

**Mitigation Monitoring and Reporting Program (MMRP)  
For the Supplemental MND for Channel Maintenance Activities**

**PROJECT NAME:** Supplemental Mitigated Negative Declaration for Channel Maintenance Activities (SCH #2012121063)

**PROJECT DESCRIPTION:** The City owns and operates facilities associated with flood control and drainage in the City of Escondido. As the current Channel Maintenance Activities Project Regional General Permit (RGP) 94 expired in May 2020, the City is requesting the extension of the existing RGP 94 and amending this permit to add an additional 24 facility locations to the existing 63 facilities (87 total facilities), expanding a current facility location (already included in the RGP), as well as include additional work activities. Facilities requiring maintenance are located on privately owned parcels or on City easements or rights-of-way. The proposed project will establish routine maintenance activities to be performed at all facility locations to ensure adequate flood control capacity and avoid potential vector control issues. Access to the facilities is typically gained from the nearest public roadway. A Supplemental Mitigated Negative Declaration (MND) has been prepared pursuant to CEQA and provides an analysis of potential impacts from the proposed project.

**PROJECT LOCATION:** City of Escondido, CA. The project would occur at various locations throughout the City of Escondido. The facilities are located on privately owned parcels or within the City easements or rights-of-way. Access to the facilities is typically gained from the nearest public roadway.

**APPLICANT/CONTACT PERSON:** Alicia Appel, Env. Programs

**PHONE NUMBER:** (760) 839-6315

**ASSOCIATED CASE NO.:** ENV 20-0004

**APPROVAL BODY/DATE:** \_\_\_\_\_

**PROJECT MANAGER:** Elisa Marrone, Env. Programs

**MITIGATION MEASURES**

Mitigation Measure	Description	Identification No. Location in Doc.	Responsibility for Implementation	Certified Initials/Date	Comments
<b>Biological Resources</b>					
BIO-1 <b>Biological Monitors + City Inspectors</b>	The City will designate a qualified biologist(s) to oversee monitoring and compliance with protective measures for the biological resources. The qualified biologist(s) will maintain communications with the appropriate personnel (project manager, resident engineer, project foreman) to ensure that issues relating to biological resources are appropriately and lawfully managed. The qualified biologist(s) will submit reports that document compliance with these measures to the wildlife agencies upon request or, at a minimum, are included in an end-of-the-year report. In addition, the qualified biologist(s) will perform the following duties:  a. Conduct pre-activity surveys to verify site conditions and identify sensitive biological resources that	BIO-1 Page 52 of MND	City of Escondido, Biologist/Biological Monitors, Project Manager, Resident Engineer and Project Foreman		

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	<p>require avoidance. Pre-activity surveys will occur at 1) sites that have not yet been maintained; earthen sites that have not been maintained for two or more years; and concrete-lined sites that have not been maintained for three or more years; 2) sites where the maintenance activity has not occurred within 30 days from the date of the pre-activity survey; and 3) any site where maintenance work will occur within the nesting season and suitable avian habitat is present within 500 feet of the site.</p> <p>b. If site conditions are different than the established baseline, the maintenance site will be reevaluated for federally listed species and their habitats. The U.S. Army Corps of Engineers will be notified of the new conditions prior to work and will have 14 days to coordinate with the U.S. Fish and Wildlife Service to respond with amended permit conditions relevant to the site. Otherwise, work will proceed using existing avoidance, minimization, and mitigation measures set forth in the permits, as applicable to the new site conditions.</p> <p>c. Monitor O&amp;M activities when sensitive biological resources have been flagged for avoidance during pre-activity surveys by a qualified biologist(s). The qualified biologist(s) will have authority to halt work, if necessary, and will be responsible for coordinating with the U.S. Army Corps of Engineers (who will consult as needed with the U.S. Fish and Wildlife Service) to ensure the proper implementation of species and habitat protection measures. Any breach of the conservation measures will be reported to Service by the qualified biologist(s) within 24 hours of its occurrence.</p> <p>d. Erosion control measures will be regularly checked by City inspectors, resident engineer, and/or project foreman. The qualified biologist(s) will also monitor erosion control measures when he/she is on-site. Site-specific best management practice (BMP) plans will be reviewed by the qualified biologist(s) and modified, if necessary, prior to implementation. Fencing and/or erosion control measures at</p>				

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	maintenance facilities will be inspected by on-site personnel a minimum of once per week until completion of the maintenance activity.				
<b>BIO-2 Worker Awareness</b>	Each employee will participate in a training/awareness program that will be presented by the qualified biologist or City staff member, prior to working on the proposed project.	BIO-2 Page 52 of MND	Contractor		
<b>BIO-3 Staging + Stockpiling</b>	The City will ensure that all work materials, staging, storage, dispensing, fueling, and equipment maintenance activities are located in upland areas outside of sensitive habitat, and that adequate measures are taken to prevent any potential runoff from entering waters of the U.S. and State. Staging areas will be located within facility footprints or adjacent urban/developed hardscape.	BIO-3 Page 52 of MND	City of Escondido		
<b>BIO-4 Fencing and Flagging</b>	The City will temporarily fence (with silt barriers) or flag the limits of project impacts (including staging areas and access routes), as needed to prevent additional habitat impacts and prevent the spread of silt from the construction zone into adjacent habitats to be avoided. When deemed necessary, fencing or flagging will be installed in a manner that does not impact habitats to be avoided. If work occurs beyond the fenced or flagged limits of impact, all work will cease until the problem has been remedied to the satisfaction of the City. Temporary construction fencing or flagging will be removed upon project completion.	BIO-4 Page 52 of MND	City of Escondido		
<b>BIO-5 Trash Removal</b>	Spoils, trash, or any debris will be removed off-site to an approved disposal facility.	BIO-5 Page 52 of MND	Contractor		
<b>BIO-6 Dust Abatement</b>	The project foreman and biological monitor (See BIO-1 for role of biological monitor)) will periodically monitor the work area to ensure that maintenance-related activities do not generate excessive dust.	BIO-6 Page 53 of MND	Project Foreman and Biological Monitor		
<b>BIO-7 Light and Glare</b>	Maintenance activities will be conducted during normal business hours, and without the use of lighting whenever possible, excepting emergencies. If emergency maintenance activities occur at night, all project lighting (e.g., staging areas, equipment storage sites, roadway) will be directed onto the roadway or maintenance facility footprint and away from sensitive habitat. Light glare shields may also be used to reduce the extent of illumination into adjoining areas.	BIO-7 Page 53 of MND	Contractor		
<b>BIO-8 Access</b>	Vehicle traffic will be restricted to existing access roads except as specified in the RGP.	BIO-8 Page 53 of MND	Contractor		

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<p>BIO-9 <b>Post-Activity Erosion and Sediment Control</b></p>	<p>Post-maintenance activity erosion and sediment control will be implemented as applicable, including landscape planting and other biotic slope stabilization techniques (e.g., hydroseed and/or hydromulch). Erosion control blankets having plastic mesh with the potential to ensnare amphibians and reptiles will not be used in areas these animals inhabit.</p>	<p>BIO-9 Page 53 of MND</p>	<p>Contractor</p>		
<p>BIO-10 <b>Water Diversion/ Dewatering</b></p>	<p>All surface waters, including ponded waters, will be diverted away from areas undergoing dredging or vegetation removal and/or any other activity that may result in a discharge to the receiving water to the extent practicable. When water diversion is necessary, a structural BMP would be implemented to temporarily detain or reroute drainage around the work area based on field conditions, drainage characteristics, seasonal variation, maintenance duration, and practicability of application. The intent of the temporary BMP implementation would be to avoid or minimize water interference in the work area and water quality impacts to downstream receiving waters. When maintenance is completed, the flow diversion structure will be removed as soon as possible in a manner that allows flow to resume and prevent debris or sediment accumulated from returning to the stream.</p> <p>If dewatering is conducted, either a pump will move water to an upland disposal site, or a sediment basin or other structure will be used to collect and treat the water. If applicable, a National Pollutant Discharge Elimination System permit may be required. If not applicable, the water returned to the waterway should be equivalent in nature to pre-activity conditions.</p> <p>Additional water quality measures may arise as conditions of the 401 Water Quality Certification. The City will adhere to these conditions in addition to this avoidance measure.</p>	<p>BIO-10 Page 53 of MND</p>	<p>City of Escondido and Contractor</p>		
<p>BIO-11 <b>Fire Prevention</b></p>	<p>Wildfires will be prevented by exercising care when driving and by not parking vehicles where catalytic converters could ignite dry vegetation. In times of high fire hazard, trucks may need to carry water and shovels or fire extinguishers in the field. No smoking or disposal of cigarette butts will take place within vegetated areas.</p>	<p>BIO-11 Page 53 of MND</p>	<p>Contractor</p>		

Mitigation Measure	Description	Identification No. Location in Doc.	Responsibility for Implementation	Certified Initials/Date	Comments
BIO-12 <b>Minimizing Spread of Exotic Species</b>	Tools and equipment will be washed in designated areas prior to entering and exiting work areas, to ensure no plant material is transported on- or off-site.	BIO-12 Page 53 of MND	Contractor and City of Escondido		
BIO-13 <b>Riparian Vegetation Avoidance</b>	Measures will be taken to avoid and minimize impacts to native riparian vegetation to the greatest extent possible. This includes unnecessary or unauthorized trespass by workers and equipment, staging and storage of equipment and materials, refueling activities, and littering or dumping debris in riparian areas.	BIO-13 Page 53 of MND	Contractor		
BIO-14 <b>Native Tree Avoidance</b>	<p>Native Tree Avoidance – The City will only remove mature native trees within identified locations (E-60, H-19, and H-21). Outside of these identified locations, the City will not remove native trees, including, but not limited to, willow (<i>Salix</i> spp.), cottonwood (<i>Populus</i> spp.), western sycamore (<i>Platanus racemosa</i>), and oak (<i>Quercus</i> sp.). The City may trim these species up to a height of 7 feet, barring oaks and sycamores with a diameter breast-height greater than 9.5 inches, which may not be pruned.</p> <p>Where access and operation of equipment is limited, portions of trees may be trimmed/pruned to no more than 13 feet provided a certified arborist and/or project biologist determines that such pruning will not result in a significant impact to the health of the tree. Trimming/pruning of native trees will be conducted outside the general avian nesting season (February 15 through September 15), when feasible. If work is required during the avian nesting season then surveys will be required as outlined in BIO-15 through BIO-17 to ensure avoidance of nesting birds. Trimming/pruning shall be done in a manner to maintain the trees overall health and appearance. Cutting of branches greater than 2 inches in diameter will be done by a certified arborist.</p>	BIO-14 Page 53 of MND	City of Escondido		
BIO-15 <b>Nesting Season Avoidance</b>	Vegetation clearing shall occur outside of the typical breeding season for raptors and migratory birds (February 15 through September 15). However, if this is not possible, then a qualified biologist will conduct a raptor nesting survey prior to construction to determine the presence or absence of nests in the riparian habitat, and the potential need for additional project mitigation measures.	BIO-15 Page 54 of MND	Biologist and Contractor		

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<b>BIO-16 Nest Buffers</b>	<p>To the greatest extent feasible, vegetation clearing, dredging, and other mechanized activities within 500 feet of undeveloped vegetation communities will be conducted outside the breeding season for federally protected migratory and listed bird species. In situations where these types of maintenance activities will occur adjacent to undeveloped vegetation communities during the breeding season (February 15 through September 15), the following measures will be implemented:</p> <ol style="list-style-type: none"> <li>1. A preconstruction survey for migratory birds shall be performed by a qualified biologist within 3 days prior to any removal of trees, shrubs, or structures on the project site. If no active nests are found, then no further action will be warranted.</li> <li>2. If an active nest is detected on or within 300 feet of the project site (500 feet for raptors), no work shall be conducted within a 300-foot radius (500 feet for raptors) of the detected nest until a biological monitor determines the nest is no longer active.</li> </ol>	BIO-16 Page 54 of MND	Biologist and Biological Monitor		
<b>BIO-17 State- Listed and Federally Listed Bird Species</b>	<p>For those facilities where state-listed and/or federally listed bird species have potential to occur within the project footprint, a qualified biologist will make three separate visits (on separate days), with the final visit being not more than 3 days prior to the maintenance activity. These three survey visits will supersede the preconstruction surveys required under BIO-1 and BIO-15.</p>	BIO-17 Page 54 of MND	Biologist		
<b>BIO-18 Bat Species</b>	<p>For those facilities where special-status bat species have potential to occur within the project footprint, a qualified biologist will survey for roosting bats concurrently with the preconstruction surveys required under BIO-1 and BIO-15. The same conditions identified in BIO-15 will apply to roosting bats</p>	BIO-18 Page 54 of MND	Biologist		
<b>BIO-19 Rare Plants</b>	<p>Pre-activity Surveys – For those facilities where San Diego ambrosia has the potential to occur within the maintenance site footprint, a qualified biologist(s) will perform focused surveys prior to maintenance activities and will flag avoidance areas if the species is detected. If ambrosia is detected within the maintenance footprint and cannot be avoided, O&amp;M activities within that maintenance footprint will be postponed and consultation will be reinitiated by the U.S. Army Corps of Engineers with the U.S. Fish and Wildlife Service to address</p>	BIO-19 Page 54 of MND	Biologist and Biological Monitor		

Mitigation Measure	Description	Identification No. Location in Doc.	Responsibility for Implementation	Certified Initials/Date	Comments
	adverse effects on ambrosia and develop feasible impact minimization measures (e.g., plant and/or seed salvage). O&M activities at that maintenance site will not resume until consultation between the U.S. Army Corps of Engineers and U.S. Fish and Wildlife Service is completed and all feasible measures are implemented. Results of focused surveys for ambrosia will be valid for 3 years; facilities with survey results older than 3 years may require repeat surveys.				
BIO-20 <b>San Diego Ambrosia</b>	Weed whipping or other non-ground disturbing activities may occur in occupied habitat for San Diego ambrosia (when presence is documented by focused surveys conducted every 3 years as described in BIO-19) if the following measures are implemented: <ul style="list-style-type: none"> <li>a. Conduct activities outside of the blooming period (April 1 through October 31) and 72 hours after any significant rain events (0.25 inch or more), when the soil is hard, and when no vegetative growth is visible.</li> <li>b. Avoid the application of herbicide in areas where listed plant species occur (unless concurred with by the Agencies for specific problem plants such as artichoke thistle). If no listed plant species are present, herbicide application may occur under the direction of a licensed applicator.</li> <li>c. Use a machine mower only if soil is not wet or muddy.</li> <li>d. Remove weed thatch carefully so that soil is not disturbed (i.e., avoid disturbing the seed bank or corms).</li> </ul>	BIO-20 Page 55 of MND	Biologist and Contractor		
BIO-21 <b>Oak Trees</b>	Oaks require special avoidance. Heavy equipment shall not encroach on the root protection zone (i.e., 50 feet from the drip line) within undeveloped areas, nor will equipment be staged/stockpiled in these areas. A qualified biologist shall flag root protection zones as off-limits at applicable facilities, prior to starting work. Specific types of work and equipment may be approved within the root protection zone if approved by a certified arborist.	BIO-21 Page 55 of MND	Biologist		
BIO-22 <b>Complete Avoidance of Special-Status Species</b>	The City will strive for 100 percent avoidance of direct impacts to special-status plant and wildlife species and will use biological monitors and preconstruction surveys to ensure avoidance (per BIO-1, BIO-16, BIO-17, BIO-18, BIO-19, BIO-20, and BIO-21).	BIO-22 Page 55 of MND	City of Escondido		

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<p>BIO-23 Compensatory Mitigation</p>	<p>All potentially significant project impacts will occur within habitats that are also potential jurisdictional waters. Compensatory mitigation for jurisdictional waters, as described below, will reduce potentially significant impacts to natural habitats to a level below significance. Because the project will avoid potentially significant impacts to special-status species and wildlife migration, no mitigation is necessary above and beyond the habitat-based compensatory mitigation for jurisdictional waters described below.</p> <p>The proposed project necessitates work within and around jurisdictional waters. As demonstrated in the previous section, the City has made great efforts to minimize impacts to the greatest extent practicable, while also maintaining the objectives of the project; however impacts to potential jurisdictional waters remain a part of the proposed project.</p> <p>These impacts will be mitigated to a level below significance through permittee-responsible off-site mitigation in the form of restoration and/or enhancement or through the purchase of restoration and enhancement credits at the San Luis Rey Mitigation Bank. The City is currently pursuing permittee-responsible mitigation in the form of restoration and enhancement activities within Kit Carson Park. The City is currently in negotiations with the agencies and has prepared a draft mitigation plan for their review and approval. A final mitigation plan will be approved as a condition of the 404, 401, and 1602 authorizations, respectively. Final mitigation ratios will be generally consistent with the guidelines of relevant regional conservation plans, including the North County MSCP and Draft Escondido Subarea MHCP. In the event that the Kit Carson Park mitigation or other permittee-responsible site is not approved, the City will purchase mitigation credits from San Luis Rey Mitigation Bank or another appropriate bank approved through the applicable authorizations.</p> <p>Mitigation ratios will be based on resource tiers, as defined above (Table 3-6 and Table 3-7 of the IS/MND) for impacts on 0.64-acre of waters of the U.S. and 1.05 acres of CDFW jurisdictional waters.</p>	<p>BIO-23 Page 55 of MND</p>	<p>City of Escondido</p>		

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<b>Cultural Resources</b>					
<p>CR-1 <b>Archaeological Monitor and Native American Monitoring</b></p>	<p>The applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a pre-excavation agreement) with a tribe that is traditionally and culturally affiliated with the project location (TCA Tribe) prior to issuance of ground-disturbing activities. The purpose of the agreement is to provide the applicant with clear expectations regarding tribal cultural resources and to formalize protocols and procedures between them. The applicant and the TCA Tribe are responsible for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas, and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities.</p> <p>Prior to ground disturbing activities, the applicant shall provide written verification to the City that a qualified archaeologist and a Native American monitor associated with a TCA Tribe have been retained to implement the monitoring program.</p> <p>An archaeological monitor under the supervision of the qualified archaeologist will be present during the first maintenance activity that involves ground disturbing activities at the following earthen facilities: E-54, E-55, E-58, E-60, H-16, H-19, and SM-05.</p> <p>A Native American monitor will be present during the first maintenance activity that involves ground disturbing activities at the following facilities: E-53, E-54, E-55, E-56, E-58, E-60, H-15, H-16, H-17, H-19, H-20, H-21, and SM-05.</p> <p>The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City in a letter from the project archaeologist that confirms the selected Native American monitor is associated with a TCA Tribe. The City, prior to any preconstruction meeting, shall approve all persons involved in the monitoring program. The qualified archaeologist and Native American monitor shall attend the pre-grading meeting with the grading contractors (if a pre-grading meeting is required) to explain and coordinate the requirements of the</p>	<p>CR-1 Page 60 of MND</p>	<p>Archaeological Monitor and Native American Monitor</p>		

Mitigation Measure	Description	Identification No. Location in Doc.	Responsibility for Implementation	Certified Initials/Date	Comments
	monitoring program.				
<b>CR-2 Unanticipated Discovery and Avoidance of Archaeological Resources</b>	<p>If an unanticipated archaeological resource is discovered during monitoring, if feasible, it will be avoided. Unanticipated archaeological discoveries made during monitoring will be addressed following procedures identified in the Monitoring and Discovery Plan. In the event that previously unidentified tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed. Mitigation Measures CR-3 and/or CR-4 may be implemented if appropriate.</p>	CR-2 Page 61 of MND	Archaeological Monitor and Contractor		
<b>CR-3 Testing of Archaeological Resources</b>	<p>In the event that previously unidentified tribal cultural resources are discovered, the qualified archaeologist and the Native American monitor shall have the authority to temporarily divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits shall be minimally documented in the field and collected so the monitored grading can proceed. If an unanticipated archaeological discovery is potentially significant and cannot be avoided, an evaluation plan that identifies research topics and procedures for evaluation of the resource will be prepared. The evaluation plan will be a stand-alone document and will be implemented prior to ground-disturbing maintenance activities.</p> <p>If a potentially significant tribal cultural resource is discovered, the archaeologist shall notify the City of said discovery. The qualified archaeologist, in consultation with the City, the TCA Tribe, and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe and the Native American monitor and be submitted to the City for review and approval.</p>	CR-3 Page 61 of MND	Archaeological Monitor		

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<p>CR-4  <b>Data Recovery of Archaeological Resources</b></p>	<p>If a potentially significant tribal cultural resources and/or unique archaeological resource is discovered, the avoidance and/or preservation of the significant tribal cultural resource and/or unique archaeological resource must first be considered and evaluated as required by CEQA. Where any significant tribal cultural resources and/or unique archaeological resources have been discovered and avoidance and/or preservation measures are deemed to be infeasible by the City, then a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. The qualified archaeologist, in consultation with the Native American monitor, shall determine the amount of material to be recovered for an adequate sample of the resource for analysis. Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.</p> <p>If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any testing or cataloging of those resources. Moreover, if the qualified archaeologist does not collect the cultural resources that are unearthed during the ground-disturbing activities, the Native American monitor may, at their discretion, collect said resources and provide them to the TCA Tribe for respectful and dignified treatment in accordance with the TCA Tribe's cultural and spiritual traditions. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe. Should the TCA Tribe or other traditionally and culturally affiliated tribe decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.</p> <p>Prior to the release of the grading bond (if required) or completion of the project, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis, and conclusion of the archaeological monitoring program and any data recovery program on the project site</p>	<p>CR-4  Page 61 of  MND</p>	<p>Archaeological Monitor</p>		

Mitigation Measure	Description	Identification No. Location in Doc.	Responsibility for Implementation	Certified Initials/Date	Comments
	shall be submitted by the qualified archaeologist to the City. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources.				
CR-5 <b>Treatment of Human Remains</b>	If human remains are inadvertently discovered, they shall be treated according to appropriate State (Public Resources Code Section 5097.98, 5097.99, 5097.991, 7050.5, 8010-8011 and AB 2641); or on federal land NAGPRA provisions, as outlined in the Monitoring and Discovery Plan.	CR-5 Page 62 of MND	Archaeological Monitor		
<b>Hydrology and Water Quality</b>					
WQ-1 <b>Worker Awareness</b>	Prior to the start of the project, and annually thereafter, the City will educate all personnel on these avoidance and mitigation measures and other project best management practices (BMPs).	WQ-1 Page 83 of MND	City of Escondido		
WQ-2 <b>Minimization of Disturbance</b>	The City will ensure that activities and land disturbance are the minimum necessary to (1) remove sediment and debris for the proper functioning of the storm water conveyance system and (2) prevent stagnant and ponding water in areas that have been demonstrated to support mosquito breeding.  Where vegetation removal is necessary, the removal of native trees will be restricted in accordance with BIO-14..	WQ-2 Page 83 of MND	City of Escondido		
WQ-3 <b>Preservation of Existing Vegetation</b>	The City will preserve existing vegetation to the extent practicable and ensure implementation of BIO-13, riparian vegetation avoidance and BIO-14, native tree avoidance.	WQ-3 Page 83 of MND	City of Escondido		
WQ-4 <b>Scheduling of Maintenance Activities</b>	Maintenance activities will be scheduled to avoid or minimize earth disturbance during the wet season to the maximum extent practicable.	WQ-4 Page 83 of MND	Contractor		
WQ-5 <b>Erosion and Sediment Control</b>	Maintenance activities will include a combination of BMPs for soil erosion and sediment control depending on site conditions, which can include:  Erosion control/slope stabilization/bank protection <ul style="list-style-type: none"> <li>• erosion control blankets</li> <li>• soil stabilizers</li> <li>• organic mulch, such as wood chips and vegetation</li> <li>• riprap</li> </ul>	WQ-5 Page 83 of MND	Contractor		

Mitigation Measure	Description	Identification No. Location in Doc.	Responsibility for Implementation	Certified Initials/Date	Comments
	Temporary sediment controls: <ul style="list-style-type: none"> <li>• silt fence</li> <li>• sediment/desilting basins</li> <li>• sediment traps</li> <li>• fiber rolls</li> <li>• gravel bag berm/barrier/dam</li> <li>• straw bale barrier</li> <li>• waterbag dams</li> <li>• filters/filter bags</li> </ul>				
WQ-6 <b>Inspection of Erosion and Sediment Control</b>	All erosion and sediment control measures will be inspected/maintained to ensure proper integrity and function during the duration of maintenance activities. All post-activity stabilization and structural controls would be inspected for the duration of the maintenance activities and would be repaired or maintained for optimum performance.	WQ-6 Page 83 of MND	Contractor		
WQ-7 <b>Channel Alteration</b>	If a stream channel, gradient, or lake margin have been temporarily altered during maintenance activities, the City will return the area to original design specifications or as closely as possible to pre-project conditions without creating a possible future bank erosion problem. Post-activity bank stabilization techniques (sediment and erosion control) will be implemented to further protect against bank erosion.	WQ-7 Page 83 of MND	City of Escondido		
WQ-8 <b>Site Access Management</b>	<p>The City will ensure that access routes to maintenance areas are selected and designed to minimize impacts to receiving waters, in particular the discharge of identified pollutants to an already impaired water body.</p> <p>Soil-tracking BMPs will be implemented to limit off-site transport of sediment from vehicles by implementing measures and site access points such as metal corrugated shaker plates, gravel strips, and/or wheel-washing sites.</p>	WQ-8 Page 83 of MND	City of Escondido		
WQ-9 <b>Vehicle/Equipment Operation</b>	<p>The City will not operate equipment or vehicles in ponded or flowing areas except as otherwise addressed in any of the project's applicable regulatory permits.</p> <p>If maintenance activities require moving equipment across a flowing stream, the City will implement/install measures to prevent an increase to stream turbidity.</p>	WQ-9 Page 84 of MND	City of Escondido		
WQ-10 <b>CWA Section 404 Compliance</b>	Potential impacts to regulated waters and wetlands will be minimized through avoidance and minimization measures. Refer to Section IV, Biological Resources, and Mitigation Measure BIO-23.	WQ-10 Page 84 of MND	City of Escondido		

Mitigation Measure	Description	Identification No. Location in Doc.	Responsibility for Implementation	Certified Initials/Date	Comments
WQ-11 <b>Site Spoil Management</b>	The City will ensure that spoil sites shall not be located next to surface waters where spoil dewatering could potentially affect water quality, or where it will cover aquatic or riparian vegetation unless the site is specifically identified in the project's Notification of Lake or Streambed Alteration application.	WQ-11 Page 84 of MND	City of Escondido		
WQ-12 <b>Staging + Stockpiling</b>	Work materials, staging, storage, dispensing, fueling, and equipment maintenance activities will be located in upland areas outside of sensitive habitat, and adequate measures will be taken to prevent any potential runoff from entering receiving waters. Staging areas will be located within facility footprints or adjacent urban/developed areas.	WQ-12 Page 84 of MND	Contractor		
WQ-13 <b>Trash Management</b>	Spoils, trash, or any debris will be removed off-site to an approved disposal facility.	WQ-13 Page 84 of MND	Contractor		
WQ-14 <b>Water Diversion/Dewatering</b>	<p>All surface waters, including ponded waters, will be diverted away from areas undergoing dredging or vegetation removal and/or any other activity that may result in a discharge to the receiving water. When water diversion is necessary, a temporary dam or other artificial obstruction will be constructed using materials that will cause little or no siltation and ensure water does not enter the work area. Water will be diverted around the maintenance facility without completely obstructing stream flow. When maintenance is completed, the flow diversion structure will be removed as soon as possible in a manner that allows flow to resume and prevents accumulated debris or sediment from returning to the stream.</p> <p>If dewatering is conducted, either a pump will move water to an upland disposal site, or a sediment basin or other structure will be used to collect and treat the water. If applicable, a National Pollutant Discharge Elimination System permit may be required. If not applicable, the water returned to the waterway should be equivalent in nature to pre-activity conditions.</p> <p>Additional water quality measures may arise as conditions of the 401 Water Quality Certification or Nationwide Permit #33 (if pursued) and applicable stipulations of a 1602 SAA, if applicable. The City will adhere to these and any other applicable conditions and avoidance measures.</p>	WQ-14 Page 84 of MND	Contractor and City of Escondido		

<b>Mitigation Measure</b>	<b>Description</b>	<b>Identification No. Location in Doc.</b>	<b>Responsibility for Implementation</b>	<b>Certified Initials/Date</b>	<b>Comments</b>
WQ-15 <b>Spill Control</b>	The City will maintain appropriate types and sufficient quantities of materials on-site to contain any spill or inadvertent release of materials that may cause a condition of pollution or nuisance if the materials reach waters of the U.S. and/or state.	WQ-15 Page 84 of MND	City of Escondido		
WQ-16 <b>Vehicle/Equipment Maintenance</b>	The City will ensure that all vehicles and equipment utilized for maintenance activities are well maintained and not leaking fluids. Vehicle or equipment maintenance (including fueling) will not be performed on-site or in a manner that could contribute pollutants to receiving waters.	WQ-16 Page 84 of MND	City of Escondido		
WQ-17 <b>Post-Activity Erosion and Sediment Control</b>	Post-maintenance activity erosion and sediment control will be implemented as applicable, including landscape planting and other slope stabilization techniques (i.e., hydroseed and/or hydromulch).	WQ-17 Page 84 of MND	Contractor		

