect downstream to an established jurisdictional feature is from larger storm events. Due to the infrequency of such storm events and lack of non-wetland waters ordinary high water mark (OHWM) features, there is little or no conveyance of flow.</p> <p>Permits from the California Department of Fish and Wildlife (CDFW) are not required as the feature in question is not a river, stream, or lake and is not subject to the Notification requirements in Section 1602 of the Fish and Game Code, per an email from Kelly Fisher on October 24, 2017.</p> <p>The Regional Water Quality Control Board (RWQCB) determined the detention facility to be a BMP and not subject to regulation under the RWQCB's dredge and fill program, per emails from Lisa Homna on November 16 and 27, 2017.</p> <p>Because the Siempre Viva and Bristow water detention facility was constructed as a storm water BMP within an area that did not support historical wetlands or drainages, and the water resource agencies have agreed that the storm water detention facility is not a jurisdictional resource (see Agency Jurisdiction section of the IBA), wetland vegetation communities that have developed within the storm water detention facility are considered artificially-created communities. Therefore, project disturbance would not be regulated by the Environmentally Sensitive Lands Ordinance of the City Municipal Code and the City's Biology Guidelines.</p>
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)	NA	A Notification of Lake or Streambed Alteration to CDFW would be required for maintenance resulting in the alteration or modification of a streambed, substantial diversion or obstruction of natural flows, or destruction of riparian habitat. Per an email from Kelly Fisher on October 24, 2017, the feature in question is not a river, stream, or lake and is not subject to the Notification requirements in Section 1602 of the Fish and Game Code.

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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 (cont.)			
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.
8	Has a mitigation account been established to provide sufficient funds to implement all biological mitigation associated with the proposed maintenance act? (Mitigation Measure 4.3.4)	N	Because the disturbed wetlands impacted by the project are artificially-created wetland communities (see response to No. 3), because the only time water would connect downstream to an established jurisdictional feature is from larger storm events, and therefore the detention facility is not considered jurisdictional to the USACE and CDFW and is not considered Environmentally Sensitive Lands by the City, no mitigation is required for proposed impacts.
9	Has evidence been provided documenting approval of the proposed maintenance by permitting authorities? (Mitigation Measure 4.3.5)	NA	As described in response to No. 3, permits are not required from USACE, CDFW, or RWQCB.
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)	NA	As discussed in response to No. 3, no City jurisdictional wetlands would be impacted. Thus, mitigation is not required.
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)	NA	As discussed in response to No. 11, the proposed maintenance would not impact City, USACE, or CDFW jurisdictional wetlands; therefore, wetland mitigation plans and enhancement and/or restoration would not be required.

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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 (cont.)			
Biological Resources (cont.)			
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	All upland habitat within the project area consists of developed habitat, disturbed land, and ornamental plantings, which do not require mitigation.
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	Coastal California gnatcatchers (CAGNs) were not identified as a listed animal species with a moderate to high potential to be impacted in Appendix B. Thus, maintenance would not impact 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 measures included in the IBA (Appendix B, page 9), pre-maintenance surveys would be conducted if maintenance activities occur during the breeding season of state or federally listed birds, 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.
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)	NA	See response to No. 3. No off-site mitigation is required.
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)	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.

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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)	N	No sensitive species have been reported within the work areas during previous surveys; therefore, the potential for state and federally listed, and other sensitive species to occur within the work area is considered very low (see Appendix B).
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 described in Appendix B, biological surveys were conducted for the proposed maintenance. No sensitive bird species were identified, no suitable habitat was identified, and no further 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)	N	See response to No. 19 regarding sensitive bird species.
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)	Y	There is potential for removal of eucalyptus trees or other trees used by raptors for nesting. Appropriate setbacks and limitations in accordance with Mitigation Measure 4.3.22 would be implemented.
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.
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 IBA and IMP require specific measures to protect sensitive wildlife from adverse impacts related to maintenance including setbacks from active nests (see Notes 5 and 7 under MMP Protocol Requirements on Sheet 4 of the IMP, and pages 13 and 14 of Appendix B – IBA). If maintenance is conducted during the nesting season, these measures would be followed.

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Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
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 prepared an IHA (Appendix C) to document resource potential in the maintenance area. The IHA determined that the project does not occur in an area of moderate or high cultural sensitivity.
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 5 of the IHA, no cultural resources were identified within the maintenance area. No historic resources are expected because the maintenance area is occurring in areas that exhibit a great deal of disturbance from past detention facility construction and maintenance and commercial development.
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 HELIX Environmental Planning, Inc. 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 March 2017 for the detention facility. See Appendix C.
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 5 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

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Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Historical Resources (cont.)			
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)	NA	The cultural resources sensitivity of Maps 126 and 127 is identified as “moderate” in the MMP Historical Resources Report because the detention facility is located within a previously recorded archaeological site CA-SDI-7208. However, the archaeology site has been evaluated for significance several times in the past and, in all cases, has been determined not to be a significant cultural resource. Thus, the IHA concludes that monitoring is not required.
Land Use			
39	Has the ADD Environmental Designee verified that all MHPA boundaries and limits of work have been delineated on all maintenance documents? (Mitigation Measure 4.1.1)	NA	The MHPA is located approximately 3,180 feet east and 2,700 feet west of maintenance area (Figure 5 of Appendix B). Due to this distance from the maintenance area, maintenance work would not extend into the MHPA and it is not included on the IMP sheets.
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 and response to No. 39, the MHPA is located 3,180 feet east and 2,700 feet west of the maintenance area. Furthermore, the IBA concludes that no habitat for sensitive species occurs within 750 feet of the proposed maintenance.
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	According to Mitigation Measure 4.1.3, a noise analysis is required if a listed species is located within 500 feet of a proposed maintenance activity. As identified in Appendix B, listed species were not identified during the protocol survey. An Individual Noise Assessment (INA) is included as Appendix F.
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)	NA	The IBA concludes that maintenance activities would not impact listed species (see response to No. 19).

SUBSTANTIAL CONFORMANCE REVIEW CHECKLIST MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM

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)	NA	As indicated in response to No. 19, no listed birds are expected to occur in the maintenance area. .
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 MMP Protocol Requirements on Sheet 4 of the IMP include the design measures specified by Mitigation Measure 4.1.7. Notes 8 through 17 under MMP Protocol Requirements will control trash and maintenance equipment servicing byproducts. In addition, Note 4 of the MMP Protocol Requirements section of the IMP on Sheet 6 contains provisions to preclude introduction of invasive plants. The IMP also 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. In addition, as indicated in response to No. 39, the maintenance areas will not be adjacent to or within an MHPA boundary.
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 and staging areas do not need to be stabilized as all roadways used for these activities are paved. Notes 12, 13, 14, and 17 of MMP Protocol Requirements on Sheet 4 of the IMP describes measures to prevent off-site sediment transport, such as berms.
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 and vacuuming and sandbag barriers will be implemented to prevent off-site sediment transport during maintenance. See Appendix A – IMP, Sheets 3-4 and Appendix G for more information.
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 13 under MMP Protocol Requirements on Sheet 4 of the IMP includes this requirement.

SUBSTANTIAL CONFORMANCE REVIEW CHECKLIST MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM

Master Program Protocols (cont.)			
Water Quality (cont.)			
50	Does the IMP require training for personnel responsible for the proper installation, inspection, and maintenance of on-site BMPs. (WQ-4)	Y	Note 14 under MMP Protocol Requirements on Sheet 4 of the IMP 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)	Y	Note 17 under Maintenance BMPs on Sheet 5 of the IMP includes this requirement.
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 3 of the 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 15 under MMP Protocol Requirements on Sheet 4 of the IMP includes this requirement.
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 16 under MMP Protocol Requirements on Sheet 4 of the IMP includes this requirement.
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 IHHA (Appendix D) determined that, based on the non-erosive velocities and the limited capacity of the detention facility, check dams were not necessary to reduce velocities.
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 4 of the 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	Maintenance BMPs are identified on Sheet 3 of the IMP. 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.

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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 MMP Protocol Requirements on Sheet 4 of the IMP requires all vehicles to remain in the access areas designated in the 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)	Y	Note 2 under MMP Protocol Requirements on Sheet 4 of the IMP requires flagging of all sensitive biological resources to remain within or adjacent to the maintenance area.
60	Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3)	Y	Note 3 under MMP Protocol Requirements on Sheet 4 of the IMP requires a pre-maintenance meeting.
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	Note 4 under MMP Protocol Requirements on Sheet 4 of the IMP identifies erosion control measures 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 MMP Protocol Requirements on Sheet 4 of the IMP.
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 MMP Protocol Requirements on Sheet 4 of the IMP 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 7 under MMP Protocol Requirements on Sheet 4 of the IMP includes this requirement.
65	Does the IMP include measures to minimize the potential for entrapping wildlife when implementing erosion control measures? (BIO-8).	NA	No erosion control measures are associated with the maintenance that would pose 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 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)	NA	As no significant historical resources were identified in the IHA, the IMP does not require a pre-maintenance meeting with a monitoring archaeologist.

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Master Program Protocols (cont.)			
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 8 under MMP Protocol Requirements on Sheet 4 of the IMP 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 9 under MMP Protocol Requirements on Sheet 4 of the IMP 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 10 under MMP Protocol Requirements on Sheet 4 of the IMP 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 11 under MMP Protocol Requirements on Sheet 4 of the IMP meets this requirement.