

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.

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ACTIVITY INFORMATION

Master Program Map #(s): 6 & 6a

City Equipment #(s): 8803901, 88032255, 88030373

Creek Name: Tripp Court Channel & Industrial Court Channel

Watershed(s): Los Peñasquitos

Location: 11689 Sorrento Valley Rd. & 3000 Industrial Ct.

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 type="checkbox"/>	<input checked="" type="checkbox"/>	Maintenance Methodology Table (MMT) – Appendix G
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Maintenance Activity Report (MAR) – 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 for noise or paleontological resources were not required. A moderate or high potential for archaeological resources existed in or adjacent to the project area. Mitigation measures included preparing an Individual Historic Assessment (IHA), and monitoring. (See Appendix C).</p> <p>Mitigation was required to compensate for maintenance impacts to biological resources, namely wetlands.</p> <p>No land use impacts occurred which required mitigation.</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	An on-site pre-maintenance meeting prior to commencing maintenance activities was conducted, as directed by the Individual Maintenance Plan (IMP). Included were a SWD maintenance manager, a maintenance contractor, and a monitoring biologist. (See Appendix A).
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	<p>This project was Emergency Maintenance and the following permits and other approvals were issued at the time of maintenance, or were pending and are now issued:</p> <ul style="list-style-type: none"> • City of San Diego Master Storm Water System Maintenance Program (MMP) was pending • Master Storm Water System Maintenance Program Environmental Impact Report (PEIR) Project No. 42891/SCH No. 2004101032 was pending • City of San Diego Emergency Coastal Development Permit Project No. 784126 • City of San Diego Notice of Exemption, Emergency Exemption to Maintain Concrete-Lined Tripp Court Channel (Map 6) and Industrial Court Channel (Map 6a) Storm Drainage Facilities • Regional Water Quality Control Board (RWQCB) 401 Water Quality Certification No. 10C-052 • Army Corps of Engineers (ACOE) Nationwide Permit 43 (Stormwater Management Facilities)

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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 (cont.)			
			<ul style="list-style-type: none"> California Department of Fish and Wildlife 1610 Emergency Streambed Alteration Agreement SAA No. 1600-2010-0193-R5
4	Is there documented evidence of compliance with Section 1602 of the State of California Fish & Game Code (e.g., copies of permits issued, letters of resolution issued by the Responsible Agency documenting compliance, or other evidence documenting compliance and deemed acceptable by the ADD Environmental Designee), as applicable? (General Mitigation Measure 4)	Y	As indicated above, the CDFW issued a SAA for the maintenance
Biological Resources			
5	Has a qualified biologist prepared an Individual Biological Assessment (IBA) for each area proposed to be maintained in accordance with the specifications included in the Master Program? (Mitigation Measure 4.3.1)	Y	An IBA was prepared by a qualified biologist in accordance with the Master Maintenance Program ([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 ADD Environmental Designee and state and federal agencies with jurisdiction over maintenance activities? (Mitigation Measure 4.3.2)	NA	The IMP and IBA was initiated in conformance with the anticipation of the MMPs acceptance (subsequently accepted July, 2013) (See Appendix B).
7	Has an IBA been prepared by a qualified biologist for each proposed maintenance activity, including the required contents? (Mitigation Measure 4.3.3)	Y	See 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 is funded by the Transportation and Storm Water Department's (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)	Y	As indicated in response to No. 3, documents showing appropriate approvals from state or federal agencies were approved to authorize the emergency maintenance.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
10	Does the IMP call for a pre-maintenance meeting, if identified in the associated IBA? (Mitigation Measure 4.3.6)	Y	The IMP called for a pre-maintenance meeting to be conducted with a monitoring biologist in attendance (See Appendix A).
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.)			
11	Does the IBA for each proposed maintenance activity identify appropriate wetland mitigation measures according to the ratios identified in Table 4.3-10? (Mitigation Measure 4.3.9)	Y	<p>The IBA identified compensation ratios for the proposed wetland impacts. (See Appendix B). It called for enhancement, restoration and/or creation at a ratio of 1:1 as stated in the IBA. The proposed maintenance was determined to temporarily impact 0.05 acre of freshwater marsh (FWM) on Map 6. Proposed maintenance will also temporarily impact 0.01 acre of FWM and 0.04 acre of southern willow scrub (SWS) on Map 6a.</p> <p>The actual mitigation impacts are currently being addressed within the El Cuervo del Sur Wetlands Establishment Project and the Los Peñasquitos Canyon Wetlands Enhancement Project (See Attachment A6 Mitigation Plans).</p>
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	Mitigation for wetland impacts is being addressed within the El Cuervo Del Sur Conceptual Wetland Enhancement Habitat Mitigation and Monitoring Plan); and the Los Peñasquitos Canyon Preserve Conceptual Wetland Enhancement Plan. (See Attachment A6). These plans are consistent with the Appendix H of the BTR contained in Appendix D.3 of the PEIR.
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).
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 Multi-Habitat Planning Area (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 or immediate vicinity (See Appendix B). Thus, no mitigation was required.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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? 	NA	No monitoring was required. No sensitive birds occurred within the maintenance area. Furthermore, the maintenance occurred in September 2010 which was outside the breeding season. Therefore, noise attenuation was not required. No vegetation within the channels could be retained due to the narrow dimension of the channel. Furthermore, no sensitive vegetation occurred adjacent to the channel. Thus, there was no need to flag
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources (cont.)			
	<ul style="list-style-type: none"> 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) 		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.
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 El Cuervo del Sur and Los Peñasquitos Canyon Preserve Mitigation Sites have been analyzed and appropriate mitigation measures defined (See Attachment A6).
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 majority of maintenance was conducted outside the designated bird breeding season. Thus, protocol surveys were not required. A pre-construction survey was conducted and a monitor was present.
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.
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 were observed or were expected to be present. Furthermore, the maintenance took place outside of the sensitive bird breeding season.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
22	Would removal of any eucalyptus trees or other trees used by raptors for nesting be proposed within the maintenance area? If yes, would maintenance include appropriate setbacks and limitations? (Mitigation Measure 4.3.22)	N	The project did not result in the 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 were no known listed fish species occurring within the project area.
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Biological Resources (cont.)			
24	Would maintenance activities occur within areas supporting listed and/or narrow endemic plants? If yes, would maintenance proceed as described in Mitigation Measure 4.3.24?	N	Listed/narrow endemic plants were not 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 Multiple Species Conservation Program (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 Individual Historical Assessment (IHA)? (Mitigation Measure 4.4.1)	Y	An IHA was prepared by a qualified archaeologist. The IHA concluded while archaeological resources would not have been anticipated in the channel, there is potential for sites on the flat areas above the channel. Therefore, there is a moderate to high potential for resources to occur in or adjacent to the impact area. (See Appendix C).
27	Has an 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 Area of Potential Effect (APE) been performed by a qualified archaeologist and a Native American monitor? (Mitigation Measure 4.4.1)	Y	A field survey was conducted by a qualified archaeologist and a Native American monitor on June 16, 2010. The entire channel area was surveyed, as was the area at the top of the channel.
29	Has a record search been requested from the South Coastal Information Center (SCIC)? (Mitigation Measure 4.4.1)	Y	Archaeologists from Affinis obtained records from the SCIC in September 2007 in conjunction with the cultural resources study for the PEIR. The records were checked again in 2010 to

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
			confirm that no additional resources were recorded in the vicinity.
30	Has an archaeological testing program been performed based on the City's Historical Resources Guidelines? (Mitigation Measure 4.4.1)	Y	The IHA report states that the PEIR Mitigation Measure 4.4.1 (monitoring) is applicable (See Appendix C).
Master Program PEIR Mitigation, Monitoring, and Reporting Program (cont.)			
Historical Resources (cont.)			
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 were found within the maintenance area (See Appendix C).
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 was 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 was required (See Appendix C).
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 (See Appendix C).
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	A pre-maintenance meeting including representatives from the PI or Native American consultant 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 was not required.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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 occurred within the maintenance and no mitigation was required (See Appendix C).
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)	NA	The maintenance project area is not located within or adjacent to a MHPA. Therefore, no MHPA boundaries were required to be delineated on any maintenance documents.
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 sighted or expected to occur within or adjacent to the maintenance. Thus, no protocol surveys were required (See Appendix B).
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 or adjacent to the maintenance area (See Appendix B). However, an Individual Noise Assessment was prepared after the maintenance activity was completed (See 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)	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 or adjacent to 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 were required.
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	An on-site pre-maintenance meeting prior to commencing maintenance activities was conducted, as directed by the IMP. Included were a SWD maintenance manager, a maintenance contractor, and a monitoring biologist.
45	Does the IMP include appropriate maintenance designs? (Mitigation Measure 4.1.7)	Y	As indicated in the IMP scope of work, maintenance included a vactor within the channel to pump any standing water to protect downstream areas.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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	The maintenance project area is not located within or adjacent to a MHPA. Therefore, no MHPA boundaries were required to be delineated on any maintenance documents.
Master Program Protocols (cont.)			
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. The IMP included water quality measures WQ 1-10 for erosion control (See Appendix A).
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	The IMP included water quality protocols for the installation of sediment controls for access paths and staging areas using measures such as silt fence, fiber rolls, gravel bags, sediment basins, and stabilized construction access points. A vector was placed within the channel to pump any standing water that may allow sediment to travel beyond the project boundary. The temporary measures were removed upon completion (See Appendix A).
49	Does the IMP require storage of Best Management Practice (BMP) materials on-site in a way that provides complete protection of exposed areas and prevent off-site sediment transport? (WQ-3)	Y	The IMP included protocol WQ-7 for the provision of on-site capacity for complete protection of exposed areas and preventing off-site sediment transport (See Appendix A).
50	Does the IMP require training for personnel responsible for the proper installation, inspection, and maintenance of on-site BMPs. (WQ-4)	Y	The IMP included protocol WQ-8 for the provision of appropriate training for personnel responsible for BMP installation and maintenance. (See Appendix A)
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	The IMP included protocol WQ-9 for the implementation of revegetation efforts should they be required due to disturbance for staging areas or access ramps (See Appendix A).
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.

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No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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	The IMP included protocol WQ-13 for storing of on-site hazardous materials at least 50 feet from storm drains and surface waters. However, according to the Maintenance Activity Report (MAR), no hazardous materials were noted in the area (See Appendix A).
Master Program Protocols (cont.)			
Water Quality (cont.)			
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	The IMP included protocol WQ-14 for storing of construction-related trash at least 50 feet from storm drains and surface waters, and for their weekly removal (See Appendix A).
55	Does the IMP require installation of any check dam or other comparable mechanism identified in the corresponding Individual Hydrologic and Hydraulic Assessment (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 channels within the maintenance areas are concrete-lined; therefore, inspections were not required.
57	Does the IMP incorporate mitigation measures identified in the Individual Water Quality Assessment (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, an after-the-fact IWQA was prepared and included in Appendix E. Although an IWQA wasn't initially prepared, measures were taken to control sediment during maintenance including gravel bags and silt fencing placed at the upstream and downstream ends of the facility to isolate the maintenance area. Portable pumps and vacuums were used to pump water from the maintenance area. Increases in downstream water-borne pollutants were not expected, and no soil was exposed to increase the potential for erosion or downstream sedimentation (See Appendix E).
Biological Resource Protection			

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58	Does the IMP restrict vehicles to access designated in the Master Program? (BIO-1)	Y	The IMP's biological protocol BIO-27 stated that vehicles were to be restricted to the approved access ramp as shown on the maintenance plan (See Appendix A).
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	The IMP's biological protocol BIO-29 stated any sensitive biological resource areas are to be flagged. However, as discussed in response to No. 15, delineation of sensitive biological resources was not required (See Appendix A).

No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
Master Program Protocols (cont.)			
Biological Resource Protection (cont.)			
60	Does the IMP require a pre-maintenance meeting when maintenance will occur within or adjacent to sensitive biological resources? (BIO-3)	Y	An on-site pre-maintenance meeting prior to commencing maintenance activities was conducted, as directed by the IMP. Included was a monitoring biologist (See Appendix A).
61	Are erosion control measures designed to avoid introduction of invasive plant species? (BIO-4)	Y	The IMP's biological protocol BIO-30 called for the avoiding of seed introduction from invasive species during erosion control measures. No invasive species were introduced during maintenance (See Appendix A).
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)	Y	The IMP included protocol BIO-32 specifying the proper method for the removal of arundo to minimize downstream dispersal (See Appendix A).
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	The IMP included protocol BIO-33 to identify raptor nests and the maintenance of a 300 foot setback. However, as maintenance occurred outside of the breeding season for sensitive birds, including raptors, setbacks from nests were not required (See Appendix A).
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			

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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 no historical resource areas were discovered in the field by the qualified archeologist as noted in the IHA (See Appendix C).
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)	N	The IHA determined that the maintenance activities could have an impact on historic resources. However, the IMP did not require a pre-maintenance meeting with a monitoring archaeologist because it was before the MMP had been adopted. An onsite pre-construction meeting was required and conducted. No historic resources were discovered during the maintenance activity (See Appendix C and Appendix A).
No.	Measure/Criteria	Y/N/NA	Basis for Determination (attach separate sheet(s) as necessary)
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	The IMP included protocol WM-35 calling for the disposal of compostable green waste at approved facilities (See Appendix A).
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	The IMP included protocol WM-36 calling for the screening of soil, sand, and silt to remove any waste debris (See Appendix A).
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	The IMP included protocol WM-37 calling for the separation and transport of waste tires if more than nine are placed in a vehicle at any one time. It also calls for a CTL to ensure that disposal is done correctly. However, according to the MAR, no more than nine tires were recovered during maintenance (See Appendix A).
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	The IMP's included protocol WM-38 calling for the appropriate removal of hazardous materials, should they be discovered. However, according the MAR, no toxic materials were encountered during maintenance (See Appendix A).