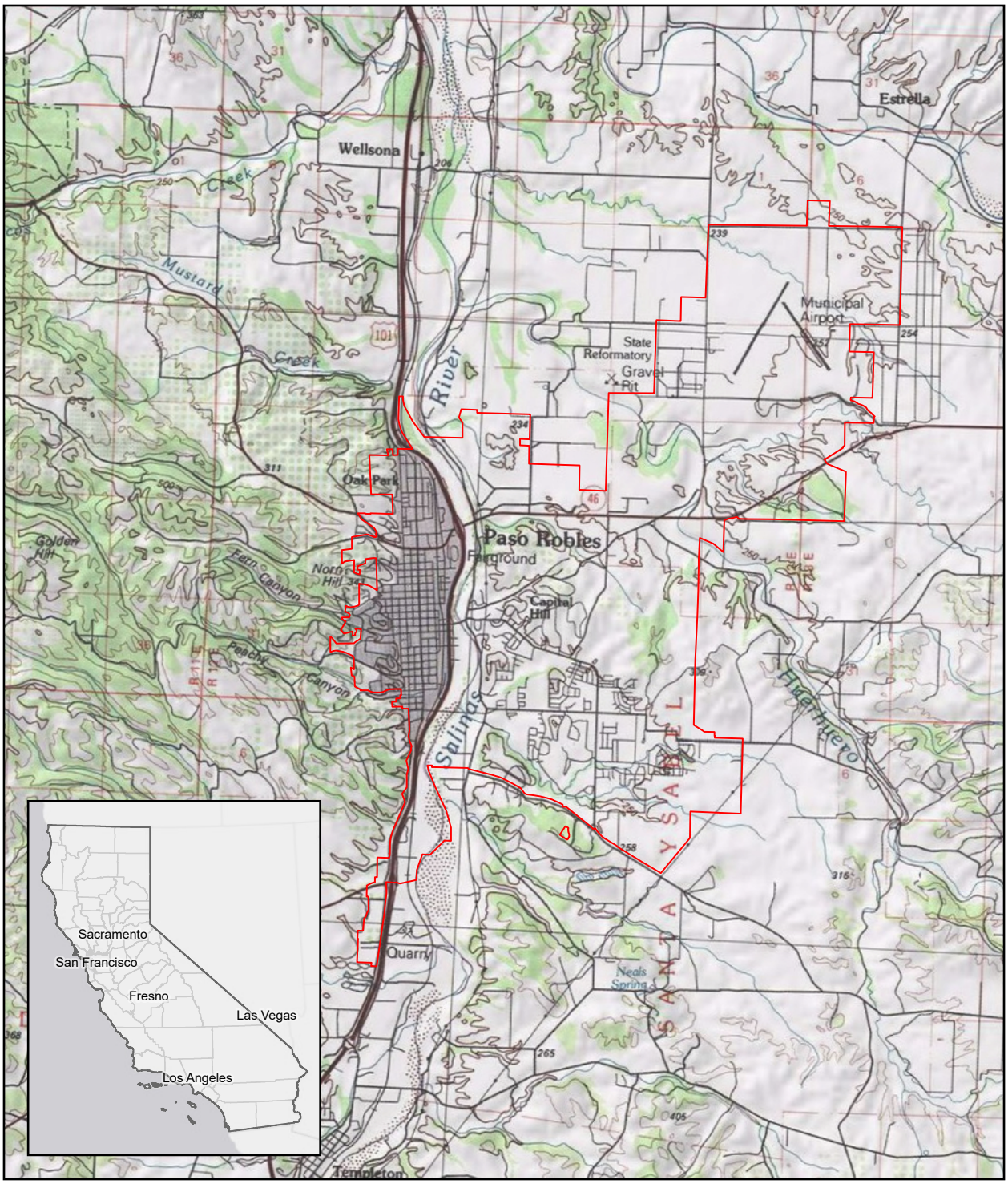
Exhibit 1: Project Vicinity Map

Figure 1. United States Geological Survey Topographic Map



Legend

Project Location — City of Paso Robles

USA Topo Maps

0 1 2 Miles

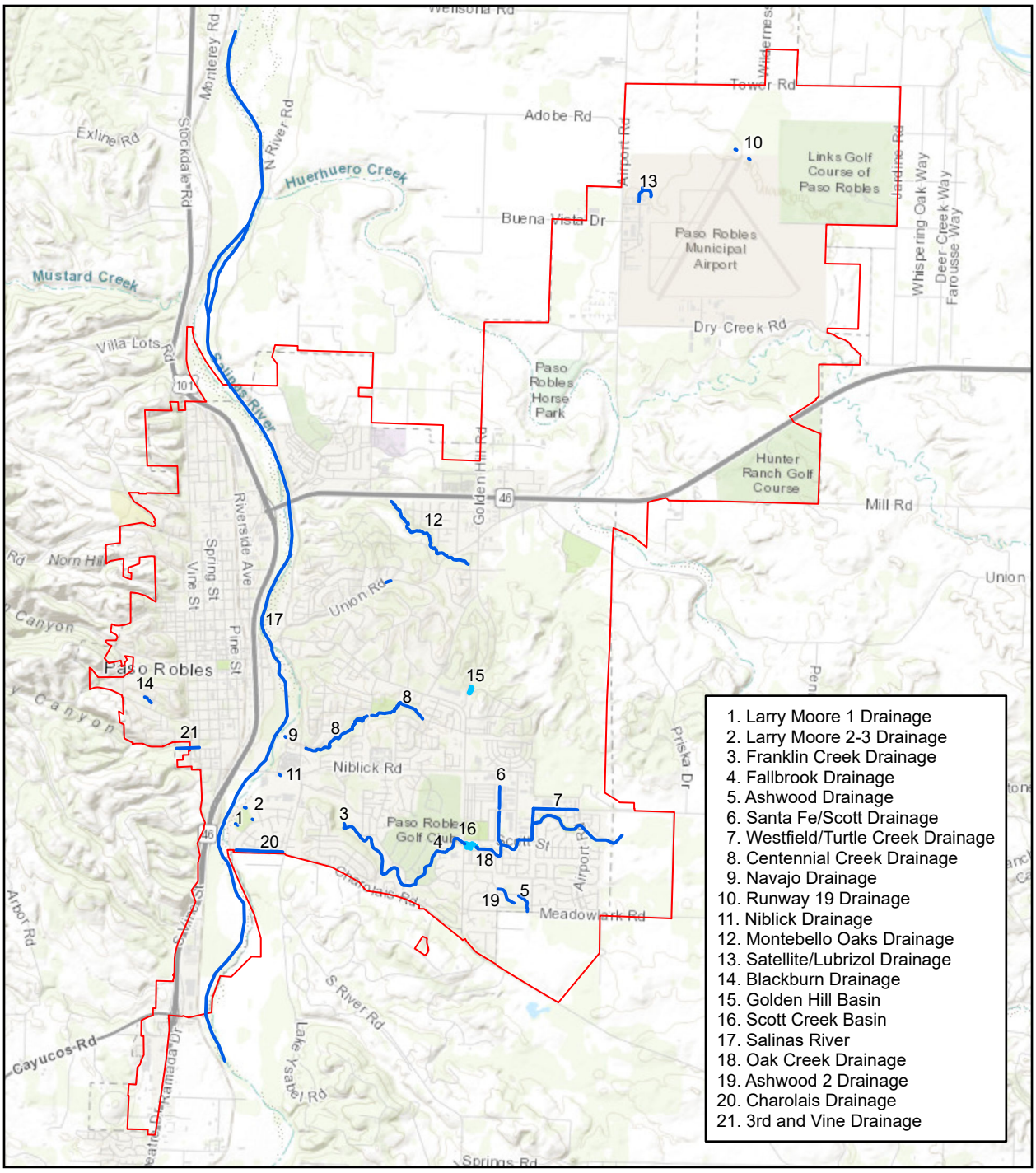
City of Paso Robles
Routine Vegetation Maintenance Project
Map Center: 120.67625°W 35.63282°N
Templeton, San Luis Obispo County

USGS Quadrangle: Paso Robles and Templeton

Map Updated:
December 11, 2020 03:06 PM by SAF

Exhibit 2: Flood Control Locations

Figure 2. Routine Maintenance Locations



Legend

City of Paso Robles

CDFW Jurisdictional Waterway

CDFW Jurisdictional Basin

N

0 1 2 Miles

City of Paso Robles
Routine Vegetation Maintenance Project
Map Center: 120.6529°W 35.63525°N
Paso Robles, San Luis Obispo County

Basemap: World Topographic

Map Updated:
December 11, 2020 02:08 PM by SAF

Exhibit 3: Fire Fuel Load Reduction Areas

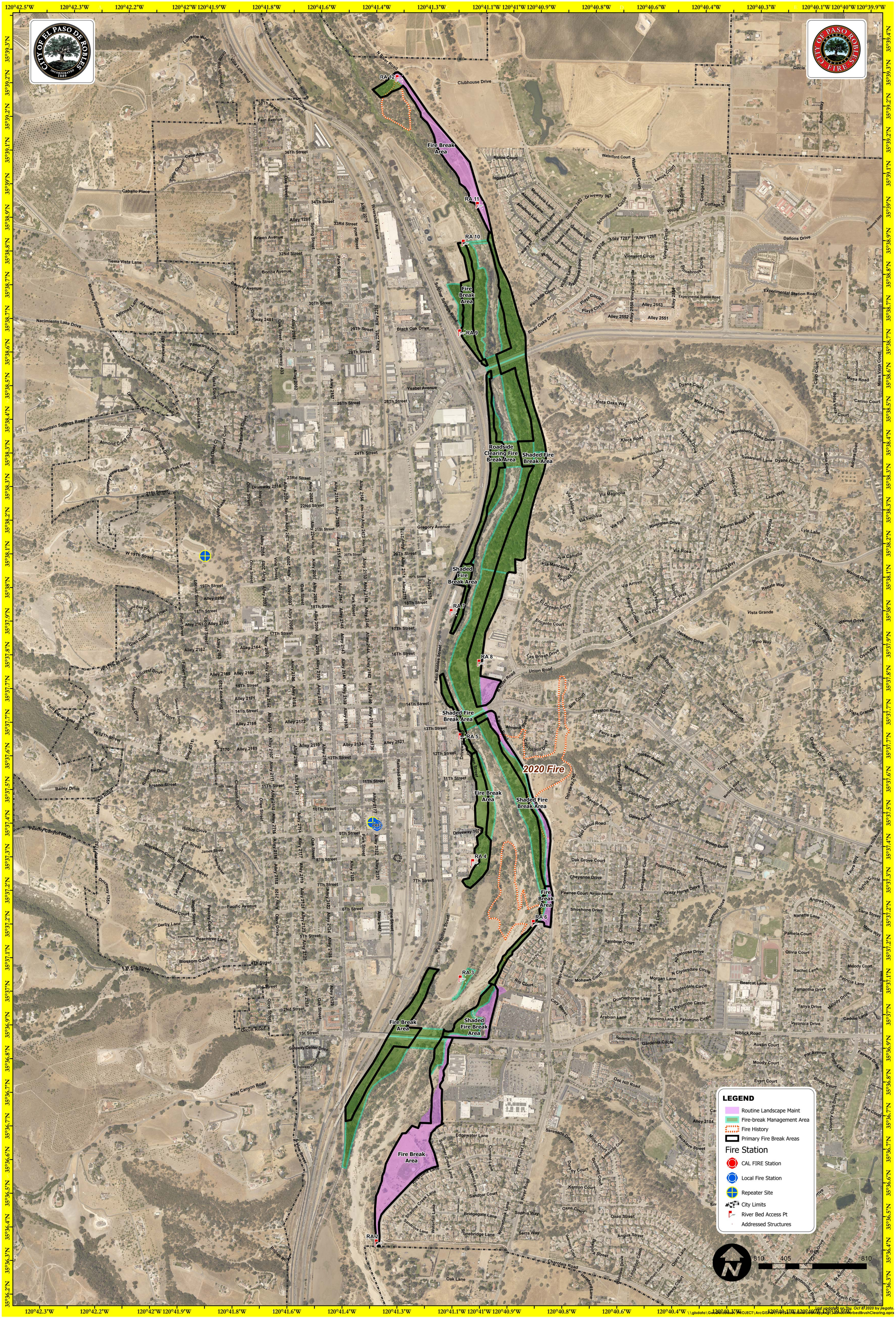
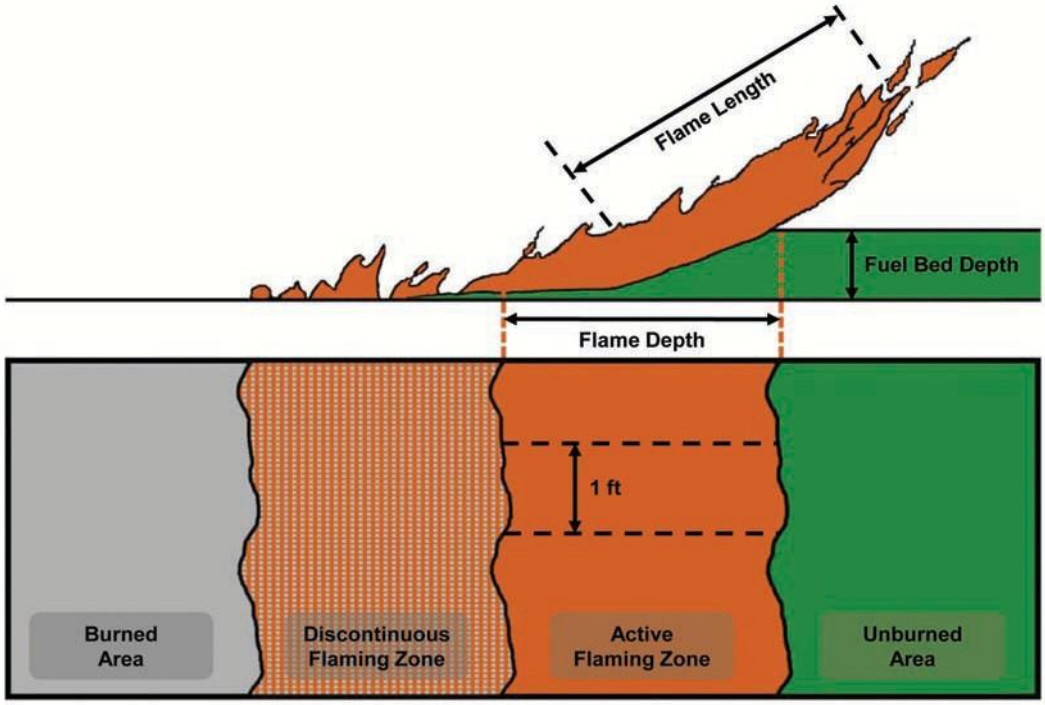

CITY OF EL PASO DE ROBLES
INCORPORATED 1889
CITY OF PASO ROBLES FIRE DEPARTMENT
RA 12
RA 11
RA 10
RA 9
RA 7
RA 8
RA 5
RA 4
RA 6
RA 3
RA 2
Fire Break Area
Roadside Clearing Fire Break Area
Shaded Fire Break Area
2020 Fire
LEGEND
Routine Landscape Maint
Fire-break Management Area
Fire History
Primary Fire Break Areas
Fire Station
CAL FIRE Station
Local Fire Station
Repeater Site
City Limits
River Bed Access Pt
Addressed Structures
Feet
810
405
0
810
Last updated on Tue, Oct 6 2020 by jlegato.
\\gisdata\GeoDatabase\PROJECT\ArcGISPro\FireFuelsMaster\BeamMapping\SalinasRiverbedBrushClearing.aprx

Exhibit 4: Desired Conditions for Fuel Beds within the Salinas River Fuels Reduction Project

Desired Conditions for Fuel Beds within The Salinas River Fuels Reduction Project

The diagram and chart below are from “How to Generate and Interpret Fire Characteristics Charts for Surface and Crown Fire Behavior” and the fuel models are from “Standard Fire Behavior Fuel Models: A Comprehensive Set for Use with Rothermel’s Surface Fire Spread Model”. We included this information to show the importance of the relationship between flame lengths and fire suppression efforts. By reducing the tons per acre to the desired levels listed, we can significantly lower flame lengths within the given fuel beds throughout the Salinas River, create a safer environment for firefighters to engage fire, and increase the probability of success when suppressing fires to the riverbed before they transition into the inhabitable portions of the community.



The diagrams illustrate the relationship between flame length and fireline intensity. A side view of a wind-driven fire shows that flame length is measured from midway in the active flaming zone to the average tip of the flames. The overhead view illustrates that fireline intensity is the heat energy release per unit time from a foot (or meter) wide section of the fuel bed extending from the front to the rear of the active flaming zone

Table 1—Relationship of surface fire flame length and fireline intensity to suppression interpretations.

Flame length		Fireline intensity		Interpretation
ft	m	Btu/ft/s	kJ/m/s	
< 4	< 1.2	< 100	<350	• Fires can generally be attacked at the head or flanks by persons using hand tools. • Hand line should hold the fire.

4 – 8	1.2 – 2.4	100 – 500	350 – 1700	• Fires are too intense for direct attack on the head by per- sons using hand tools. • Hand line cannot be relied on to hold the fire. • Equipment such as dozers, pumpers, and retardant aircraft can be effective.
8 – 11	2.4 – 3.4	500 – 1000	1700 – 3500	• Fires may present serious control problems—torching out, crowning, and spotting. • Control efforts at the fire head will probably be ineffective
> 11	> 3.4	> 1000	> 3500	• Crowning, spotting, and major fire runs are probable. • Control efforts at head of fire are ineffective.

Grass Fuel Type Models (GR)

The primary carrier of fire in the GR fuel models is grass. Grass fuels can vary from heavily grazed grass stubble or sparse natural grass to dense grass more than 6 feet tall. Fire behavior varies from moderate spread rate and low flame length in the sparse grass to extreme spread rate and flame length in the tall grass models.

The effect of live herbaceous moisture content on spread rate and intensity is strong.

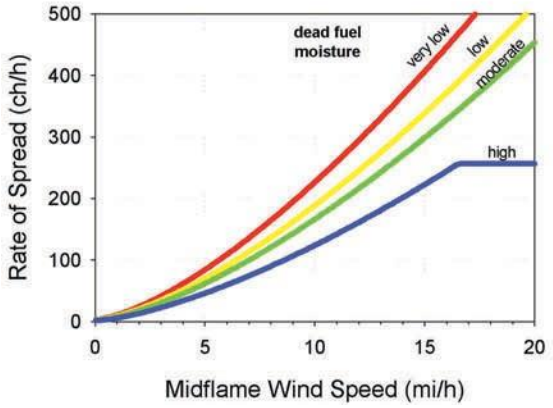
Fuel model GR4 represents the continues grass fuel bed within the Salinas River, though there are areas with a higher load than GR4, we do not feel it is enough to push it to GR7. The characteristics of fuel model GR1 are the desired conditions for these fuel beds within the project area. Reducing the tons per acre below .5 lowers the flame length to less than three feet during peak fire season. As a general rule, fires with flame lengths of four feet or less can be suppressed by ground personnel and limits the need for heavy equipment and aircraft.

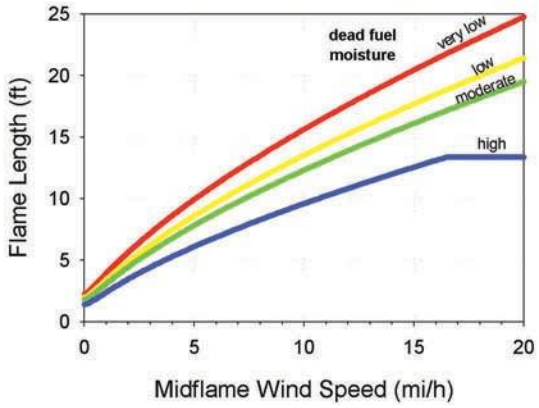
GR4 (104)

Moderate Load, Dry Climate Grass (Dynamic)

Description: The primary carrier of fire in GR4 is continuous, dry-climate grass. Load and depth are greater than GR2; fuelbed depth is about 2 feet.

Fine fuel load (t/ac)	2.15
Characteristic SAV (ft-1)	1826
Packing ratio (dimensionless)	0.00154
Extinction moisture content (percent)	15



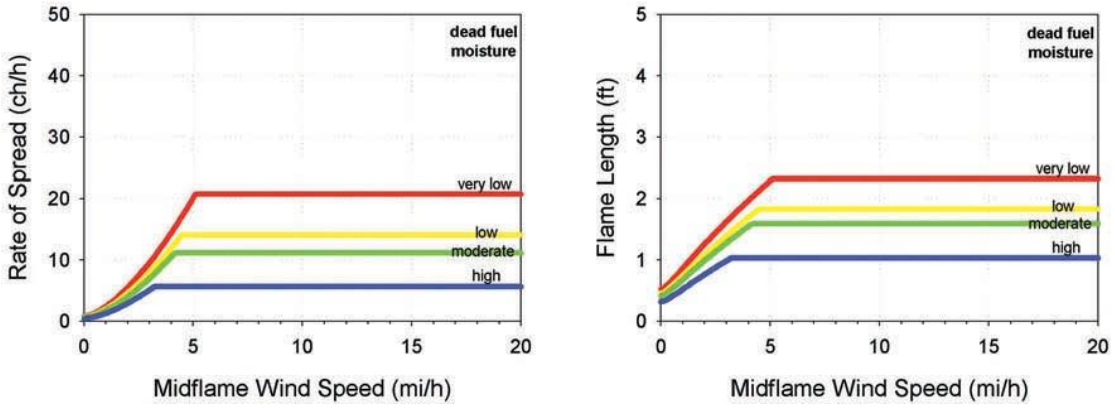


GR1 (101)

Short, Sparse Dry Climate Grass (Dynamic)

Description: The primary carrier of fire in GR1 is sparse grass, though small amounts of fine dead fuel may be present. The grass in GR1 is generally short, either naturally or by grazing, and may be sparse or discontinuous. The moisture of extinction of GR1 is indicative of a dry climate fuelbed, but GR1 may also be applied in high-extinction moisture fuelbeds because in both cases predicted spread rate and flame length are low compared to other GR models.

Fine fuel load (t/ac)	0.40
Characteristic SAV (ft-1)	2054
Packing ratio (dimensionless)	0.00143
Extinction moisture content (percent)	15



Grass-Shrub Fuel Type Models (GS)

The primary carrier of fire in the GS fuel models is grass and shrubs combined; both components are important in determining fire behavior.

The effect of live herbaceous moisture content on spread rate and intensity is strong and depends on the relative amount of grass and shrub load in the fuel model.

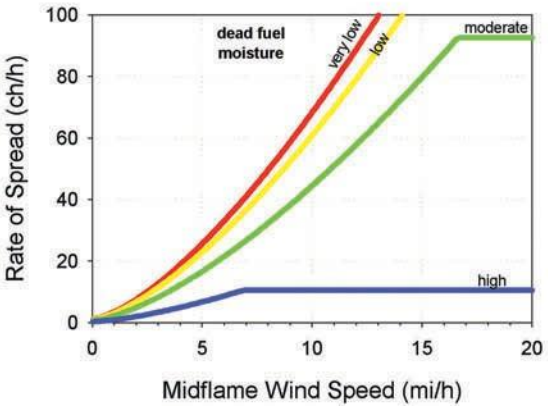
Fuel model GS2 best represents the grass-shrub fuel bed in areas of the Salinas River. Reducing the fuels to represent the characteristics of GS1 would lower the flame lengths from 10-15 feet to 8 feet or less during peak fire season. The reduction in fuels can be accomplished primarily through grazing. Fires with flame lengths of 8 feet or less can generally be effectively suppressed using heavy equipment, aircraft, and ground personnel.

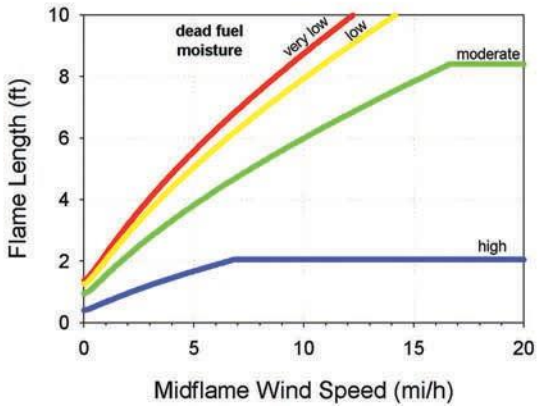
GS2 (122)

Moderate Load, Dry Climate Grass-Shrub (Dynamic)

Description: The primary carrier of fire in GS2 is grass and shrubs combined. Shrubs are 1 to 3 feet high, grass load is moderate. Spread rate is high; flame length moderate. Moisture of extinction is low.

Fine fuel load (t/ac)	2.1
Characteristic SAV (ft-1)	1827
Packing ratio (dimensionless)	0.00249
Extinction moisture content (percent)	15



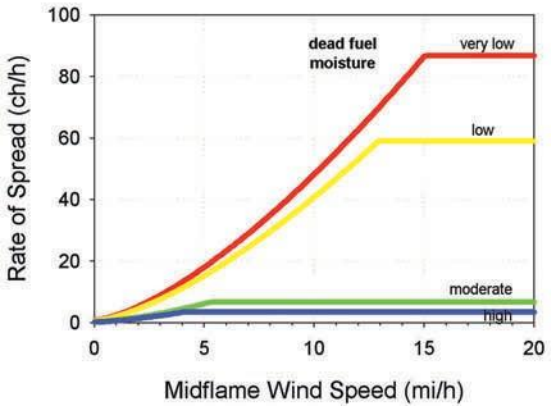


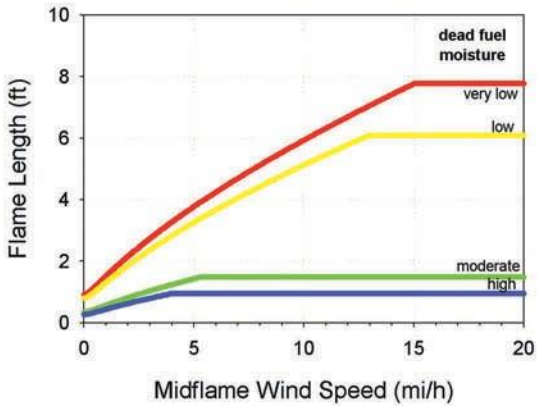
GS1 (121)

Low Load, Dry Climate Grass-Shrub (Dynamic)

Description: The primary carrier of fire in GS1 is grass and shrubs combined. Shrubs are about 1 foot high, grass load is low. Spread rate is moderate; flame length low. Moisture of extinction is low.

Fine fuel load (t/ac)	1.35
Characteristic SAV (ft-1)	1832
Packing ratio (dimensionless)	0.00215
Extinction moisture content (percent)	15





Shrub Fuel Type Models (SH)

The primary carrier of fire in the SH fuel models is live and dead shrub twigs and foliage in combination with dead and down shrub litter. A small amount of herbaceous fuel may be present, especially in SH1 and SH9, which are dynamic models (their live herbaceous fuel load shifts from live to dead as a function of live herbaceous moisture content). The effect of live herbaceous moisture content on spread rate and flame length can be strong in those dynamic SH models.

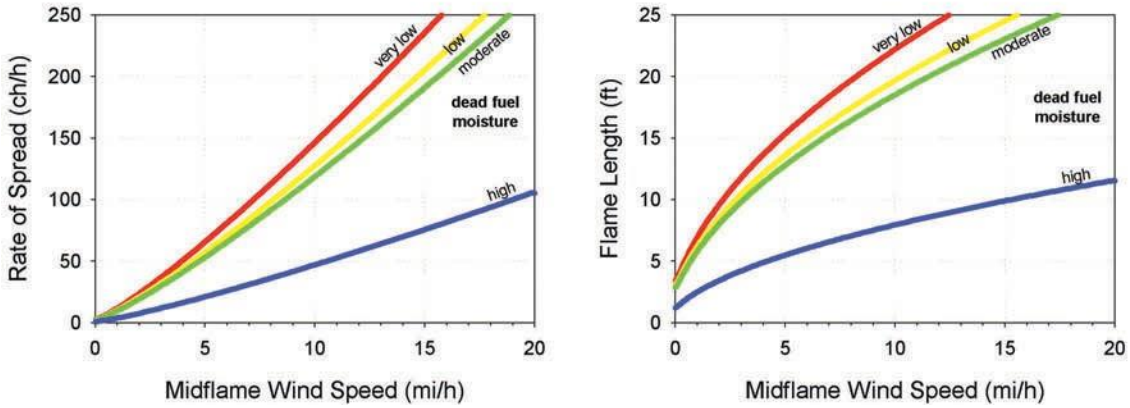
Fuel model SH5 best represents dense areas, primarily interior islands within the Salinas River and areas without tree canopy cover. Fires that become established within these fuel beds are extremely resistant to fire suppression efforts. Treating the denser areas of this fuel model, while focusing on the fuel reduction of the vegetation that exhibits a higher dead to live fuel ratio, will reduce fire intensity and spotting potential. There is not a current fuel model that best represents the conditions we are striving to achieve within the project area for this fuel model. The desired conditions within this fuel model is a reduce fuels loading by 50% to three tons per acre. We seek to achieve this objective mainly by removing the high concentrations of dead fuels while leaving a mosaic fuel bed with a higher concentration of live vegetation.

SH5 (145)

High Load, Dry Climate Shrub

Description: The primary carrier of fire in SH5 is woody shrubs and shrub litter. Heavy shrub load, depth 4-6 feet. Spread rate very high; flame length very high. Moisture of extinction is high.

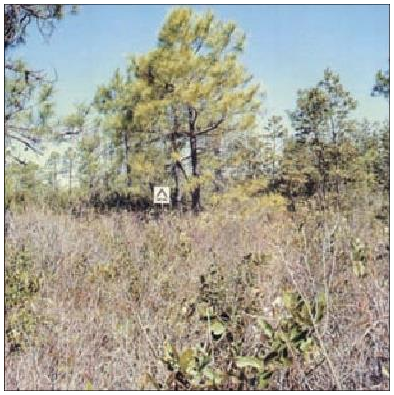
Fine fuel load (t/ac)	6.5
Characteristic SAV (ft-1)	1252
Packing ratio (dimensionless)	0.00206
Extinction moisture content (percent)	15



Fuel model SH8 best represents areas within the Salinas River with tree canopy cover that have dense shrub and grass understories. Fires that become established in this fuel bed move quickly through the understory, also known as latter fuel, and transition into the tree canopies. These fires are extremely resistant to fire suppression efforts by both ground and air resources and produce fires with long range spotting. By reducing the latter fuels beneath the tree canopy, we can reduce tree mortality among the larger trees due to fire and reduce flame lengths. By reducing the latter fuels reaching from the ground to the canopy there will be a reduction of spotting. This reduction in spotting will equate to a safer and more effective fire response. The desired condition is to reduce the tons per acre in this fuel model to less than two tons per acre.

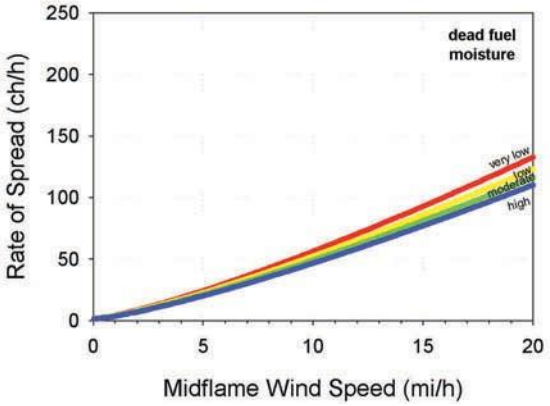
SH8 (148)

High Load, Humid Climate Shrub



Description: The primary carrier of fire in SH8 is woody shrubs and shrub litter. Dense shrubs, little or no herbaceous fuel, fuelbed depth about 3 feet. Spread rate is high; flame length high.

Fine fuel load (t/ac)	6.4
Characteristic SAV (ft-1)	1386
Packing ratio (dimensionless)	0.00509
Extinction moisture content (percent)	40



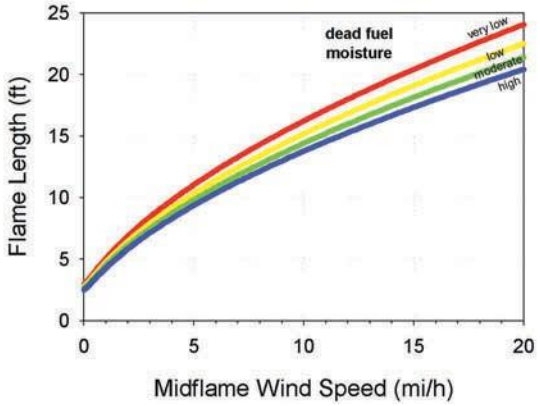


Exhibit 5: 2019 Fire Fuel Load Reduction Map

EMERGENCY FUEL BREAK PROJECT

Exhibit 6: 2020 Fire Fuel Load Reduction Map

RA 12
Clubhouse Drive
1.6 AC
2020 Fire
N River Road
9.7 AC
MOW
Robie Court
Waterford Court
Riverside Avenue
RA 11
34Th Street
Alley 2079
Ingalls Court
Traditions Loop
Monrovia Lane
Altadena Lane
Driveway 967
Driveway 2452
Schoolhouse Circle
33Rd Street
Pine Street
RA 10
32Nd Street
Pasadena Lane
The Esplanade
Gamble Lane
Alameda Lane
Benicia Lane
River Oaks Drive
Alley 1287
Alley 1536
Vineyard Circle
Willits Lane
Palo Alto Court
MOW
10.6 AC
30Th Street
Experimental Station Road
Playa Circle
Alley 2260
Sulphur Springs Road
10.3 AC
Alley 2552
Black Oak Drive
29Th Street
RA 9
Alley 2261
28Th Street
CREW/MOW
Ysabel Avenue
Alley 2157
26Th Street
13.1 AC
Vista Oaks Way
MOW
15.8 AC
CREW
24Th Street
Park Street
MOW
16.8 AC
23Rd Street
Alley 2156
LEGEND
Fire History
CAL FIRE Station
Local Fire Station
Repeater Site
Barricade / No Outlet
River Bed Access Pt
Addressed Structures
Railroad
Highway
City Limits
Name
Routine Landscape Maint
Fire-break Management Area
Areas where Brush was Cleared
Feet
270 135 0 270
Last updated on Tue, Sep 15, 2020 by jlegato.


MOW
13.1 AC
15.8 AC
CREW
CREW/MOW
16.8 AC
MOW
RA 7
21.1 AC
RA 8
2.1 AC
CREW
RA 5
5.4 AC
2020 Fire
16.7 AC
12.1 AC
STRING TRIMMING
24Th Street
23Rd Street
22Nd Street
21St Street
20Th Street
19Th Street
18Th Street
17Th Street
16Th Street
15Th Street
14Th Street
13Th Street
12Th Street
11Th Street
10Th Street
9Th Street
Riverside Avenue
Gregory Avenue
Spring Street
Park Street
Pine Street
Railroad Street
Paso Robles Street
Garden Street
N River Road
S River Road
Almond Street
Creston Road
Ferro Lane
Capitol Hill Drive
Driveway 740
Moss Avenue
Via Magnolia
Via Lantana
Via Fuchsia
Via Camelia
Via Manzanita
Riverglen Drive
Via Briza Court
Via Rosa
El Dorado Court
Via Arroyo
Encanto Court
Via Promesa Drive
Las Brisas Drive
Union Road
Elm Court
Palm Court
Driveway 1076
Driveway 1083
PRF1
LEGEND
Fire History
CAL FIRE Station
Local Fire Station
Repeater Site
Barricade / No Outlet
River Bed Access Pt
Addressed Structures
Railroad
Highway
City Limits
Name
Routine Landscape Maint
Fire-break Management Area
Areas where Brush was Cleared
Feet
270 135 0 270
N
Last updated on Tue, Sep 15, 2020 by jlegato.

PRF1
9Th Street
Driveway 1076
16.7 AC
12.1 AC
RA 4
STRING TRIMMING
5.4 AC
2020 Fire
RA 6
Navajo Avenue
Vista Del Rio Court
0.8 AC
RA 3
CREW
9.1 AC
MOW
GRAZING
13.8 AC
Niblick Road
21.5 AC
MOW
RA 2
8Th Street
7Th Street
6Th Street
5Th Street
4Th Street
3Rd Street
2Nd Street
1St Street
Park Street
Spring Street
Oak Street
Pine Street
Velta Circle
Paso Robles Street
Riverside Avenue
Alley 2121
Alley 2122
Alley 2123
Alley 2124
Alley 2125
Alley 2126
Alley 2129
Alley 2130
Alley 2131
Alley 2132
Alley 2487
Center Drive
Cheyenne Drive
Pawnee Court
Shoshone Drive
Mohawk Court
Rio Court
Cary Street
Oak Hill Road
S River Road
Serenade Drive
Miller Court
Edgewater Lane
Riverbank Lane
Canyon Crest Lane
Creeksand Lane
Current Lane
Summer Creek Lane
Shadow Creek Lane
Sandbar Court
Stillwater Court
Bridgegate Lane
Waterfall Lane
Sandcove Lane
Willowbank Lane
Stonebridge Lane
Sophia Way
Serra Way
Dorsey Court
Kenton Court
Angus Street
S Vine St
LEGEND
Fire History
CAL FIRE Station
Local Fire Station
Repeater Site
Barricade / No Outlet
River Bed Access Pt
Addressed Structures
Railroad
Highway
City Limits
Name
Routine Landscape Maint
Fire-break Management Area
Areas where Brush was Cleared
Feet
270 135 0 270
Last updated on Tue, Sep 15, 2020 by jlegato.

Exhibit 7: 2019 and 2020 Impacts Quantification Table

Salinas River Parameters	2019	2020
Start date, end date, and number of days of clearance activities	Start: August 21, 2019 End: September 30, 2019 Number of work days: 23	Start: June 22, 2020 End: August 30, 2020 Number of work days: 38
Method used for each work period	Masticator/brush clearing; mowing; string-trimming/weed whipping; chipping in place	Masticator/brush clearing; mowing; string-trimming/weed whipping; chipping in place; grazing
Total work area for vegetation management	64 acres	102 acres
Total work area for sediment removal, if any	none	none
Total volume of sediment removed, if any	none	none
Area of riparian vegetation trimmed within the low-flow channel	none	none
Area of tree and shrub canopy trimmed within the active channel	none	
Area of tree and shrub canopy trimmed within the floodplain above the active channel	Cumulative 2019-20: 10.5 acres	
Number and size of trees over 4 inches dbh removed, if any	none	none
Number of animals incidentally taken, if any, by species	none	none
Area of disturbance to aquatic habitats, if any	none	none
Area of disturbance to habitat within 50 feet of water or wetted channel	none	none
Area of invasive plants removed	Cumulative 2019-20: 1.4 acres	

Quantification of 2019 and 2020 Impacts

Salinas River Parameters	2019	2020
Estimate of net biomass removed from active flow channel, if any	none	none
Estimate of net biomass removed from Salinas River riparian area and its floodplain, if any	none	none

Exhibit 8: Mitigation Receiver Site Selection

Mitigation Receiver Sites

The City proposes potential mitigation receiver sites to fulfill mitigation required for stormwater and vegetation management in riparian zones. As discussed previously, the City is in the process of developing its Paso Robles Watershed Plan (The Plan). The plan is the City's attempt to add greater flexibility to apply the Central Coast Regional Water Quality Control Board Post-Construction requirements for off-site mitigation of stormwater. As a result, 25 separate off-site locations were identified. Initially, the City planned to use this list as a list of potential mitigation receiver sites for the purpose of mitigating impacts from work within the Salinas River. The difficulty with providing the list is that the 25 off-site mitigation locations have not yet been evaluated for appropriateness and for meting mitigation requirements. As such, the City would like to propose a criteria-based selection process for mitigation receiver sites. The selection will be based on 4 different criteria that focus on habitat functionality rather than like for like replacement. The following criteria

1. **Proximity to Waterbody:** Mitigation sites will be based on treatment potential and its proximity to the waterbody. The City has multiple tributaries to Salinas River that offer a high potential for revegetation, bank stabilization, and overall rehabilitation for urbanized waterways. A site that can demonstrate a higher ability to accept revegetation associated with a channel will have a higher score:

Proximity to Waterbody (feet)[1]	Scoring
0 to 20	4
21 to 39	3
40 to 50	2
Greater than 50	1

1-Ability to implement a mitigation project proximity to the waterbody, wetted channel, dry channel, etc. Mitigation project may include revegetation, bank stabilization, wetland establishment, flood control, etc.

2. **Vegetation Type/Function:** Mitigation sites will be assessed for ability to accept similar vegetation type or vegetation function (shading, habitat for nesting, velocity control, water quality treatment, etc.). The following table demonstrates the assessment and scoring to determine optimal locations.

Vegetation Parameter	Scoring
Vegetation Function[1]	4
Vegetation Type[2]	3
Vegetation Replacement[3]	2
Revegetation Planting[4]	1

1 – Vegetation function meets or achieves a functional equivalent for sediment removal, habitat improvements, velocity control, and/or water quality treatment.

2 – Vegetation species match removed vegetation and have similar function, e.g., canopy for bird nesting, habitat shading, shelter, and/or food resources. These plant species may include trees, shrubs, etc.

3 – Vegetation Replacement of like for like vegetation that has been impacted. The City plans to align the California Department of Fish and Wildlife requirements, which prescribe a 3:1 replacement ratio for riparian trees and shrubs that are damaged or removed with a four (4) inches DBH or greater.

4 – Vegetation planting does not match impacted habitat with respect to vegetation type, species, or function.

3. **Overall Improvements to Water Quality:** Mitigation sites will be selected using a water quality function parameter such as sediment removal, shading, velocity reduction, pollutant removal, etc. These water quality parameters are only weighted higher if the existing conditions of the received site would benefit from implementation of a targeted functional improvement. This selection process will be done subjectively depending on the needs of the receiver site. For example, if the receiver site conditions indicate that significant scouring erosion is occurring due to a lack of bank stabilization, then the City will identify a combination of stabilization methods, such as planting, erosion control blankets, seeding, etc.

Water Quality Purpose	Score
Mitigation receiver site improves water quality to existing waterways	2
Mitigation receiver site does not significantly improve water quality to existing waterways	1

4. **Watershed Nexus:** The City will select locations that benefit overall watershed health. Overall watershed health includes, but is not limited to a combination of groundwater replenishment, water quality improvements, and/or habitat improvements. The City is currently working with the Upper Salinas-Las Tablas Resources Conservation district (RCD) to develop a process and plan to identify off site mitigation receiver sites. Since the local RCD connects with multiple landowners within the immediate area the opportunity exists to look outside City boundaries. In addition, the City would like to consider that since watershed boundaries do not align with the City's jurisdictional boundaries, mitigation sites outside of City boundaries should be considered. Mitigation sites located outside of City boundaries will still be the burden of the City to achieve long term success. This could be done through a cooperative agreement with the landowner and the RCD. However, these, details have not been defined at this time.

Watershed[1] Nexus	Score
Within the Watershed boundaries	2
Outside the Watershed boundaries	1

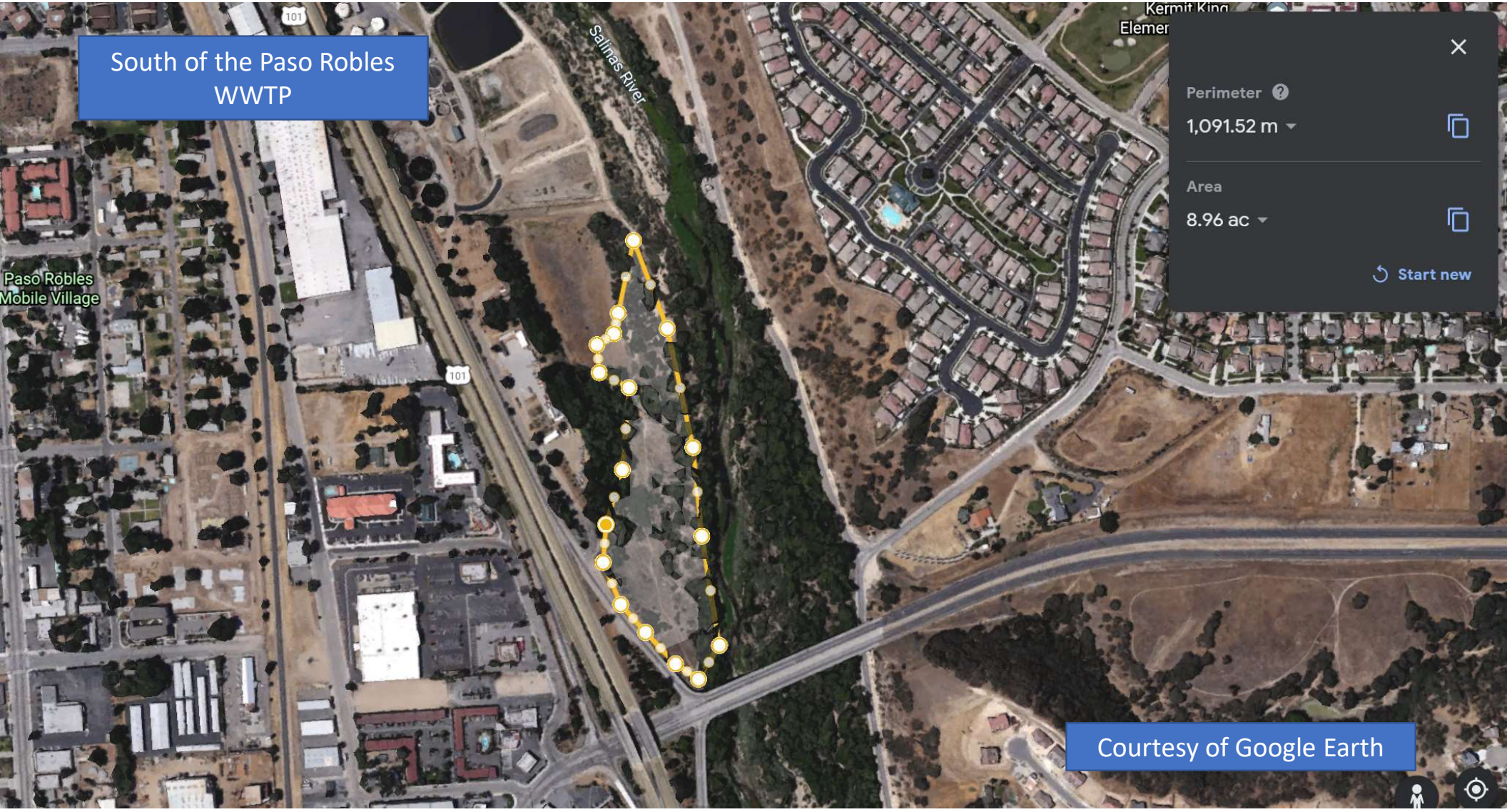
1 – Watershed boundaries may be defined by topography or existing watershed delineations, such as USGS HUC 10 boundaries.

Timeline (cumulative impacts): If sufficient area is available at one location, the City suggests implementing one mitigation project for all impacts over a 5-year period. As opposed to multiple mitigation receiver sites, implementation of a single site mitigation project would allow for greater efficiency for monitoring, mitigation costs, and adaptive management to achieve water quality goals at the mitigation site.

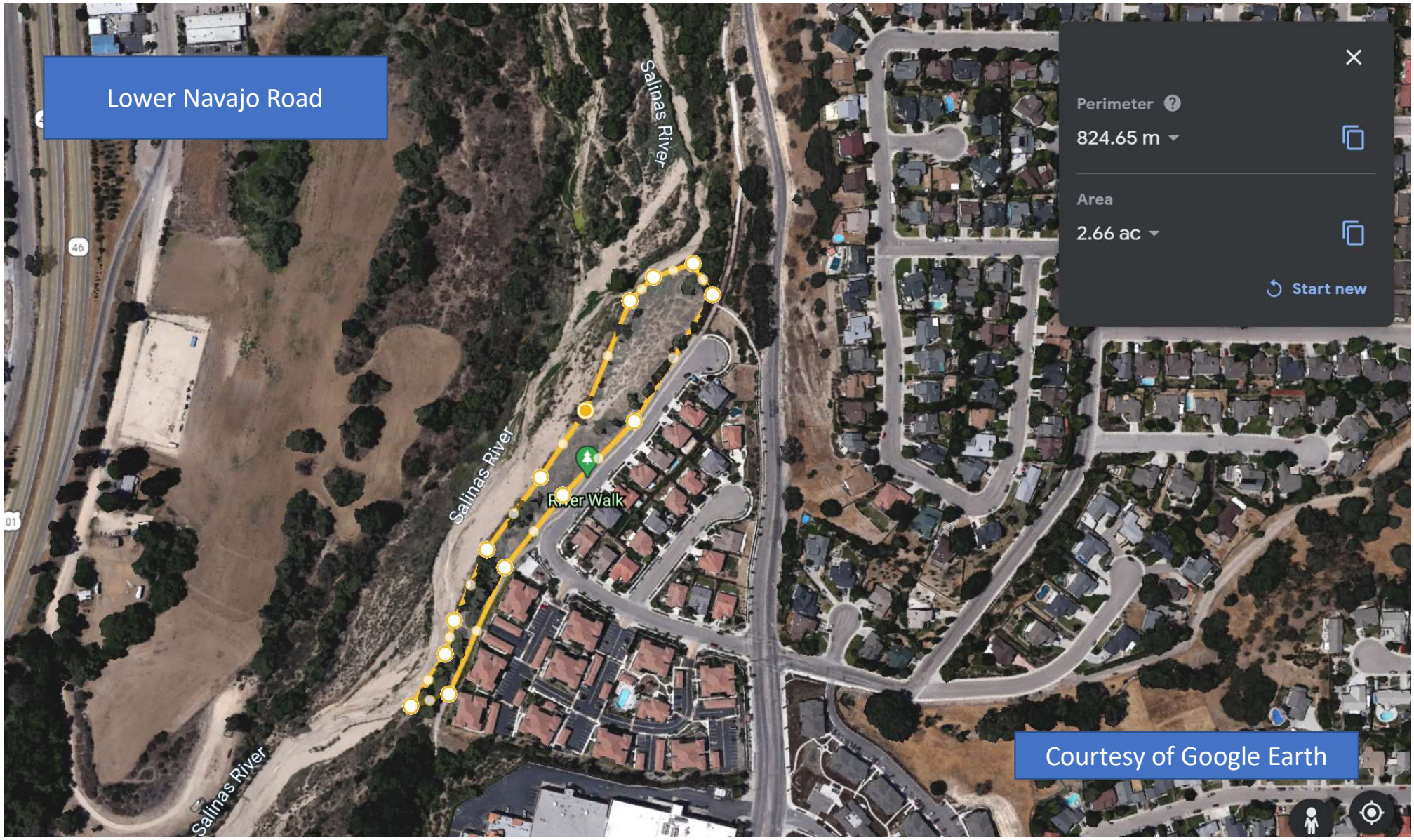
Exhibit 9: Mitigation Sites Preliminary Evaluation

Preliminary Evaluation of Mitigation Receiver Sites, Paso Robles

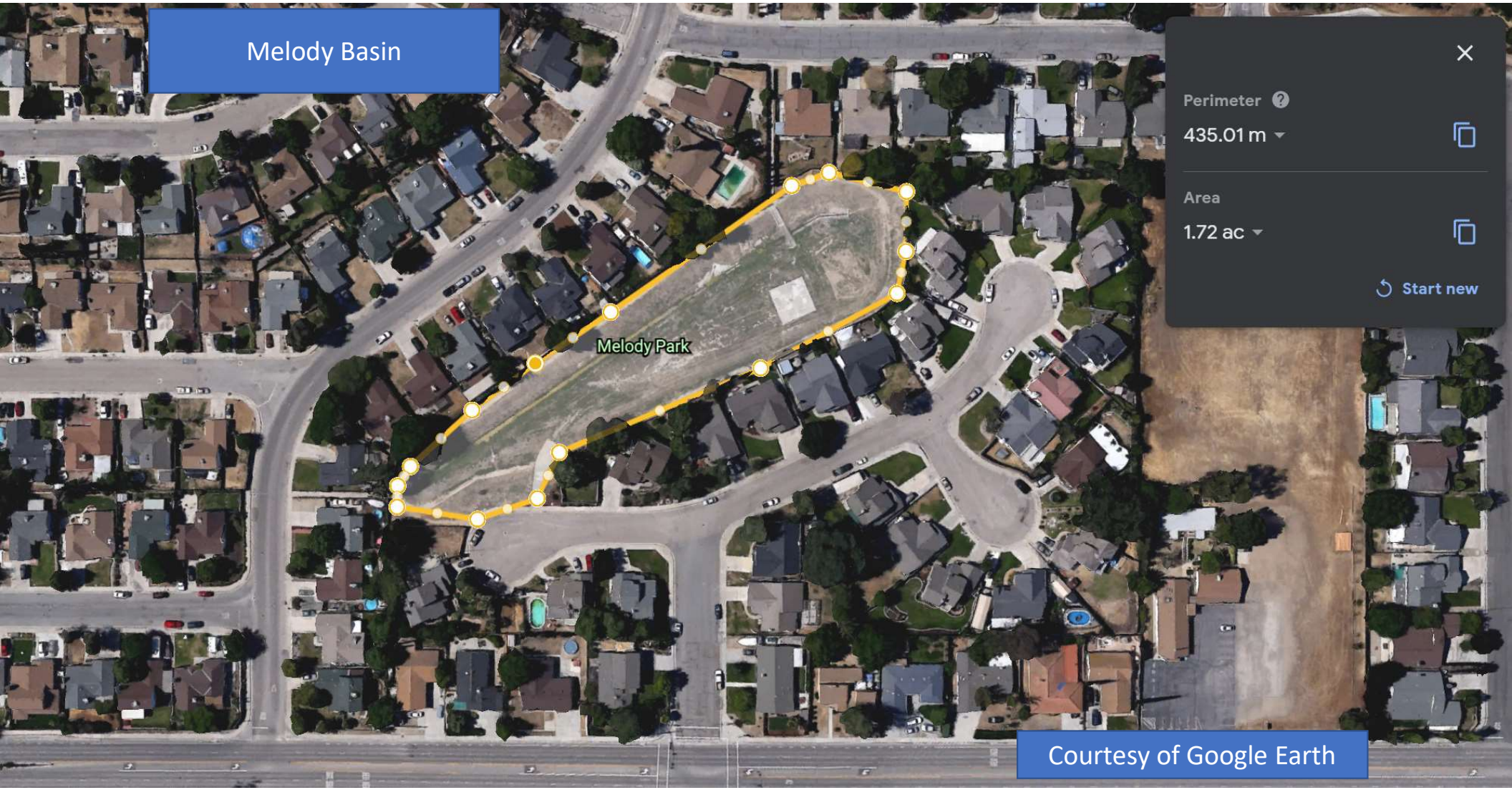
- The following figures include potential receiver site locations and their associated areas of coverage.
- The sites listed are a small selection of areas suitable for mitigation.
- The receiver site scoring rubric was used to evaluate and score each site depending on its characteristic of suitability.
- It should be noted that this is a preliminary evaluation; therefore, polygons are estimates and demonstrate the general location.

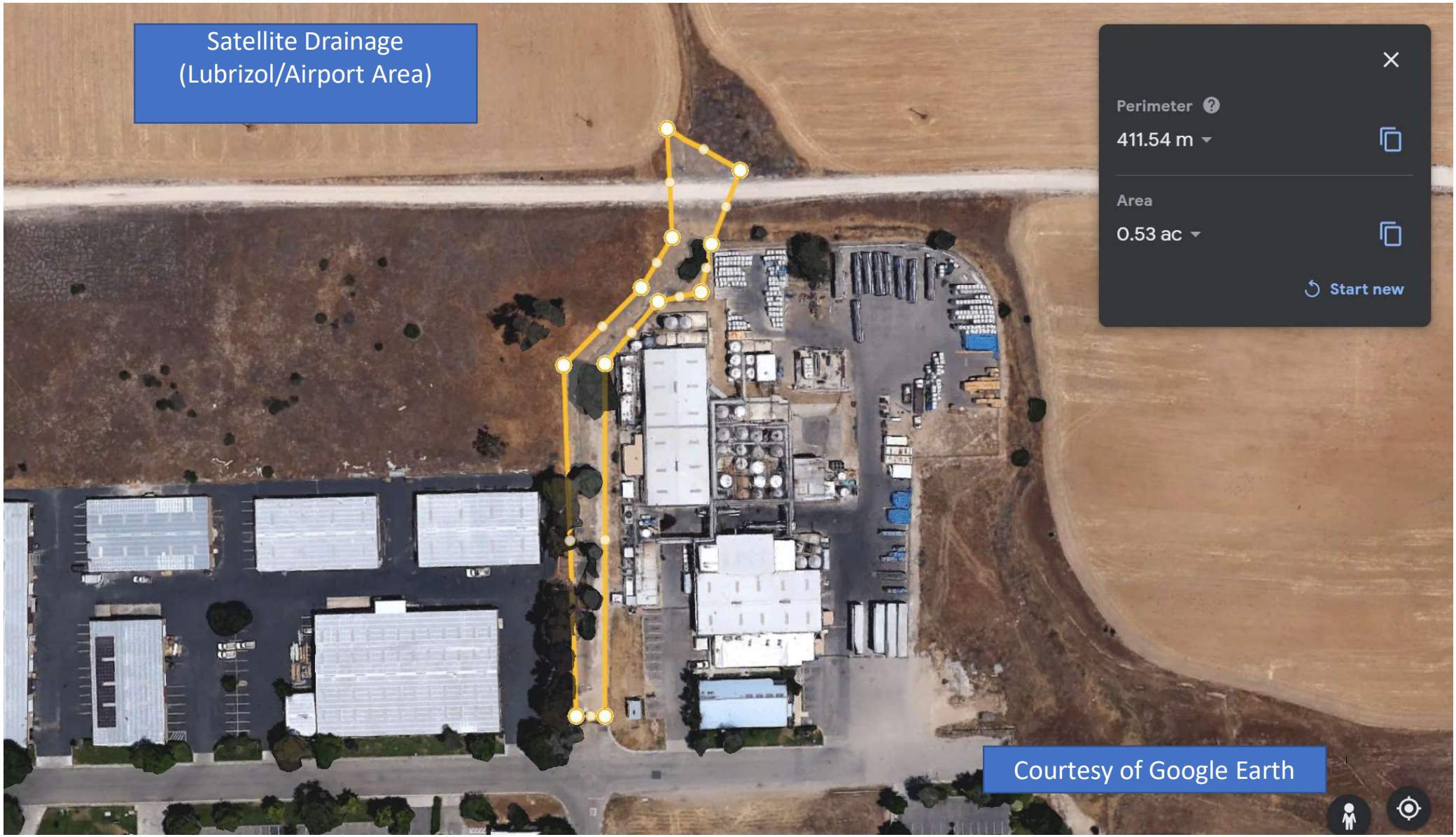

South of the Paso Robles WWTP
Salinas River
Paso Robles Mobile Village
101
Perimeter
1,091.52 m
Area
8.96 ac
Start new
Courtesy of Google Earth


Southeast of 13th Street Bridge (Old Burn Site)
Perimeter
686.33 m
Area
2.84 ac
Start new
North Coast Engineering, Inc
St. Rose of Lim
Catholic Churc
Salinas River
101
Courtesy of Google Earth


Lower Navajo Road
Salinas River
Salinas River
Salinas River
River Walk
Perimeter
824.65 m
Area
2.66 ac
Start new
Courtesy of Google Earth


Niblick Bridge (Old Burn Site)
Salinas River Walk
Salinas River
Salinas River
Perimeter
1,273.77 m
Area
5.91 ac
Start new
Kennedy Club Fitness
Courtesy of Google Earth
3D


Melody Basin
Melody Park
Perimeter
435.01 m
Area
1.72 ac
Start new
Courtesy of Google Earth


Satellite Drainage
(Lubrizol/Airport Area)
Perimeter
411.54 m
Area
0.53 ac
Start new
Courtesy of Google Earth

Receiver Site Scoring Matrix

Receiver Site Location	Riparian River Location	Vegetation Parameter	Water Quality Purpose	Watershed Nexus	Total Score
South WWTP	2	3	1	2	8
13th Street Bridge	3	3	2	2	10
Navajo Road	2	3	2	2	10
Niblick Bridge	3	3	2	2	10
Melody Basin	1	1	1	1	4
Satellite Drainage	4	3	2	1	10

**Secondary factors associated with receiver site feasibility include water availability, land ownership, environmental permit, location accessibly.

Exhibit 10: Section 7 of the Annual Flood Control and Fire Fuel Reduction Project, Report of Waste Discharge, Supplemental Information Report

7 HABITAT RESTORATION AND ENHANCEMENT

Mitigation sites will be located on City property and/or properties protected from development in perpetuity, and will be located along the Salinas River, its floodplain, and/or its tributaries. Sites may also be identified based on accessibility and availability of purple-pipe water. Mitigation sites may be planted with new native trees, shrubs, and forbs as part of habitat restoration. In addition, native seedlings and saplings already growing in mitigation areas may be protected in place from herbivory and/or have weeds reduced around them; this would provide habitat enhancement.

Potential habitat restoration and enhancement areas overlap some of the areas treated for invasive species removal. Native trees, shrubs, and forbs may be planted in areas where invasive species are removed. Areas with low tree cover on the floodplain may be restored to include oak woodland and riparian species, as appropriate. Tributary drainages within and adjacent to the City of Paso Robles may be restored with native trees and shrubs. The City of Paso Robles Fire Department will be consulted on mitigation receiver locations, restoration species, and protected-in-place trees and shrubs to ensure that habitat restoration and enhancement does not contribute to fire risk and would not need to be removed in the future.

Habitat mitigation will improve native habitat structure, improve vegetation cover quality, and improve structural and age diversity. It will also increase habitat for native wildlife, including habitat for nesting birds.

7.1 Maintenance and Monitoring

Maintain mitigation site and monitor for problems according to the maintenance and monitoring schedule (Table 6), or until the primary performance standards are achieved, whichever is longer. The restoration ecologist may reduce maintenance and monitoring visits quarterly in Years 3 through 5 if weed management is under control and more frequent visits are not necessary. The installation/maintenance contractor(s) will complete maintenance requests from the restoration ecologist within 14 days of any written request or monitoring report.

TABLE 6. MAINTENANCE AND MONITORING SCHEDULE

Reporting	Maintenance and Monitoring Activities
Year 1	Monthly maintenance and monitoring, weekly monitoring during installation.
Year 2	Quarterly maintenance and monitoring
Year 3	Quarterly maintenance and monitoring
Year 4	Quarterly maintenance and monitoring
Year 5	Quarterly maintenance and monitoring

7.1.1 Maintenance Plan

The mitigation site shall be maintained regularly by the contract landscapers with oversight from City representatives and the restoration ecologist. Mitigation sites shall be inspected to evaluate the establishment of planted trees from year to year and to provide weed abatement, supplemental planting, and modifications as needed. The contract landscaper will consult with the restoration

ecologist to solve problems as they arise. The contract landscaper shall be responsible for controlling non-native plant species, irrigation, trash, and signs described by the following:

1. Non-native plant control

a. **Hand Crews**. Herbaceous vegetation within the mitigation sites will require weeding to promote native species dominance and to reduce plant species competition for resources. Vegetation management will primarily consist of manual weeding techniques with oversight by a qualified restoration ecologist. Mechanical weeding (i.e., weed whacking) may be used during appropriate times of year if approved by the restoration ecologist. Herbicides or similar methods may be required to address large weed infestations that may recruit into the mitigation site. Most herbicides are restricted within wetland areas and require a setback from waterways. Wetland herbicides are acceptable if approved by the restoration ecologist and are applied at the appropriate times of year (i.e., during the dry season). Herbicides may not be used within the critical root zone (CRZ) of oak and mitigation trees.

   Trimming of tree and shrub canopy in the mitigation site would trigger 0.5:1 mitigation ratio following the mitigation requirements described in the Order #40(c), which states:

   Mitigation shall be implemented [for] rehabilitation or enhancement implemented within the Salinas River channel where future fire fuel load reduction will be managed by grazing for control of grasses only, minimum required rehabilitation or enhancement to impact ratio for the impacts categorized as trimming of tree and shrub canopy within the floodplain is 0.5:1.

b. **Grazing**. Livestock grazing may be allowed in the mitigation site during the 5-year monitoring period with implementation of protective measures approved by City representative and restoration ecologist that will ensure oak and mitigation tree survival and to avoid grazing on immature oaks or saplings. Protective measures may include electric fencing or other deer browse protection installed around planted oaks and mitigation trees. Livestock grazing may be used to address invasive weed infestations or as a fuel reduction measure if thatch or other build up is noted in the Annual Work Plan. Grazing must be timed appropriately to avoid disturbing the mitigation site, and during periods where target species are most palatable to livestock. Grazing management techniques within the mitigation site will require prior approval from City representatives in coordination with the restoration ecologist or a rangeland manager.

2. **Irrigation**

a. Check irrigation system regularly for proper function. Repair any leaks, plugged emitters, or other problems. Adjust watering schedule as needed to ensure survival.

b. Provide irrigation to container-stock during Years 1 through 3 from April through October, and during any month from November to March with below-normal precipitation. Irrigation will be reduced during winter months depending on rainfall. If irrigation is provided, it will be adjusted annually to taper watering by Year 3, or until no supplemental irrigation is required.

c. If needed, supplemental water will be brought in from a water truck for hand watering and container plants/live stakes will be seasonally timed to coincide with forecasted rain as appropriate.

3. **Trash**. All trash and debris that accumulates in the mitigation site will be removed regularly (on a monthly basis or quarterly basis, at minimum) and disposed of properly as part of ongoing maintenance.
4. **Signs**. Signage may be used to keep the mitigation site clear of public use. Language used on signs may state "Riparian Conservation Area Please Do Not Disturb," or something to the like. Signs may include background information on sensitive resources within the mitigation site for viewers to learn about their environment and understand the need to protect natural resources. Signage can be developed with the restoration ecologist or qualified biologists to help promote community awareness of the importance of conservation. Weathered, degraded, or vandalized signs shall be repaired or replaced as needed for continued protection of the mitigation site.

7.1.2 Monitoring Plan

Monitoring will be conducted weekly during the installation phase and monthly for the rest of the year, quarterly during Year 2 and thereafter. The mitigation site shall be monitored until the primary performance standard is achieved (refer to Section 4.0).

1. Establish photo points at each mitigation site immediately after installation is complete. Take photographs from each photo point to document revegetation success.
2. Monitor sites monthly for survival during Year 1 and quarterly during years 2 through 5
3. At the end of each monitoring year, count all surviving trees and live stakes planted for this project in mitigation site and compare results to target survival rates.

7.2 Performance Standards

Results of annual monitoring activities would be compared to success criteria presented in Table 7. An overall goal of 70 percent survival of container stock and live stakes is proposed by the end of Year 5. The survival rate of mitigation plants is the primary performance standard for this project. Success rates that are below the stated minimum target for each criterion indicate the need for additional revegetation, plant protection, irrigation, or non-native plant removal. An adaptive management strategy for failure to meet the performance standards will be provided in the Annual Reports (Section 8.2).

TABLE 7. SUCCESS CRITERIA

Feature	Success Criteria	Assessment Method	Success Criteria by Monitoring Year				
			Year 1	Year 2	Year 3	Year 4	Year 5
Tree and shrub container stock (mitigation site)	Percent survival	Count surviving plants at each site	70%	70%	70%	70%	70%
Live stakes (project and mitigation site)	Percent survival	Count surviving live stakes at each site	70%	70%	70%	70%	70%

Exhibit 11: Revegetation Plan for Annual Flood Control and Fire Fuel Load Reduction Project

Revegetation Plan

for

Annual Flood Control and Fire Fuel Load Reduction Project
Order No. R3-2021-0012

City of Paso Robles, San Luis Obispo County

Prepared for

City of El Paso de Robles
Department of Public Works
c/o David LaCaro
1000 Spring Street
Paso Robles, CA 93446

by

ALTHOUSE AND MEADE, INC.
BIOLOGICAL AND ENVIRONMENTAL SERVICES
1650 Ramada Drive, Suite 180
Paso Robles, CA 93446
(805) 237-9626

~~**December 2023**~~ **Revised April 2024**

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Cover photo: East of secondary channel of Salinas River riparian corridor south of 13th Street, west of River Walk Trail and S. River Road after grazing activities, June 22, 2023.

1 INTRODUCTION

In 2021 the City of Paso Robles (City) obtained Order No. R3-2021-0012 (Order) with the Regional Water Quality Control Board (RWQCB) to conduct annual vegetation maintenance activities for flood control and fire fuel load reduction purposes throughout the City (Attachment A). Consistent with the mitigation measures prescribed in the Order, this Revegetation Plan (Plan) has been prepared to the satisfaction of the RWQCB for riparian habitat mitigation related to the City's Annual Flood Control and Fire Fuel Load Reduction (Project).

This Plan provides the final selected mitigation site pursuant to **Order #41** (page 21) and describes an environmental baseline, work plan, performance standards, and reporting requirements over the course of five years. Any unmet performance standards would be re-evaluated, and adaptive management strategies would be implemented until the performance standards are achieved.

Table 1 identifies Project contact information.

TABLE 1. CONTACT INFORMATION

City Representatives	
City of Paso Robles, Department of Public Works c/o David LaCaro 1000 Spring Street Paso Robles, CA 93446 805-237-3865 Dlacaro@prcity.com	City of Paso Robles Fire Department c/o Jay Enns and Paul Patti 900 Park Street Paso Robles, CA 93446 805-227-75605 jenns@prcity.com, Ppatti@prcity.com
Biological Consultant	**Responsible Agency**
Althouse & Meade, Inc. c/o Valerie Mattos 1650 Ramada Dr., Ste.180 Paso Robles, CA 93446 (805) 237-9626 Valeriem@althouseandmeade.com	Central Coast RWQCB c/o Kathleen Hicks 895 Aerovista Pl, Ste 101 SLO, CA 93401 (805) 549-3458 Kathleen.hicks@waterboards.ca.gov

1.1 Project Summary

The Project includes maintenance activities that take place annually from April 15 to October 14 for flood control and fire fuel load reduction purposes within permitted maintenance locations summarized by the following:

1. The **flood control component** consists of manual vegetation treatment, and mechanical and manual sediment removal, which will enhance channel capacity and stormwater flow in 21 locations throughout the City of Paso Robles.
2. The **fire fuel load reduction component** consists of mechanical and manual vegetation treatment, low-intensity prescribed burns, and livestock grazing, to reduce hazardous fire fuels within the Salinas River stream extent in the City of Paso Robles.

1.2 Mitigation Site Locations and Plan Purpose

The mitigation site is within the City of Paso Robles, California on City-owned property in the Paso Robles United States Geological Survey (USGS) 7.5-minute topographic quadrangle (Figure 1). For annual flood control the selected mitigation site is Franklin Creek. For fire fuel load reduction the selected mitigation site is within the Salinas River riparian corridor, south of 13th Street bridge. Alternative mitigation sites were provided in Exhibit 9 of the Order. The selected mitigation site was chosen primarily because it has existing irrigation lines along the existing pathway. Other reasons are because the site burned previously/is disturbed/exposed, the site is contiguous and adjacent to the Salinas River, and the site is not surrounded by private landholdings. Pursuant to the Order, mitigation shall be implemented according to specified ratios outlined in **Order #40a- f** (page 21), further described in the following sub-sections.

1.2.1 Franklin Creek

One red willow tree greater than 4-inches diameter breast height (DBH) was removed in 2022 because it was compromising and in front of a box culvert, causing the area in front of the culvert to erode. Cuttings were harvested and planted in the Franklin Creek area, north of Sleepy Hollow Road and south of Alamo Creek Terrace (Figure 2). Althouse and Meade, Inc. (A&M) will continue to monitor planted cuttings/saplings and if needed will replant new cuttings, in-kind, and within the same drainage feature; per the requirement in **Order #40e** (page 21), which states:

> *Mitigation shall be implemented according to the following ratios … [the] Discharger shall mitigate for the removal of native trees or shrubs four inches or greater in diameter at breast height by replacing in kind at a 3:1 ratio.*

1.2.2 Salinas River Riparian Corridor

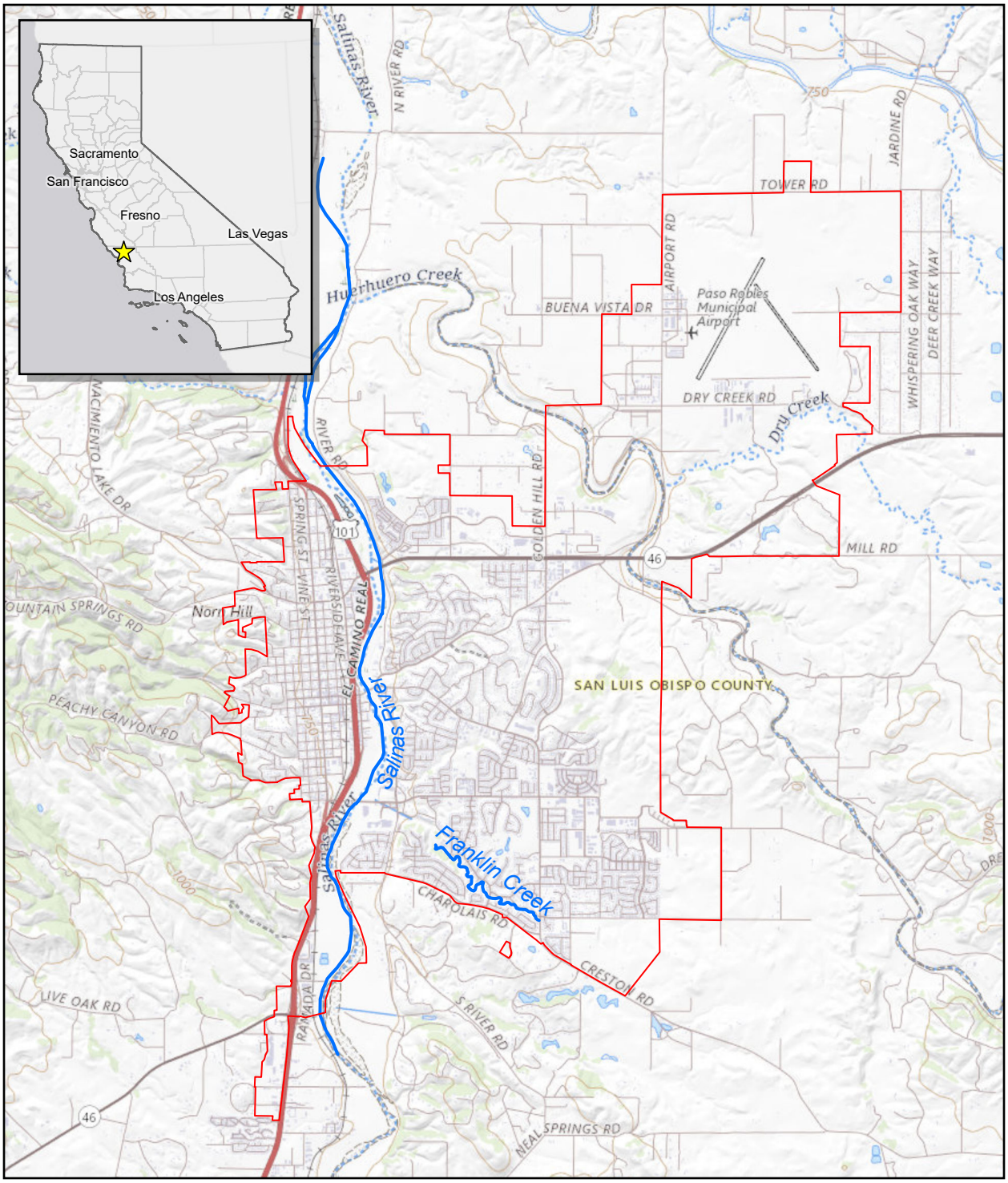
Table 2 provides an impact and mitigation summary for each year fuel reduction activities took place within the Salinas River corridor, from 2019 through 2023. As shown, the amount of mitigation required is based on prescribed mitigation ratios and credit totaling 4.65 acres. The selected mitigation site is east of a secondary channel along the Salinas River riparian corridor, south of 13th Street, west of River Walk Trail and S. River Road (Figure 3).

TABLE 2. CUMULATIVE IMPACT AND MITIGATION SUMMARY

Year	Vegetation Impacts (ac.)	Mitigation Ratio	Mitigation Req'd (ac.)
2019-2020	10.50	0.5:1	5.25
2021	0.00	--	0.00
2022	0.03	0.5:1	*0.02
2023	0.00	--	0.00
Sub-Total	**10.93**		**5.27**
Trash removal credit, Order #39.		2022	** -0.50
Not to exceed 25% of 5.27 acres (=1.32 acres)		2023	-0.12
~~Tree of heaven removal~~		~~2023~~	~~-0.05~~
TOTAL			**4.65**

*0.015-acre rounded to 0.02-acre
**0.50-acre of trash removed in the low flow/active channel (2022; Figure 4).
0.12-acre of trash was removed in low-flow/active channel (2023; Figure 4).

Figure 1. United States Geological Survey Topographic Map



Legend

City of Paso Robles — State Jurisdictional Waterway

N

0 1 2 Miles

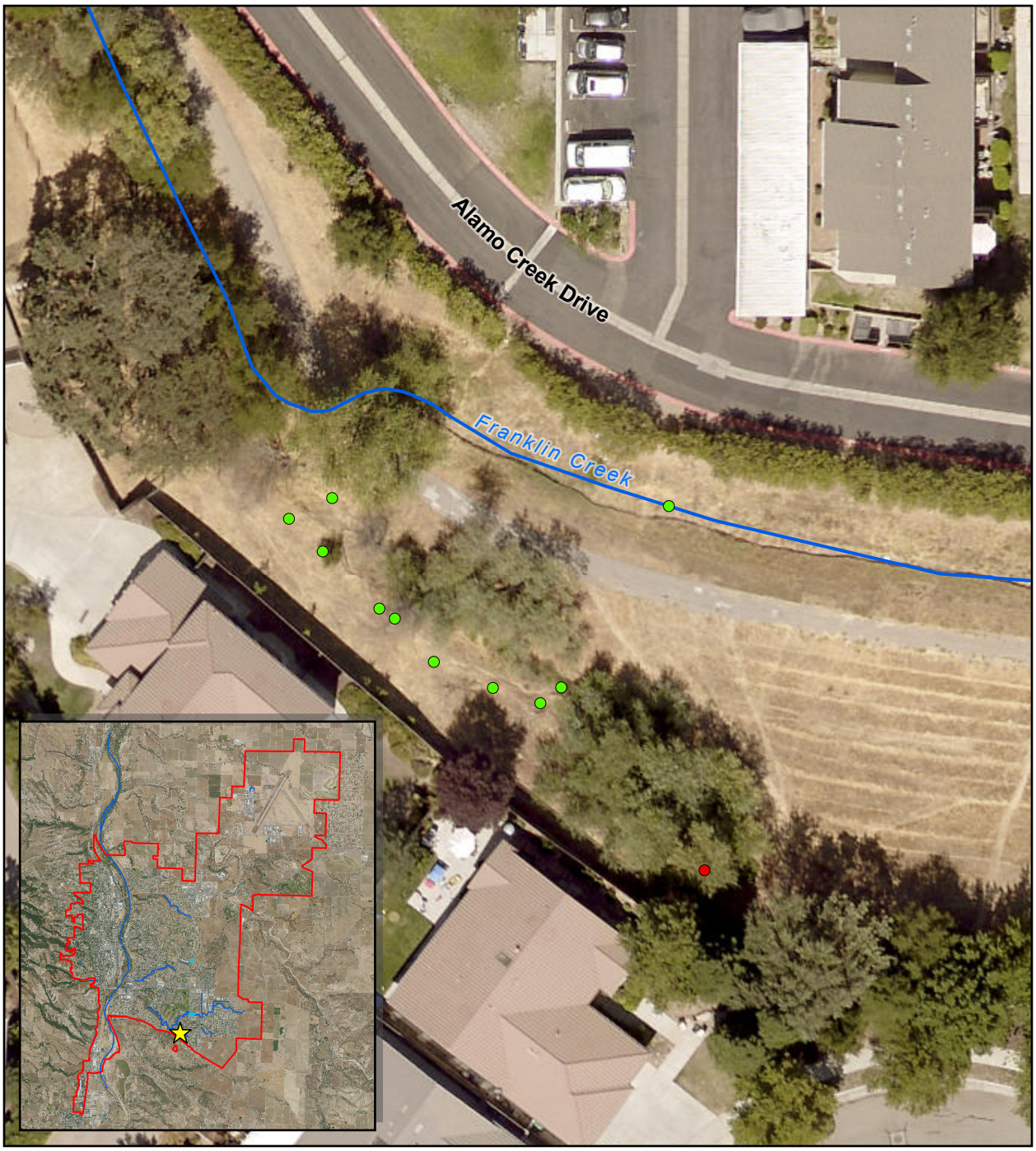
City of Paso Robles
Revegetation Plan for Annual Flood Control and Fire Fuel Load Reduction Project
Map Center: 120.6643°W 35.64047°N
Paso Robles, San Luis Obispo County

USGS Quadrangle: Paso Robles and Templeton

ALTHOUSE AND MEADE, INC.
BIOLOGICAL AND ENVIRONMENTAL SERVICES

Map Updated:
November 07, 2023 02:11 PM by SAF

Figure 2. Flood Control Mitigation Site



Legend

- Revegetation Site Location
- City of Paso Robles
- State Jurisdictional Basin
- State Jurisdictional Waterway
- Red Willow Cuttings
- Red willow (*Salix laevigata*) Removed

N

0 25 50 Feet

City of Paso Robles
Revegetation Plan for Annual Flood Control and Fire Fuel Load Reduction Project
Map Center: 120.66222°W 35.60216°N
Paso Robles, San Luis Obispo County

Imagery Source: San Luis Obispo County, 08/23/2021

Figure 3. Fire Fuel Load Reduction Mitigation Site

Legend

Fuel Reduction Area

Revegetation Area (4.65 acres)

N

0 0.5 1 Mile

City of Paso Robles
Revegetation Plan for Annual Flood Control and Fire Fuel Load Reduction Project

Map Center: 120.68807°W 35.63413°N
Paso Robles, San Luis Obispo County

Imagery Sources: USDA NAIP, 05/13/2022, San Luis Obispo County 08/23/2021

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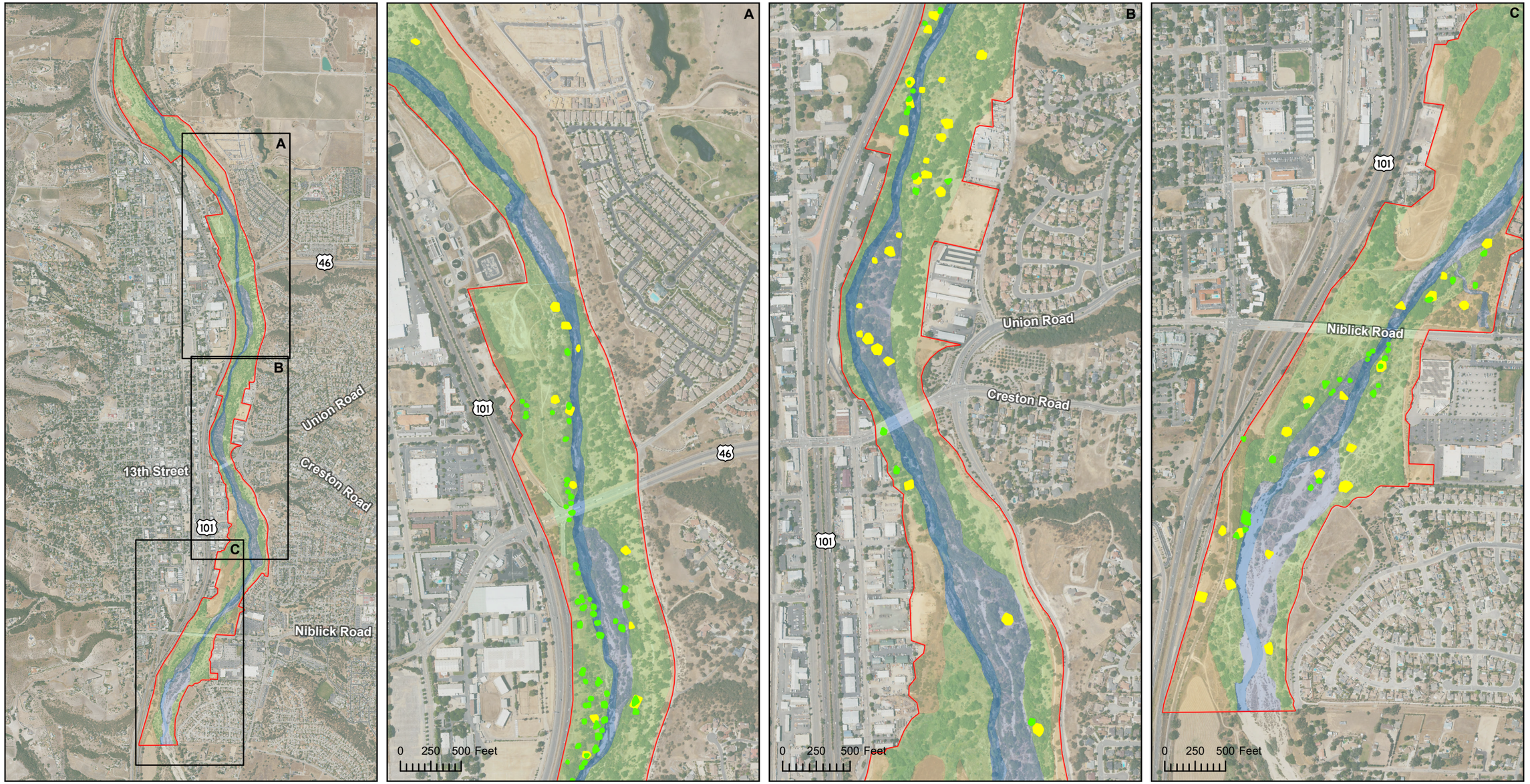
Map Updated:
April 18, 2024 08:34 AM by SAF

Figure 4. 2022 and 2023 Trash Removal Locations



Legend

Fuel Reduction Area
2022 Trash Removal Sites (2.2 acres)
2023 Trash Removal Sites (1.0 acre)
Channel
Low-Flow Channel
Floodplain
Upland

N

0 0.5 1 Mile

City of Paso Robles
Revegetation Plan for Annual Flood Control and Fire Fuel Load Reduction Project
Map Center: 120.68805°W 35.63412°N
Paso Robles, San Luis Obispo County

Imagery Source: USDA NAIP, 05/13/2022

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Map Updated:
January 10, 2024 03:18 PM by SAF

1. **Year 2019-2020**

   a. Impacts to 10.5 acres of tree and riparian canopy for 2019 and 2020 emergency vegetation management work is prescribed in **Order #26** (page 9) which states:

   During 2019 and 2020, the Discharger conducted unauthorized emergency vegetation management work for fire fuel load reduction in the Salinas River channel and floodplain. Mitigation for the impacts to beneficial uses resulting from this work is also required by this order. These impacts are quantified in the 2019 and 2020 impacts Quantification Table, Exhibit 7. In 2019, 64 acres of total work area were impacted in 2020, 102 acres of total work area were impacted. Cumulative impacts to tree and riparian canopy for 2019 and 2020 combined was 10.5 acres. Mitigation for impacts from the 2019 and 2020 emergency work is required by this order, according to the mitigation ratios specified herein. The Discharger is required to mitigate for impacts only once for impacts occurring until 2025. Repeat maintenance activities that occur within the footprint of previous maintenance activities of the same type do no require additional mitigation, provided that mitigation was provided for the initial impact.

   b. Mitigation for 10.5 acres of tree and riparian canopy impacts for emergency work in 2019 and 2020 is at a 0.5:1 mitigation ratio (determined in **Order #40c**, page 21), which states:

   Mitigation shall be implemented [for] rehabilitation or enhancement implemented within the Salinas River channel where future fire fuel load reduction will be managed by grazing for control of grasses only, minimum required rehabilitation or enhancement to impact ratio for the impacts categorized as trimming of tree and shrub canopy within the floodplain is 0.5:1.

2. **Year 2021** - No impact; vegetation maintenance activities included livestock grazing of annual grasses and weedy forbs followed by vegetation trimming by hand crews. No live canopy trees or shrubs were removed over 4 inches DBH.

3. **Year 2022**

   a. Impacts to 0.03-acre of tree and riparian canopy occurred in 2022, where hand crews incidentally removed box elder trees (*Acer negundo*).

   b. Mitigation for approximately 0.03-acre of tree and riparian canopy impacts in 2022 is a 0.5:1 mitigation ratio (determined in **Order #40b**, page 20) for non-recurring, incidental impact) which states:

   Mitigation shall be implemented [for] rehabilitation or enhancement implemented in areas that will not be subject to future fire fuel load reduction activities the minimum required rehabilitation or enhancement mitigation to impact ratio for the impacts categorized as trimming of tree and shrub canopy within the floodplain is 0.5:1.

   c. Trash removal activities took place in 2022, where approximately 2.2 acres of trash was removed along the Salinas River corridor, with 0.50-acre in the low flow/active channel. Equal mitigation credit would be received for the amount of trash removed (in acres), where mitigation credit received for the amount of trash removed in the low flow/active channel is 1:1. The cumulative mitigation credit will not exceed 25 percent of the required mitigation total (credit not to exceed 1.32 acres), determined in **Order #39** (page 20), which states:

Mitigation [credit] shall be achieved by a combination of removal of non-native vegetation, removal of trash, and habitat rehabilitation and enhancement. Removal of trash must occur from within the low-flow and active channel to count towards mitigation and may only compose a maximum of 25 percent of the required mitigation area. Mitigation shall achieve success criteria described in the Mitigation Plan for the fifth year following mitigation installation. If mitigation measures do not meet their interim or final success criteria, the discharger shall implement remedial measures until such time the interim or final success criteria are met.

4. **Year 2023** – No impact; vegetation maintenance activities included removal of dead and down woody material contributed by the flows from January 2023 storms and grazing of domestic goats and/or sheep. No standing trees or brush were targeted for removal and no live canopy trees or shrubs were removed over 4 inches DBH.

   a. Trash removal activities took place in 2023 along the Salinas River corridor and within the low flow channel, ~~;~~ where approximately 1.0 acre of trash was removed along the Salinas River corridor, with 0.12-acre in the low flow/active channel.~~however the data is not yet received~~. ~~The total acres accounted for as mitigation has not accounted for this 2023 credit.~~

   ~~b. Additionally, a small area of tree of heaven (*Ailanthus altissima*) was removed west of the Salinas River at the eastern terminus of 11th Street, accounting for approximately 0.05 acre of non-native vegetation removal credit (Figure 5; Table 2), prescribed in **Order #39** (page 20; cited above in italics).~~

~~**FIGURE 5. TREE OF HEAVEN REMOVAL LOCATION**~~

2 EXISTING CONDITIONS

2.1 Franklin Creek

An unnamed, intermittent tributary to the Salinas River locally referred to as Franklin Creek is within a watershed encompassing much of the southeastern portion of the City limits. Franklin Creek meanders through an oak woodland surrounded by blue and coast live oaks (*Quercus douglasii, Q. agrifolia*). Annual grasses, western poison oak (*Toxicodendron diversilobum*), red willow (*Salix laevigata*), and Fremont cottonwood (*Populus fremontii*) occur closer to the channel along the bed and bank. However, the bed is mostly unvegetated, with sand, cobble, rocks and debris with occasional coyote brush (*Baccharis pilularis* subsp. *consanguinea*), cocklebur (*Xanthium strumarium*), narrowleaf milkweed (*Asclepias fascicularis*), and *Phlaris* sp. growing in and around the channel bottom. Franklin Creek has a defined bed and bank that ranges from narrow and channelized (less than 10 feet wide), to over 20 feet wide.

2.2 Salinas River Riparian Corridor

The Salinas River corridor extends approximately 22,100 feet from the south end of Larry Moore Park at the south end of Riverbank Lane up to approximately 1.4 miles north of the Highway 46 bridge. The portion of the Salinas River that flows through Paso Robles is characterized by several stretches of braided channel, where smaller channels are divided by vegetated islands. The river flows annually. In summer, surface water often recedes and the river flows underground, leaving large stretches of dry riverbed.

Mature riparian habitat occurs where overstory species are dominated by river-dwelling trees, such as Fremont cottonwood (*Populus fremontii*) and red willow (*Salix laevigata*), where the canopy is approximately 30 percent absolute cover. Midstory shrubs, such as sandbar willow (*Salix exigua*) and mulefat (*Baccharis salicifolia*) may occur under emergent trees or stand alone as the dominant vegetation. Nonnative species such as white sweetclover (*Melilotus albus*) and annual grasses occur in the understory and in the margins where established shrubs do not grow. Mature Riparian habitat typically occurs where frequent disturbance, either through human activity or strong water flow, is uncommon. Much of the Salinas River stream extent is suitable for Mature Riparian habitat and it accounts for approximately 60 percent of the mapped habitat. Many unhoused encampments and trash piles noted during surveys were located in mature riparian habitat, indicating that this habitat is disproportionately affected by activities of unhoused people living in the riverbed.

Mature riparian most closely conforms to **Fremont cottonwood forest and woodland** (*Populus fremontii-Fraxinus velutina-Salix gooddingii* Forest and Woodland Alliance; Manual California of Vegetation; Sawyer et al 2009[1]), which is described as dominated or co-dominated by Fremont cottonwood (*Populus fremontii*) in the tree canopy with a mix of other tree species such as box elder (*Acer negundo*), Northern California black walnut (*Juglans hindsii*), western sycamore (*Plantanus racemosa*), coast live oak (*Quercus agrifolia*), and willows (*Salix exigua, S. laevigata*, and *S. lasiolepis*, among others). This habitat classification is typically less than 25 meters in the tree canopy height that is continuous to open, with a shrub layer that is intermittent to open, and a herbaceous layer that is variable.

[1] Sawyer J, Keeler-Wolf T, Evens J. 2009. A manual of California vegetation. 2nd ed. Sacramento (CA): California Native Plant Society Press 1300p.

3 WORK PLAN

This Plan is targeted specifically for the mitigation site at the fire fuel load reduction component and shall be implemented in four phases: (1) plant materials and live-stake propagation, (2) site preparation, (3) site implementation, and (4) maintenance and monitoring. The following sections describe each phase.

3.1 Phase 1: Plant Materials and Live-stake Propagation

Live procurement of riparian trees, including live-stake willow cuttings will be implemented by the contracted landscape crew with oversight by the restoration ecologist and timed to propagate cuttings up to two weeks prior to live-stake planting. Container transplants and live stakes will be installed in fall or winter, to allow for winter rains to facilitate establishment. Live stakes shall be preserved in water (preferably sourced from Salinas River) to promote root growth prior to planting. Live-stake propagation will follow the protocol provided in Attachment B excerpted from the California Salmonid Stream Habitat Restoration Manual (CDFW 2003[2]).

3.2 Phase 2: Site Preparation

Pre-project photographs will be taken at the revegetation site prior to mitigation implementation. Each area will be surveyed and staked outlining the boundaries of the revegetation site. Prior to any equipment operating on mitigation sites, pre-construction surveys will be implemented to ensure avoidance of wildlife.

3.2.1 Weeding/ Non-Native Plant Removal

Weed control efforts will be timed (to the extent practicable) to avoid seed set. For weed species that have set seed, weed seed heads will be carefully placed in trash bags to prevent incidental dispersal during control efforts. Controlled grazing and/or contracted landscape workers will remove weeds using hand tools, under the supervision of a qualified restoration ecologist. Supplemental herbicide application may be utilized, if deemed necessary, following the recommendation of a California licensed pest control advisor and all federal/state regulations will be adhered to (i.e., approved for use in or within 50 feet of wetlands/waterways).

A list of potential non-native species to be targeted for removal is provided in Table 3 and includes Cal-IPC rating.

TABLE 3. TARGET NON-NATIVE PLANTS KNOWN FROM THE VICINITY OF MITIGATION SITE

Scientific Name	Common Name	Cal-IPC Rating[3]
Management Level 1 – Eradicate		
Arundo donax	Giant reed	High
Bromus madritensis subsp. *rubens*	Red brome	High
Centaurea solstitialis	Yellow star-thistle	High

[2] [CDFW] California Department of Fish and Wildlife. 2003. California Salmonid Stream Habitat Restoration Manual. Part XI Riparian Habitat Restoration. October 2003.
[3] California Invasive Plant Council (Cal-IPC) rating definitions accessed at https://www.cal-ipc.org/plants/inventory/.

Scientific Name	Common Name	Cal-IPC Rating[3]
Management Level 2 – Control		
Ailanthus altissima	Tree of heaven	Moderate
Nicotiana glauca	Tree tobacco	Moderate
Avena barbata	Slender wild oat	Moderate
Centaurea melitensis	Tocalote	Moderate
Cirsium vulgare	Bull thistle	Moderate
Conium maculatum	Poison hemlock	Moderate
Hirschfeldia incana	Summer mustard	Moderate
Management Level 3 – Manage		
Bromus hordeaceus	Soft chess brome	Limited
Polypogon monspeliensis	Annual beardgrass	Limited
Stipa miliacea var. *miliacea*	Smilo Grass	Limited
Silybum marianum	Milk thistle	Limited

Table 3 categorizes non-native plant species and dictates the level of management. Management levels include, (1) non-native plants to eradicate within the mitigation site, (2) weeds to control within the mitigation site, and (3) weeds to be managed if causing adverse habitat effects within the mitigation site. Invasive species surveys identified species designated within all three levels of management.

If trees are removed, they shall be cut at or within 6 inches of ground level and the roots shall be left in place to maintain soil stability. Cut stumps of non-native trees and giant reed shall be inspected annually in the spring or late summer for signs of re-sprouting for three years after cutting. If cut stumps are resprouting, herbicide may be used. Herbicide treatment would be reapplied in subsequent years if resprouting occurs (See Attachment C. Protocol for Non-Native Invasive Plant Removal). Herbicide use will be specified in the Annual Work Plan, prior to application. Herbicide application may only be made by a licensed herbicide applicator using materials recommended by a licensed Pest Control Advisor (PCA). Herbicides will be applied to cut stumps using a localized spot-treatment method (spraying cut stumps using a wand applicator or painting cut stumps using a brush applicator) and applied in a manner that will eliminate drift onto native plants. In all such cases, the minimum amount required to kill the target species and limit adverse effects to sensitive species and habitats will be used. Since herbicide type and amounts needed are dependent on species, site condition, weather and season, a licensed PCA will be consulted prior to herbicide use. For portions of the project that occur within 30 meters of standing water, the PCA will use herbicides approved by the Environmental Protection Agency (EPA) for use near wetlands and streams, such as the glyphosate-based Rodeo®.

3.2.2 Irrigation Plan

Recycled irrigation water (purple pipe) is not available at the mitigation site; however, an existing below ground water line with water meters are located along the paved public pathway. Waterlines may be connected to a hard pipe with a minimum schedule of 40 irrigation lines for each planting area. Water emitters may be drip, bubbler, or low-water equivalent and valves may be set close to

the roads and existing public pathway for easy access and maintenance. Although public waterlines are available, the mitigation site is susceptible to vandalism. Hand watering plants using a water truck and temporary hose is a viable alternative to water supplementation in the summer, or as needed, until the plants are established.

3.3 Phase 3: Site Implementation

Following site preparation removal efforts, native plants will be installed by the contract landscaper within the mitigation site at appropriate spacing. Container stock species are recommended in addition to live-stake planting (procured onsite). The mitigation site may be seeded to facilitate faster plant establishment and provide additional soil stabilization. Seed may be drill seeded wherever feasible, and/or hand broadcast/raked into soil within less accessible areas.

3.3.1 Ground Cover

A seed mix shall be available and applied to exposed slopes. The seed mix shall contain a minimum of three locally-native grass species and may contain one or two sterile non-native grasses not to exceed 25 percent of the total seed mix by count. Table 4 lists the proposed seed mix to be used to stabilize exposed slopes. Seeding shall be completed no later than November 15. All exposed areas where seeding is considered unsuccessful after 90 days shall receive a second application or seeding, sterile straw, or mulch as soon as is practical.

TABLE 4. SEED MIX

Scientific Name	Common Name	Lbs./acre
Wildflowers		
Lupinus bicolor	Miniature lupine	0.5
Lupinus microcarpus	Chick lupine	0.5
Lupinus nanus	Sky lupine	0.5
Trifolium gracilentum var. *gracilentum*	Pinpoint clover	0.5
Grasses		
Bromus carinatus	California brome	5
Hordeum vulgare	Dwarf barley (UC603)	25
Elymus triticoides	Creeping wildrye	7
Poa secunda	One-sided bluegrass	2
Stipa cernua	Nodding needlegrass	3
Stipa pulchra	Purple needlegrass	3

3.3.2 Container Stock

Plants must be sourced from California and ideally from the Central Coast. Amount of container stock trees were calculated by A&M to determine appropriate spacing that would span the 4.6556- acre mitigation site according to average canopy spread at maturity, using representative the MCV's membership rules for Fremont cottonwood forest and woodland canopy values derived

from A&M's digital elevation model (area above 10 feet) that was acquired from a 2022 drone flight along the Salinas River. Figure 5 shows the actual representative canopy percentage as 47 percent. As shown in Figure 5 we did not include the 2020 fire scar within that representative canopy area. We calculated the amount of trees needed from the existing condition, with the mature canopy cover target at ~~30~~ 46 percent absolute cover for mature trees after 70 percent survival. The total quantity of trees to be planted at implementation would be approximately 66~~43~~ percent absolute cover to account for 30 percent mortality. Native trees proposed for mitigation include, but are not limited to, the species and quantities listed in Table 5 and shown in the conceptual planting plan (Figure 5).

TABLE 5. PLANT PALETTE FOR FREMONT COTTONWOOD FOREST AND WOODLAND

Species	Common name	Approx. container size	*Ave. canopy spread at maturity (ft.)	Target quantity of trees after 70% survival	Total Quantity of trees to be planted at implementation (100% survival)
Acer negundo	Box elder	1 to 15 gal	35	~~11~~17	~~16~~24
Populus fremontii	Cottonwood	1 gal	40	~~16~~25	~~23~~36
*Salix laevigata***	Red willow	Live stakes, or treepots[4]	25	64~~42~~	~~60~~91
*Quercus lobata****	Valley oak	1 to 15 gal	50	~~8~~6	~~9~~12

*SelecTree: A Tree Selection Guide (selectree.calpoly.edu)
**Two red willows may be substituted with one western sycamore (*Platanus racemosa*), box elder (1), cottonwood (1), or three blue elderberries (*Sambucus mexicanus*) depending on availability
***May be substituted with coast live oak (*Quercus agrifolia*), blue oak (*Q. douglasii*), or black walnut (*Juglans hindsii*) depending on availability.

Planting Recommendations:

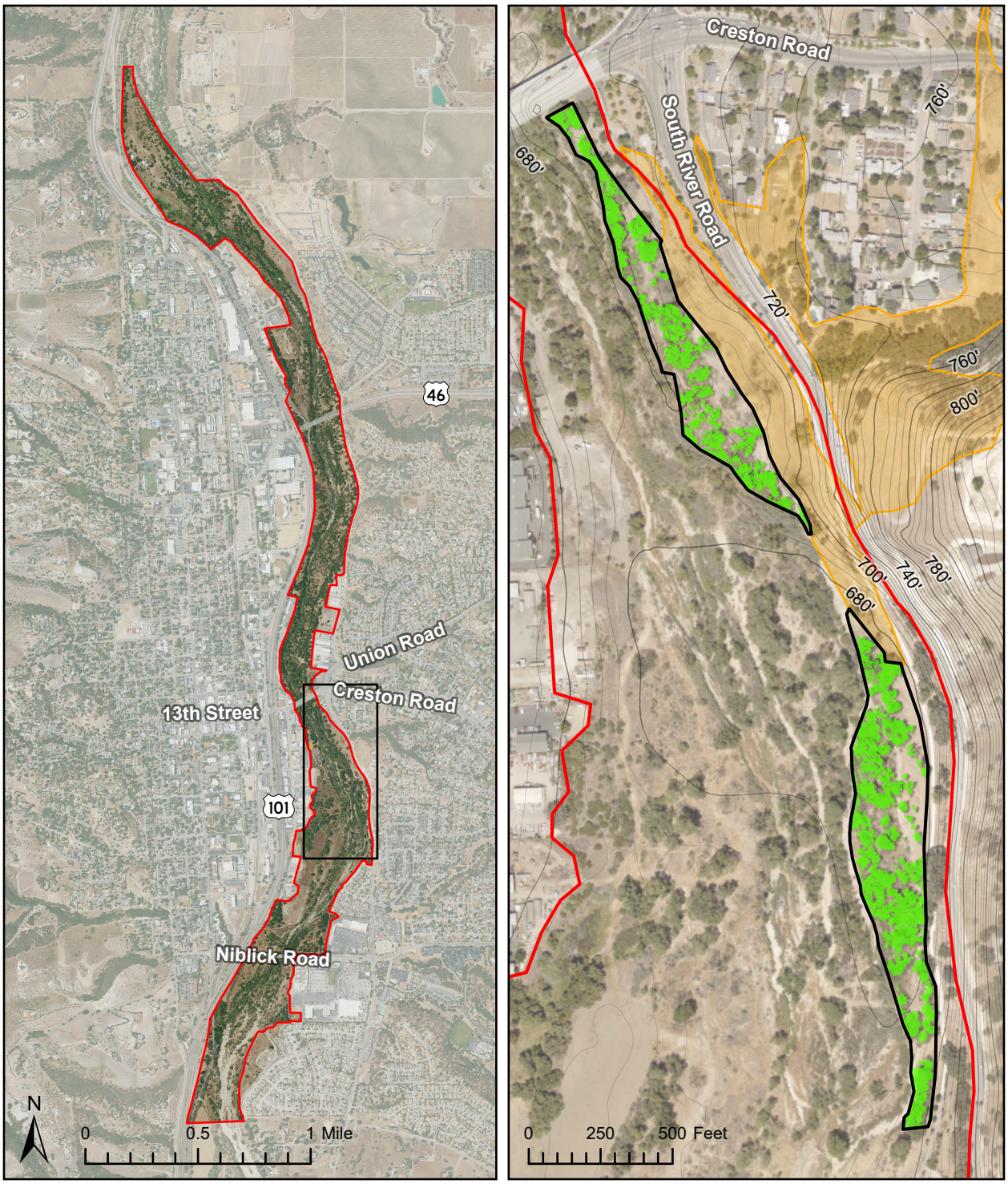
1. Planting locations will be flagged and mapped.
2. Order plant material 9 to 12 months prior to anticipated delivery. Plant material should be sourced from California Central Coast genetic material.
3. Dig holes a minimum of twice the diameter and same depth as the container.
4. Plant or fill holes each day to prevent small mammal entrapment or trip hazard.
5. Place root protection barriers in the holes, and plant trees according to recommendations from U.C. Cooperative Extension[5].
6. Ensure all trees are protected from rodent damage and deer/people damage with below- and above-ground protection devices. We recommend aviary wire cages below-ground, and tree

[4] Treepot such as Stuewe TP430 30inch tall, 4 inches wide (or equivalent).
[5] Hickman, Gary W. and Pavel Svihra. 2001. Planting Landscape Trees; Publication 8046. University of CA Agriculture and Natural Resources. Available at https://anrcatalog.ucanr.edu/pdf/8046.pdf

tubes or screen cage to protect young trees, and location surrounded by twisted- or chicken-wire cage.

7. Provide each planting area with a 4-ft-diameter 3-inch-thick mulch ring that begins a minimum of 3 inches from the stem of each planting location (approximately 3 cubic feet per planting location).

Figure 5. Canopy Cover Analysis



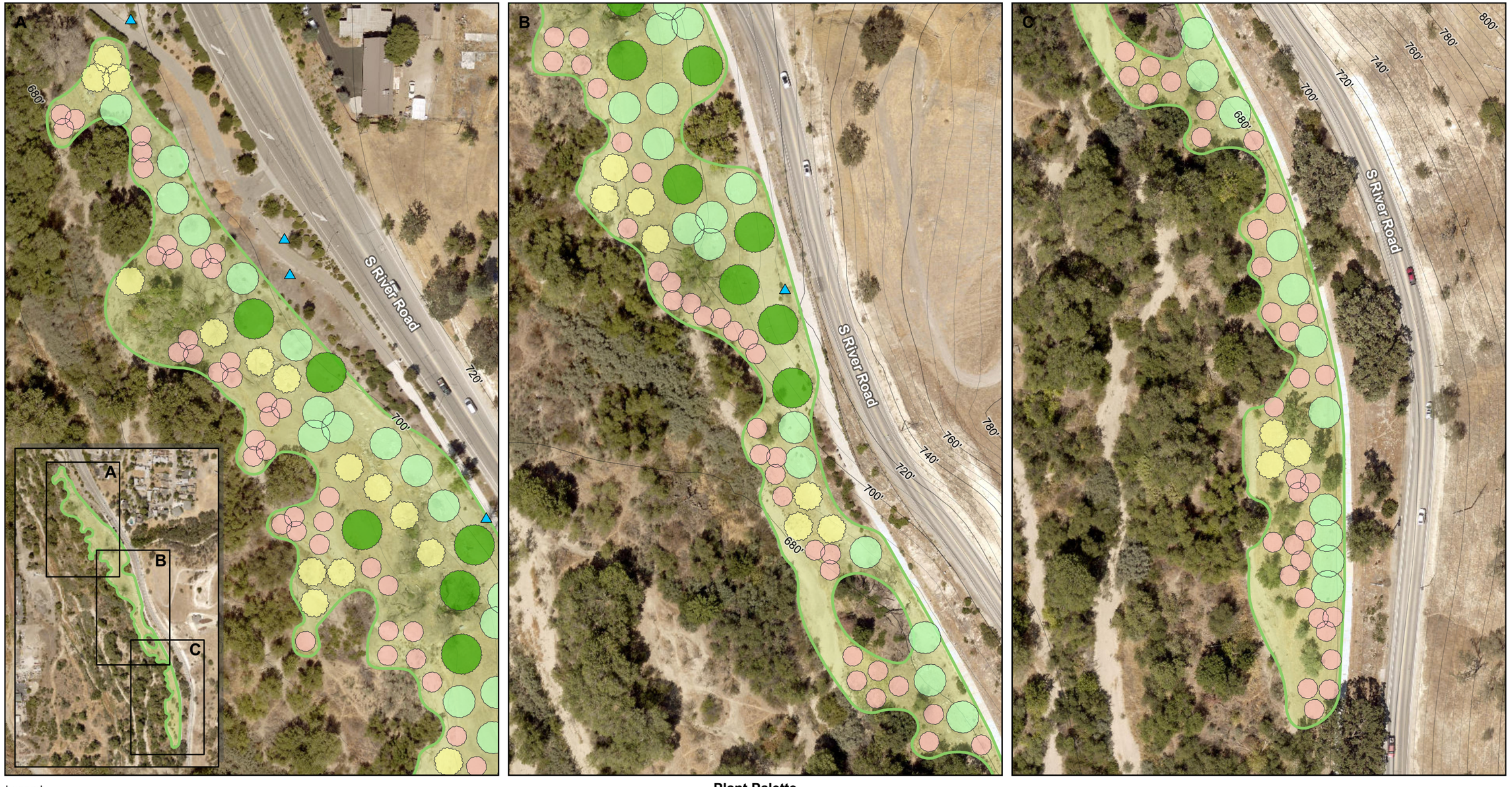
Legend

- Fuel Reduction Area
- Canopy Survey Area (7.9 acres)
- Canopy (3.7 acres)
- Fire Boundary (July 2020)

City of Paso Robles
Revegetation Plan for Annual Flood Control and Fire Fuel Load Reduction Project
Map Center: 120.68226°W 35.62478°N
Paso Robles, San Luis Obispo County

Imagery Source: USDA NAIP, 05/13/2022

Figure 6. Conceptual Planting Plan



Legend

Fuel Reduction Area

Revegetation Area (4.65 acres)

Irrigation Points

N

0 100 200 Feet

Plant Palette

Tree	Species	Common Name	Container	Habitat	Quantity
	Acer negundo	Box elder	1 to 15 gal	Riparian, Oak Woodland	24
	Populus fremontii	Cottonwood	1 gal	Riparian	36
	Quercus lobata	Valley oak	1 to 15 gal	Riparian, Oak Woodland	12
	Salix laevigata	Red willow	Live stakes or treepots	Riparian	91

City of Paso Robles
Revegetation Plan for Annual Flood Control and Fire Fuel Load Reduction Project
Map Center: 120.68283°W 35.62696°N
Paso Robles, San Luis Obispo County

Imagery Source: San Luis Obispo County 08/23/2021

ALTHOUSE AND MEADE, INC.
BIOLOGICAL AND ENVIRONMENTAL SERVICES

Map Updated:
April 15, 2024 11:51 AM by SAF

3.4 Phase 4: Maintenance and Monitoring

Maintain mitigation site and monitor for problems according to the maintenance and monitoring schedule (Table 6), or until the primary performance standards are achieved, whichever is longer. The restoration ecologist may reduce maintenance and monitoring visits quarterly in Years 3 through 5 if weed management is under control and more frequent visits are not necessary. The installation/maintenance contractor(s) will complete maintenance requests from the restoration ecologist within 14 days of any written request or monitoring report.

TABLE 6. MAINTENANCE AND MONITORING SCHEDULE

Reporting	Maintenance and Monitoring Activities
Year 1	Monthly maintenance and monitoring, weekly monitoring during installation.
Year 2	Quarterly maintenance and monitoring
Year 3	Quarterly maintenance and monitoring
Year 4	Quarterly maintenance and monitoring
Year 5	Quarterly maintenance and monitoring

3.4.1 Maintenance Plan

The mitigation site shall be maintained regularly by the contract landscapers with oversight from City representatives and the restoration ecologist. Mitigation sites shall be inspected to evaluate the establishment of planted trees from year to year and to provide weed abatement, supplemental planting, and modifications as needed. The contract landscaper will consult with the restoration ecologist to solve problems as they arise. The contract landscaper shall be responsible for controlling non-native plant species, irrigation, trash, and signs described by the following:

1. Non-native plant control

a. **Hand Crews**. Herbaceous vegetation within the mitigation sites will require weeding to promote native species dominance and to reduce plant species competition for resources. Vegetation management will primarily consist of manual weeding techniques with oversight by a qualified restoration ecologist. Mechanical weeding (i.e., weed whacking) may be used during appropriate times of year if approved by the restoration ecologist. Herbicides or similar methods may be required to address large weed infestations that may recruit into the mitigation site. Most herbicides are restricted within wetland areas and require a setback from waterways. Wetland herbicides are acceptable if approved by the restoration ecologist and are applied at the appropriate times of year (i.e., during the dry season). Herbicides may not be used within the critical root zone (CRZ) of oak and mitigation trees.

Trimming of tree and shrub canopy in the mitigation site would trigger 0.5:1 mitigation ratio following the mitigation requirements described in Order #40(c), which states:

Mitigation shall be implemented [for] rehabilitation or enhancement implemented within the Salinas River channel where future fire fuel load reduction will be managed by grazing for control of grasses only, minimum required rehabilitation or enhancement to impact

ratio for the impacts categorized as trimming of tree and shrub canopy within the floodplain is 0.5:1.

b. **Grazing**. Livestock grazing may be allowed in the mitigation site during the 5-year monitoring period with implementation of protective measures approved by City representative and restoration ecologist that will ensure oak and mitigation tree survival and to avoid grazing on immature oaks or saplings. Protective measures may include electric fencing or other deer browse protection installed around planted oaks and mitigation trees. Livestock grazing may be used to address invasive weed infestations or as a fuel reduction measure if thatch or other build up is noted in the Annual Work Plan. Grazing must be timed appropriately to avoid disturbing the mitigation site, and during periods where target species are most palatable to livestock. Grazing management techniques within the mitigation site will require prior approval from City representatives in coordination with the restoration ecologist or a rangeland manager.

2. **Irrigation**

   a. Check irrigation system regularly for proper function. Repair any leaks, plugged emitters, or other problems. Adjust watering schedule as needed to ensure survival.

   b. Provide irrigation to container-stock during Years 1 through 3 from April through October, and during any month from November to March with below-normal precipitation. Irrigation will be reduced during winter months depending on rainfall. If irrigation is provided, it will be adjusted annually to taper watering by Year 3, or until no supplemental irrigation is required.

   c. If needed, supplemental water will be brought in from a water truck for hand watering and container plants/live stakes will be seasonally timed to coincide with forecasted rain as appropriate.

3. **Trash**. All trash and debris that accumulates in the mitigation site will be removed regularly (on a monthly basis or quarterly basis, at minimum) and disposed of properly as part of ongoing maintenance.

4. **Signs**. Signage may be used to keep the mitigation site clear of public use. Language used on signs may state “Riparian Conservation Area Please Do Not Disturb,” or something to the like. Signs may include background information on sensitive resources within the mitigation site for viewers to learn about their environment and understand the need to protect natural resources. Signage can be developed with the restoration ecologist or qualified biologists to help promote community awareness of the importance of conservation. Weathered, degraded, or vandalized signs shall be repaired or replaced as needed for continued protection of the mitigation site.

3.4.2 Monitoring Plan

Monitoring will be conducted weekly during the installation phase and monthly for the rest of the year, quarterly during Year 2 and thereafter. The mitigation site shall be monitored until the primary performance standard is achieved (refer to Section 4.0).

1. Establish photo points at each mitigation site immediately after installation is complete. Take photographs from each photo point to document revegetation success.

2. Monitor sites monthly for survival during Year 1 and quarterly during years 2 through 5
3. At the end of each monitoring year, count all surviving trees and live stakes planted for this project in mitigation site and compare results to target survival rates.

4 PERFORMANCE STANDARDS

Results of annual monitoring activities will be compared to success criteria presented in Table 7. An overall goal of 70 percent survival of container stock and live stakes is proposed by the end of Year 5. The survival rate of mitigation plants is the primary performance standard for this project. Success rates that are below the stated minimum target for each criterion indicate the need for additional revegetation, plant protection, irrigation, or non-native plant removal. An adaptive management strategy for failure to meet the performance standards is provided in Section 6.0.

TABLE 7. SUCCESS CRITERIA

Feature	Success Criteria	Assessment Method	Success Criteria by Monitoring Year				
			Year 1	Year 2	Year 3	Year 4	Year 5
Tree and shrub container stock (mitigation site)	Percent survival*	Count surviving plants at each site	70%	70%	70%	70%	70%
Live stakes (project and mitigation site)	Percent survival*	Count surviving live stakes at each site	70%	70%	70%	70%	70%

*Percent of trees planted at implementation (see Table 5, last column).

5 REPORTING REQUIREMENTS

Brief reports will be sent via email after each maintenance activity to the City representative, with recommendations and updates on habitat conditions related to meeting performance standards. Results of maintenance and monitoring will be included in the Annual Report for a minimum of five (5) years by December 31 of each year. The mitigation site will be documented annually to assess site condition issues such as trash, erosion, invasive vegetation, or pests. The Waterboard requires reporting to include the following information (**MRP, #8g, page 6; Attachment D**):

a. *Date of initiation of mitigation installation and date mitigation installation was completed;*

b. *If mitigation installation was completed, confirmation that mitigation was installed according to the requirements of this Order and as described in the Mitigation Plan;*

c. *Analysis of monitoring data collected in the field;*

d. *Quantification of growth, survival, general health and stature, signs of resprouting of non-native trees and giant reed and documentation of progress toward achieving all mitigation performance criteria;*

e. *Qualitative and quantitative comparisons of current mitigation conditions with preconstruction conditions and previous mitigation monitoring results;*

f. *Any remedial or maintenance actions taken or needed;*

g. *Any additional information specified in the Mitigation Plan; and*

h. *Annual photo-documentation representative of all mitigation areas, taken from vantage points from which the Central Coast Water Board can identify changes in size and cover of plants. The Discharger must compare photos of installed mitigation with photos of the mitigation areas prior to installation.*

The Year 5 Final Monitoring Report shall summarize all data collected during the previous monitoring periods. If Year 5 performance standards are met, the final monitoring report shall include a notice of project completion.

If the mitigation sites do not meet the required performance standards by Year 5, an adaptive management plan shall be prepared and annual monitoring of the sites will continue until success standards are achieved.

6 ADAPTIVE MANAGEMENT

Monitoring shall be conducted as needed throughout the year to ensure survival of all mitigation plants. Weed removal, supplemental irrigation, and fertilization may be implemented as needed to enhance survival. All replacement plants shall be inspected in the fall of each year to evaluate their condition. The revegetated site shall be monitored annually until the primary performance standards are met.

Pursuant to Order #39,

> *Mitigation shall achieve success criteria described in the Mitigation Plan by the fifth year following mitigation installation. If mitigation measures do not meet their interim or final success criteria, the discharger shall implement remedial measures until such time the interim or final success criteria are met.*

If performance standards are not met during any year, the annual monitoring report shall indicate the source(s) of the problem(s) and recommend remediation. If replacement tree/shrub survival criteria are not met, additional plantings will be installed, until the interim or final success criteria are met. The cause of the problem would determine remediation actions beyond installation of additional plantings. If replacement tree/shrub survival does not meet the performance standard due to excessive weed problems, frequency of weeding will be increased, and either additional mulch may be added around plantings, or weed mats may be installed. If survival criteria are not met due to drought, frequency of watering will be increased, and/or the period of supplemental irrigation may be extended.

In the event of failure due to a catastrophic event, the Discharger could submit an amended Plan as described in Order # 43 which states:

> *If at any time during the implementation and establishment of planted or graded mitigation areas and prior to verification of meeting success criteria, a catastrophic natural event (e.g., fire, flood) occurs and impacts the mitigation area, the Discharger is responsible for implementing mitigation so that no net loss of aquatic resource habitat or beneficial uses occurs as a result of Project activities. The Discharger may pursue alternative compliance by submitting an amended Mitigation Plan for written approval from the Central Coast Water Board Executive Officer.*

7 ATTACHMENTS

- **Attachment A. Order No R3-2021-0012 (4/16/2021)**
- **Attachment B. Dormant Willow or Cottonwood Sprig Installation (CDFW 2003)**
- **Attachment C. Protocol for Non-Native Invasive Plant Removal**
- **Attachment D. Monitoring and Reporting Program for Order No. R3-2021-0012**

ATTACHMENT A. ORDER NO R3-2021-0012 (4/16/2021)

CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD

895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

ORDER NO. R3-2021-0012

WASTE DISCHARGE REQUIREMENTS FOR THE CITY OF EL PASO DE ROBLES ANNUAL FLOOD CONTROL AND FIRE FUEL LOAD REDUCTION PROJECT

CALIFORNIA
Water Boards
STATE WATER RESOURCES CONTROL BOARD
REGIONAL WATER QUALITY CONTROL BOARDS

TABLE OF CONTENTS

The California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board) finds that:

SITE OWNER AND LOCATION

1. The City of El Paso de Robles (Discharger) proposes to conduct activities that will result in temporary, recurring impacts to ephemeral drainages, riparian habitat, and other waters of the state as part of the City of El Paso de Robles Annual Flood Control and Fire Fuel Load Reduction Project (Project).

2. The Discharger proposes to conduct the Project on a portion of the Salinas River watershed within city limits in northern San Luis Obispo County. City limits are shown in Exhibit 1: Project Vicinity Map. The Project area includes the Salinas River, selected drainages, and sediment basins. Flood control activities may be conducted in 19 drainages and two basins (a total of 21 locations), as shown in Exhibit 2: Flood Control Locations. The fire fuel load reduction area includes the Salinas River channel and floodplain from the intersection of North River Road and Clubhouse Drive in the north, to the southern end of Larry Moore Park at the south end of Riverbank Lane (Exhibit 3: Fire Fuel Load Reduction Areas). The Project area is within the Salinas River Hydrologic Unit, as described in the 2019 *Water Quality Control Plan for the Central Coastal Basin* (Basin Plan). Surface water within the Project area drains into the Salinas River, which outlets to the Pacific Ocean approximately 100 miles to the north in Monterey County.

PURPOSE OF ORDER

3. On July 31, 2020, the Discharger submitted a report of waste discharge (ROWD or permit application) describing temporary impacts and discharges of waste associated with the Project to waters of the state. Flood control activities will be conducted to reduce local flooding during heavy rain events. Fire fuel load reduction activities will be conducted to reduce the risk, intensity, and speed of spread of potential fires within the Salinas River channel and floodplain.

4. On October 19, 2020, the Discharger submitted an amendment to the ROWD after preliminary discussions with Central Coast Water Board staff that included significant changes to the Project description compared to those proposed in the July 31, 2020 ROWD. One of the significant changes was the elimination of broadcast burning from the fire fuel load reduction portion of the project. The Discharger also added a conceptual description of a wet weather preparedness plan and management practices for sensitive habitat avoidance, flagging, and staging. The Discharger introduced alternative compensatory mitigation strategies and proposed mitigation success criteria for the alternative strategies.

5. On October 30, 2020, the Discharger submitted *Desired Conditions for Fuel Beds within the Salinas River Fuels Reduction Project* (Exhibit 4).

6. On November 18, 2020, the Discharger submitted a proposal for selection criteria for mitigation receiver sites.

7. On November 30, 2020, the Discharger submitted information on cumulative impacts to tree and shrub canopy from fire fuel load reduction activities conducted in 2019 and 2020 (Exhibit 5 and 6).

8. On December 16, 2020, the Discharger submitted an amended supplemental information document, a revised Impacts Quantification Table (Exhibit 7), and a revised Mitigation Receiver Site Selection guidance document (Exhibit 8).

9. The Discharger submitted additional definitions for desired fuel models on December 22, 2020.

10. A preliminary evaluation of potential mitigation sites was submitted on January 8, 2020 (Exhibit 9).

11. A final version of the *Annual Drainage Maintenance Report of Waste Discharge Supplemental Information Report* was submitted on January 12, 2021 (Exhibit 10) and Central Coast Water Board staff determined the ROWD to be complete.

12. The U.S. Army Corps of Engineers (USACE) has not taken jurisdiction over the project activities. As such, the Central Coast Water Board is issuing individual waste discharge requirements rather than a federal Clean Water Act section 401 water quality certification for the project.

13. The California Department of Fish and Wildlife (CDFW) issued a Lake and Streambed Alteration Agreement for annual flood control activities in 2013 (Notification No. 1600-2013-0215-R4). On November 16, 2020, CDFW authorized an extension of the existing Streambed Alteration Agreement until March 10, 2025. A Streambed Alteration Agreement for annual fire fuel load reduction activities is pending.

14. The proposed Project includes flood control and fire fuel load reduction components. The flood control component of the project consists of manual vegetation treatment and mechanical and manual sediment removal, which will enhance the channel capacity and stormwater flow in drainages throughout the city. The fire fuel load reduction component of the Project consists of mechanical and manual vegetation treatment, low-intensity prescribed burns, and livestock grazing, reducing hazardous fire fuels within the Salinas River channel and floodplain. Both flood control and fire fuel load reduction components will take place annually from April 15 to October 14.

15. The term *waste* is defined by California Water Code section 13050(d) and includes "any and all other waste substances, liquid, solid, gaseous, or radioactive, associated with human habitation." Project activities will result in discharges of waste or threatened discharges of waste that could affect the quality of the waters of the state. As a result of vegetation management, large woody debris, downed vegetation, and masticated material will be discharged in locations and in a manner that could affect the quality of the waters of the state. These discharges will occur in quantities and at locations and times that would not occur under natural conditions and are therefore waste discharges associated with human activity and habitation. In addition, vegetation management activities will reduce canopy cover, which can lead to erosion and sediment discharge to waters of the state as well as an increase of temperature - in waters of the state. Mechanized equipment used for vegetation management and sediment removal can also result in erosion and discharges of sediment and petroleum products from equipment into waters of the state. Livestock used for herbivory treatment can result in discharge of bacteria and introduction of invasive species. Discharges of sediment, heat, petroleum products, and livestock waste are discharges of waste associated with human activity and habitation that have the potential to affect the quality of the waters of the state.

16. Waters of the state that will be impacted by the project activities are shown in Exhibits 2 and 3, including 19 drainages and two basins where annual vegetation maintenance has taken place since 2015, as well as the Salinas River channel and floodplain. Vegetation and sediment management for flood control will result in direct, recurring, temporary impacts to waters of the state over an area of approximately 0.8 acres and 56,035 linear feet. Vegetation management for fire fuel load reduction will result in direct, recurring, temporary impacts to the Salinas River channel and floodplain over an area of approximately 140 acres and 20,026 linear feet.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

17. The City of El Paso de Robles is the lead agency for the Project pursuant to the California Environmental Quality Act (CEQA) (California Public Resources Code section 15367). As the lead agency, the City of El Paso de Robles certified the Initial Study/Mitigated Negative Declaration for the City of Paso Robles Salinas River Vegetation Management Program on April 14, 2021, in accordance with California Code of Regulations title 14, chapter 3 and California Public Resources Code section 15301.

    a. The Central Coast Water Board is a responsible agency under CEQA (California Public Resources Code section 21069) and, in making its determinations, presumes that the City of El Paso de Robles's adopted

environmental document comports with the requirements of CEQA and is valid. (California Public Resources Code section 21167.3.) The Central Coast Water Board has reviewed and considered the environmental document and the environmental effects of the Project on water quality and beneficial uses. (California Code of Regulations, title 14, section 15096, subdivision (f).)

b. The Central Coast Water Board has determined that the Project, when implemented in accordance with the mitigation monitoring and reporting program and the conditions in this order, will not result in any significant adverse water resource impacts. (California Code of Regulations, title 14, section 15096, subdivision (h).)

18. The City of El Paso de Robles filed a categorical exemption for the routine flood protection maintenance on February 8, 2021, in accordance with California Coded of Regulations title 14, chapter 3, and California Public Resources Code section 15301. The Central Coast Water Board has determined that the routine flood protection maintenance portion of the Project is exempt from review under CEQA pursuant to California Code of Regulations, title 14, section 15061. Specifically, the issuance of this order and the activities described herein meet the exemption criteria under California Code of Regulations, title 14, section 15301. Additionally, the Central Coast Water Board concludes that no exceptions to the CEQA exemption apply to the activities approved by this order.

BASIN PLAN

19. The Basin Plan was updated and adopted by the Central Coast Water Board on June 14, 2019. The Basin Plan incorporates statewide plans and policies by reference, identifies water quality standards, and contains implementation strategies for protecting state waters. This order implements the water quality standards in the Basin Plan.

20. The Project area includes the Salinas River channel and floodplain as well as unnamed ephemeral drainages and blue line streams that drain the Project area and flow to the Salinas River. The Project area includes water bodies not identified in the Basin Plan. Surface water bodies not identified in the Basin Plan and that do not have beneficial uses designated for them are assigned the designations of municipal and domestic water supply and protection of both recreation and aquatic life. Franklin Creek and the Salinas River are streams in the Project area that are listed water bodies in the Basin Plan with the following beneficial uses:

    a. Franklin Creek:

i. Municipal and domestic supply
ii. Agricultural supply
iii. Groundwater recharge;
iv. Water contact recreation;
v. Non-contact water recreation;
vi. Wildlife habitat;
vii. Commercial and sport fishing.

b. Salinas River:

i. Municipal and domestic supply;
ii. Agricultural supply;
iii. Industrial process supply;
iv. Groundwater recharge;
v. Water contact recreation;
vi. Non-contact water recreation;
vii. Wildlife habitat;
viii. Cold fresh water habitat;
ix. Warm fresh water habitat;
x. Migration of aquatic organisms;
xi. Spawning, reproduction, and/or early development;
xii. Rare, threatened, or endangered species;
xiii. Commercial and sport fishing.

WATERS OF THE STATE CONSERVATION AND MITIGATION

21. State Water Board Resolution No. 68-16, *Statement of Policy with Respect to Maintaining High Quality of Waters in California* (Resolution No. 68-16), requires regional water quality control boards, in regulating the discharge of waste, to maintain high quality waters of the state until it is demonstrated that any change in quality will be consistent with maximum benefit to the people of the state, will not unreasonably affect beneficial uses, and will not result in water quality less than that described in a regional water quality control board's policies (e.g.,

quality that exceeds applicable water quality standards). Resolution No. 68-16 also states, in part: "*Any activity which produces or may produce a waste or increased volume or concentration of waste and which discharges or proposes to discharge to existing high quality waters will be required to meet waste discharge requirements which will result in best practicable treatment and control of the discharge necessary to assure that (a) a pollution or nuisance will not occur and (b) the highest water quality consistent with maximum benefit to the people of the State will be maintained."* The discharges regulated by this order are subject to waste discharge requirements that will result in best practicable treatment or control, the prevention of pollution and nuisance, and maintenance of the highest water quality consistent with maximum benefit to the people of the state.

22. Project activities such as vegetation treatment and sediment removal can result in partial or complete loss of waters' beneficial uses at those locations, including temporal loss. To reconcile such losses with the antidegradation requirements of State Water Board Resolution No. 68-16, this order requires the Discharger to implement a mitigation plan to ensure that Project impacts to beneficial uses are mitigated through avoidance and minimization, and that unavoidable loss of beneficial uses is offset with appropriate compensatory mitigation.

23. This order specifies waste discharge requirements that are necessary to adequately address effects on, and threats to, water quality resulting from discharges of waste to waters of the state; to be consistent with antidegradation provisions of State Water Board Resolution No. 68-16; and to accommodate and require appropriate changes during implementation of the Project. Through adherence to the waste discharge requirements, the Project, as described in this order, will not result in violation of state water quality standards.

24. For purposes of this order, restoration is defined as a combination of rehabilitation and enhancement. Rehabilitation is defined as manipulation of the physical, chemical, or biological characteristics of a site with the goal of repairing natural/historic functions to a degraded aquatic resource, resulting in a gain in aquatic resource function but not in a gain in aquatic resource area. Enhancement is defined as manipulation of the physical, chemical, or biological characteristics of an aquatic resource to heighten, intensify, or improve a specific aquatic resource function(s), resulting in the improvement of selected aquatic resource function but not a gain in aquatic resource area.

25. Mitigation for project activities is described in Section 5: Compensatory Mitigation, in the revised *Annual Drainage Maintenance Report of Waste Discharge Supplemental Information Report* dated January 2021 and the *Mitigation Receiver Sites* selection guidelines submitted January 8, 2020. Both documents together are referred to as the Mitigation Plan. The Mitigation Plan

will adequately compensate for impacts to beneficial uses of waters of the state associated with the project activities. The Discharger may modify mitigation sites identified in *Mitigation Receiver Sites Preliminary Evaluation* (Exhibit 9) with written approval from the Central Coast Water Board Executive Officer, depending on success factors identified during implementation of the Project. Selection guidelines in the Mitigation Plan will further assist the Discharger to select optimal locations for mitigation receiver sites.

26. During 2019 and 2020, the Discharger conducted unauthorized emergency vegetation management work for fire fuel load reduction in the Salinas River channel and floodplain. Mitigation for the impacts to beneficial uses resulting from this work is also required by this order. These impacts are quantified in the 2019 and 2020 Impacts Quantification Table, Exhibit 7. In 2019, 64 acres of total work area were impacted. In 2020, 102 acres of total work area were impacted. Cumulative impacts to tree and riparian canopy for 2019 and 2020 combined was 10.5 acres. Mitigation for impacts from the 2019 and 2020 emergency work is required by this order, according to the mitigation ratios specified herein. The Discharger is required to mitigate for impacts only once for impacts occurring until 2025. Repeat maintenance activities that occur within the footprint of previous maintenance activities of the same type do not require additional mitigation, provided that mitigation was provided for the initial impact.

GENERAL FINDINGS

27. Section 13260(a) of the California Water Code requires that any person discharging waste or proposing to discharge waste within any region, other than to a community sewer system, which could affect the quality of the waters of the state,[1] file an ROWD. The discharge of cut vegetation and disturbed sediment resulting from Project activities constitutes a discharge of waste that could affect the quality of waters of the state, as described in finding 15.

28. California Water Code section 13263(a) requires that waste discharge requirements be prescribed as to the nature of any proposed discharge, existing discharge, or material change in an existing discharge. Such waste discharge requirements must implement any relevant water quality control plans, taking into consideration beneficial uses to be protected, the water quality objectives reasonably required for those purposes, other waste discharges, the need to prevent nuisance, and the provisions of section 13241 of the California Water Code.

[1] Waters of the state means any surface water or groundwater, including saline waters, within the boundaries of the state.

29. On January 26, 2021, the Central Coast Water Board notified the Discharger and interested agencies and persons of its intention to issue these waste discharge requirements and provided an opportunity to review a copy of the proposed order and submit views and comments.

30. The Central Coast Water Board, in a public meeting held on April 14-16, 2021, heard and considered all comments pertaining to the proposed discharge.

ORDER

IT IS HEREBY ORDERED THAT that upon adoption of this order, pursuant to California Water Code sections 13263 and 13267, the Discharger, its agents, successors, and assigns, to meet the provisions contained in division 7 of the California Water Code and regulations adopted hereunder, must comply with the following requirements in this order.

Prohibitions

1. The discharge of waste in a manner other than as described in the April 14, 2021 Initial Study/Mitigated Negative Declaration for the City of Paso Robles River Vegetation Management Program, February 8, 2021 Categorical Exemption for the Routine Flood Protection Maintenance; ROWD; *Annual Drainage Maintenance Report of Waste Discharge Supplemental Information Report* submitted January 12, 2021 (Exhibit 10); *Desired Conditions for Fuel Beds within the Salinas River Fuels Reduction Project* guidance document submitted October 30, 2020 (Exhibit 4); the Impacts Quantification Table (Exhibit 7) and Mitigation Receiver Site selection guidelines (Exhibit 8) submitted December 16, 2020; or findings of this order is prohibited unless the Discharger obtains revised waste discharge requirements that provide for the proposed change prior to the discharge's occurring.

2. The discharge of waste in a manner that has not been described in the ROWD, and for which valid waste discharge requirements are not in force, is prohibited.

3. The discharge of waste shall not create a condition of pollution, contamination, or nuisance, as defined by section 13050 of the California Water Code.

4. The discharge shall not directly or indirectly destabilize a channel or bed of a receiving water.

5. The discharge, as mitigated, shall not cause significant adverse environmental impacts.

6. The discharge shall not cause, in combination with other discharges, a significant cumulative adverse effect on water quality or beneficial uses of the waters of the state, including, but not limited to, wetlands, riparian areas, and headwaters.

7. Discharges to surface waters of wastes or pollutants that are not otherwise regulated by separate National Pollutant Discharge Elimination System (NPDES) requirements or waste discharge requirements are prohibited.

8. The discharge of waste classified as “hazardous” or “designated” as defined in title 22, section 66261 of the California Code of Regulations, or California Water Code section 13173, is prohibited.

9. The discharge of sand, silt, clay, or other earthen materials from any activity in quantities that cause deleterious bottom deposits, turbidity, or discoloration in waters of the state or that unreasonably affect, or threaten to affect, beneficial uses of such waters is prohibited.

10. The dumping, deposition, or discharge of waste directly into waters of the state, or adjacent to such waters in any manner that may permit its being transported into the waters, is prohibited unless authorized by this order.

Provisions

General

11. The Discharger must comply with all conditions of this order. Violations may result in enforcement actions, including Central Coast Water Board orders or court orders requiring corrective action or imposing civil monetary liability, or in modification or revocation of these waste discharge requirements by the Central Coast Water Board. (California Water Code sections 13261, 13263, 13265, 13267, 13268, 13300, 13301, 13304, 13330, 13340, 13350, and 23 California Code of Regulations section 3867). The conditions within this order supersede conflicting provisions within applicant submittals.

12. The Discharger must comply with Basin Plan provisions, including protecting beneficial uses and complying with any prohibitions and water quality objectives governing the discharge. In the event of a conflict between the provisions of this order and the Basin Plan, the more stringent provisions prevail.

13. This order does not authorize any act that results in the taking of a threatened or endangered species or any act that is now prohibited, or becomes prohibited in the future, under either the California Endangered Species Act (Fish and Game Code sections 2050 to 2097) or the Federal Endangered Species Act (16 U.S.C.A. sections 1531 to 1544). This Order requires compliance with requirements to protect the beneficial uses of waters of the state, including

protecting rare, threatened, or endangered species. The Discharger is responsible for meeting all requirements of the applicable federal and state Endangered Species Act.

Maintenance Activities

14. The Discharger shall not commence the proposed maintenance activity until written approval of an annual workplan, submitted by March 15 of each year according to Monitoring and Reporting Program No. R3-2021-0012, included in this order, has been obtained from the Central Coast Water Board Executive Officer. The Discharger shall implement maintenance activities in accordance with the approved annual workplan for each year. If no response has been received from the Central Coast Water Board Executive Officer by April 14 of a given year, the Discharger may proceed with maintenance activities in accordance with the annual workplan. If the Central Coast Water Board sends comments on the annual workplan prior to April 14, the Discharger must address those comments and receive written approval of the Annual Work Plan before activities commence.

15. Prior to maintenance activities, the Discharger shall perform the following, using information obtained by the pre-activity survey conducted in accordance with the ROWD completed on January 12, 2021, and the Visual Monitoring section of Monitoring and Reporting Program No. R3-2021-0012 included in this order:

    a. Clearly identify and delineate, by flagging or staking, the boundaries of each maintenance area and points of connection to the channel;

    b. Clearly identify and delineate, by flagging or staking, sensitive resources to be avoided, including at a minimum the low-flow channel, riparian vegetation associated with flow channels, wetlands, and surface water;

    c. Clearly identify and delineate, by flagging or staking, the boundaries of invasive species removal areas;

    d. Evaluate the proposed alignment of each maintenance area compared to field conditions and adjust the alignment of the maintenance area where maintenance impacts could be reduced without reducing flood control or fire fuel reduction benefits;

    e. Identify what treatment/maintenance type will be used for each maintenance area to achieve the desired flood control and fire fuels reduction conditions, using information obtained by the visual assessments described in the Fire and Fuel sections below.

16. During maintenance activities within waters of the state, adequate erosion and sediment control measures (e.g., revegetation, fiber rolls, erosion control blankets, hydromulching, compost, straw with tackifiers) must be kept on site and immediately available for installation. If the National Weather Service predicts a 25% or more chance of at least 0.1 inches of rain within 24 hours (Predicted Rain Event), all maintenance activities within waters of the state must cease and the site manager must install effective erosion and sediment control measures. The Discharger shall install effective erosion control, sediment control, and other protective measures no later than the day prior to the Predicted Rain Event and prior to the start of any rainfall. Erosion and sediment control measures and other construction management practices shall be implemented and maintained in accordance with all specifications governing their proper design, installation, operation, and maintenance. Project activities below top of creek banks or in other waters of the state may resume after the rain has ceased, the National Weather Service predicts clear weather for at least 24 hours, and site conditions are dry enough to continue work without discharge of sediment or other pollutants from the project site.

17. The Discharger shall not conduct routine flood control and fire fuel load reduction in waters of the state from October 15 through April 14 unless prior written approval has been obtained from the Central Coast Water Board Executive Officer. A Wet Weather Preparedness Plan shall be submitted in the annual workplan (as described in Monitoring and Reporting Program No. R3-2021-0012, included in this order). Requests to conduct management activities outside the work window in any year shall be submitted to the Central Coast Water Board at least 21 days prior to the planned work date.

18. The Discharger must confine all trash and debris generated at the site during Project activities in appropriate enclosed bins. Trash and debris contained in rubbish bins that can be emptied by hand shall be disposed of at an appropriate site at least weekly. Large debris and trash recovered from the Salinas River channel contained in large roll-off or dumpster style bins shall be disposed of at an approved site when the trash receptacle is full. Large roll-off or dumpster style bins shall be properly secured and covered during rain events to prevent trash from escaping during the time they are in use.

19. Any proposed discharge/maintenance activity that may alter flow patterns and/or change the approved impact footprint is prohibited without Central Coast Water Board Executive Officer approval. Not later than thirty days prior to the beginning of any proposed change, the Discharger must submit for approval by the Central Coast Water Board Executive Officer detailed plans and specifications showing the proposed change in relationship to the approved annual workplan.

20. The City of El Paso de Robles shall use existing roads, trails, and access ramps to access maintenance areas to the maximum extent practicable. Access routes shall minimize crossings of dry channels to the maximum extent practicable. Where existing ingress and egress points are not sufficient, the City of El Paso de Robles shall identify specific locations for crossing dry channels prior to commencing work.

    a. Equipment shall not be driven through any wetted channel.

    b. Care shall be exercised if any heavy equipment needs to cross dry high-flow channels to ensure that no sediment is pushed into the channel from turning or from moving up or down banks. If sediment is pushed into the channel, within 48 hours it shall be removed, the bank returned to its original contours, and effective erosion control management practices installed.

    c. No heavy tracked equipment shall be used in the drainage channels, Salinas River channel and floodplain, or detention basins. Only handheld equipment such as chainsaws, string trimmers, mowers, or similar equipment shall be used in drainages or detention basins. A backhoe or excavator positioned outside the top of bank may be used to reach into the drainage or basin to remove sediment or material too heavy to be removed by hand. A small excavator may be used for fire fuel load reduction in the Salinas River channel and floodplain.

21. All vehicles and equipment used on site shall be well maintained and checked daily for fuel, oil, and hydraulic fluid leaks or other problems that could result in spills of hazardous materials.

22. Fueling, lubrication, maintenance, operation, and storage of vehicles and equipment may not result in a discharge or a threatened discharge to water bodies. At no time may the Discharger use vehicles or equipment that leak any substance that might impact water quality. Staging and storage areas for vehicles and equipment must be located 50 feet from the tops of channels and over drip pans. Temporary storage and refueling shall be confined to paved or well-compacted permanent roads and/or parking areas.

23. The Discharger must, at all times, maintain appropriate types and sufficient quantities of materials onsite 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 state.

24. All construction-related equipment and materials and any temporary management practices no longer needed must be removed and cleaned from the

site upon completion of maintenance each year and at the conclusion of the project.

25. Large woody debris, downed vegetation, and masticated material removed from maintenance areas shall be transported outside of the greater channel and shall be placed in locations outside of waters of the state and in locations where material cannot flow into waters of the state, except as authorized below.

    a. Large woody debris and downed vegetation may be temporarily stockpiled within the greater channel, provided that stockpiles (i) shall be placed only in already-disturbed areas; (ii) shall not be placed on native riparian vegetation; and (iii) shall be removed from the greater channel by October 1 of each year unless prior written approval is received from the Central Coast Water Board Executive Officer.

    b. Masticated material discharged within the Salinas River channel and floodplain shall not be placed in locations where it will cause flow obstruction and shall not be discharged in flow channels.

    c. The Central Coast Water Board Executive Officer will consider approval of permanent placement of large woody debris within the greater channel on a case-by-case basis upon written request in the annual workplan from the City of El Paso de Robles.

Fire Fuel Load Reduction

26. Areas in the primary fire break shall be visually assessed and compared to the *Natural Fuels Photo Series* and *Standard Fire Behavior Fuel Models: A Comprehensive Set for Use with Rothermel's Surface Fire Spread Model* to identify and flag areas that require treatment. As part of the visual assessments, the Discharger shall characterize vegetation according to the fuel model definitions included in Table 1, below. Fire fuel load reduction for each fuel model shall be conducted annually following the methods in the ROWD (Exhibit 4, *Desired Conditions for Fuel Beds within the Salinas River Fuels Reduction Project*) and according to the targets (in tons/acre) described as follows for each fuel model category:

    a. Grass fuel type: reduce fuels loading to no less than 0.4 tons per acre (from GR4 to GR1)

    b. Grass-shrub fuel type: reduce fuels loading to no less than 1.35 tons per acre (from GS2 to GS1)

    c. Shrub fuel type SH5 (typical of interior islands and areas without tree canopy cover): reduce fuels loading to no less than 3 tons per acre

d. Shrub fuel type SH8 (typical of areas with tree canopy cover and dense understories): reduce fuels loading no less than 2 tons per acre, focusing on ladder fuels

27. Fire fuel load reduction within the fire-break management area is not permitted without Central Coast Water Board Executive Officer review and approval of the annual workplan (as described in Monitoring and Reporting Program No. R3-2021-0012, included in this order). If no response to the annual workplan has been received from the Central Coast Water Board Executive Officer by April 14 of a given year, the Discharger may proceed with fire fuel load reduction activities in accordance with the annual workplan.

28. Native trees and shrubs measuring 4 inches diameter at breast height may be trimmed but removal shall be avoided to preserve canopy cover to the maximum extent possible.

29. Controlled burns shall be conducted according to the following management practices:

    a. Burn piles will be established, where necessary, on compacted road or parking lots where no vegetation is present. If burn piles are created in other areas, they (i) shall be established in open areas (with no trees) or be sized appropriately as to not negatively impact tree canopy; (ii) shall be placed only in already-disturbed areas; and (iii) shall not be placed in areas of native vegetation.

    b. Burn piles will not exceed 20 feet in length, width, or diameter.

    c. All pile-burn scars will have native duff, or organic mulch and seed raked into the scar to a minimum 85% coverage as soon as the burn is completely extinguished.

    d. Trash and debris (other than cut or masticated vegetation) will be removed each year in advance of broadcast burning.

Table 1:

Fuel Model	Description	Fire spread	tons/acre
GR1	Short grass, either naturally or by grazing, and may be sparse or discontinuous.	Spread rate is low, flame length low	0.40
GR4	Nearly pure grass and/or forb; moderately coarse continuous grass, average depth about 2 feet.	Spread rate very high, flame length high	2.15

Fuel Model	Description	Fire spread	tons/acre
GS1	Mixture of grass and shrubs combined. Shrubs are about 1 foot high; grass load is low.	Spread rate is moderate, flame length low	1.35
GS2	Mixture of grass and shrub, up to 50 percent shrub coverage; shrubs are 1-3 feet high, moderate grass load.	Spread rate high, flame length moderate	2.1
SH5	Shrub cover at least 50 percent, grass sparse to nonexistent; heavy shrub load, depth 4 to 6 feet.	Spread rate very high, flame length very high	6.5
SH8	Shrub cover at least 50 percent, grass sparse to nonexistent; dense shrubs, little to no herb fuel, depth about 3 feet.	Spread rate high; flame length high.	6.4

Flood Control

30. Maps of planned flood control areas must be submitted for Central Coast Water Board Executive Officer review and approval in the Annual Work Plan (as described in Monitoring and Reporting Program No. R3-2021-0012, included in this order). The Discharger shall identify the Vegetation Condition from the maintenance criteria in Table 2 for all areas planned for maintenance. The Discharger shall only conduct maintenance as specified in Table 2 upon written approval of the Annual Work Plan. If no response to the Annual Work Plan has been received from the Central Coast Water Board Executive Officer by April 14 of a given year, the Discharger may proceed with flood control activities in accordance with the Annual Work Plan.

31. Sediment removed from flood control areas shall be transported outside of the greater channel, placed in locations outside of waters of the state and in locations where sediment cannot flow into waters of the state, and transported to the Water and Streets Department Lower Water Yard, the Paso Robles Wastewater Treatment Plant, or another appropriate designated location such as Paso Robles Landfill or similar by October 1 of each year.

32. Sediment removal shall be conducted according to the description in Section 2.3.2: Sediment Removal and BR-11 of the ROWD. Sediment removal shall not occur when surface water is present, with the exception of the Scott Creek Basin and Westfield Drainage. Washed gravel bags shall be used in lieu of sandbags if

isolation of the work area is necessary. Monitoring for turbidity shall occur as described in Monitoring and Reporting Program No. R3-2021-0012, included in this order. Any changes to the in-water sediment removal methodology must be submitted for Central Coast Water Board Executive Officer review and approval at least 15 days prior to in-water work and implemented as specified in the approval.

33. All temporary diversion methods shall be designed to have the minimum necessary impacts to waters of the State to isolate the immediate work area. All diversion methods shall be installed such that natural flow is maintained upstream and downstream of the project area. Any temporary dams or diversions shall be installed such that the diversion does not cause sedimentation, siltation, or erosion upstream or downstream of the project area. All diversion methods shall be removed within 48 hours of completion of sediment removal activities. Any diversion must be implemented in compliance with the *Annual Drainage Maintenance Report of Waste Discharge Supplemental Information Report* (Exhibit 9). The Discharger shall implement corrective measures immediately if excessive turbidity is observed during turbidity monitoring.

Table 2:

Vegetation Condition	Vegetation Description	Maintenance description
Red	100% vegetation blocking inlets/outlets; vegetation holding sediment blocking inlet/outlet; vegetation occludes visual observation of pipes and/or restricts drainage flow.	Trim low vegetation and groundcover to allow free flow of water through inlet/outlet or drainage. Trim up trees to a height of 6 feet.
Yellow	50% vegetation blocking inlets/outlets	Same as above
Orange	25% vegetation blocking inlets/outlets	Same as above
Green	0% vegetation blocking inlets/outlets	No maintenance required

Site Management

34. All Discharger staff and associated contractors that plan to work within waters of the state must attend annual pre-work training, prior to commencement of their activities, on the conditions of this order and how to perform their activities in

compliance with those conditions. Trainings shall be conducted by a qualified biologist with training and experience in waste discharge requirements and compliance and documented through the use of a sign-in sheet, to be kept on record.

35. The Discharger shall only conduct herbicide application if specified in the annual workplan reviewed and approved by the Central Coast Water Board Executive Officer. If herbicide use is planned, the Discharger or personnel applying herbicides must have all the appropriate state and local herbicide applicator licenses and comply with all state and local regulations regarding herbicide use, including enrollment under Water Quality Order No. 2013-0002-DWQ, *Statewide General NPDES Permit for Residual Aquatic Pesticide Discharges to Waters of the United States from Algae and Aquatic Weed Control Applications*. The Discharger must mix herbicides and apply them in conformance with the product manufacturer's directions. The Discharger may only use products identified as non-toxic to birds and small mammals near nests or dens, and the Discharger may not apply herbicides within 50 feet of any surface waterbody when water is present. The Discharger may not apply herbicides if the National Weather Service predicts a 25% or more chance of rain within 24 hours, the target area has puddles or standing water, or when wind velocity exceeds 10 miles per hour. If the Discharger observes spray to be drifting to a non-target location, the Discharger must discontinue spraying until conditions causing the drift have abated.

36. Livestock used for vegetation management shall be introduced onto riverbed property only after being quarantined outside the city properties for a minimum of 72 hours and fed or grazed on commercially produced bulk feed or agricultural crops so as not to further introduce non-native species. Animals shall be healthy, well-nourished, and free of internal and external parasites. Grazing shall not expose base soil excessively in grassland areas and shall not be conducted when precipitation is occurring or when soils are wet or saturated or subject to compaction.

Mitigation

37. The Discharger must implement the Mitigation Plan described in Section 5: Compensatory Mitigation, in the revised *Annual Drainage Maintenance Report of Waste Discharge Supplemental Information Report* dated January 2021 and the *Mitigation Receiver Sites* selection guidelines submitted January 8, 2020 (Exhibits 10 and 8, respectively). Both documents together are referred to as the Mitigation Plan. Mitigation maintenance shall occur a minimum of once per year during the monitoring and maintenance period until all success criteria are achieved.

38. The following definitions shall apply to the vegetation and habitat types impacted by management activities:

    a. Grassy or herbaceous riparian: predominantly wild oats and annual brome grasses, forbs, and herb species

    b. Low-flow channel: the principal trunk of a river or stream, also known as the main-stem channel.

    c. Active channel: consists of a primary (low-flow or main-stem channel) and one or more secondary channels of varying sizes. The active channel area includes high-flow channels and vegetated islands that are exposed at a normal high-water stage within the braided high-flow channels.

    d. Floodplain: a strip of relatively flat land bordering a stream channel that is inundated at times of high water. For the El Paso de Robles stretch of the Salinas River, areas beyond the active channel and associated riparian edge are floodplain.

39. Mitigation shall be achieved by a combination of removal of non-native vegetation, removal of trash, and habitat rehabilitation and enhancement. Removal of trash must occur from within the low-flow and active channel to count towards mitigation and may only compose a maximum of 25 percent of the required mitigation area. Mitigation shall achieve success criteria described in the Mitigation Plan by the fifth year following mitigation installation. If mitigation measures do not meet their interim or final success criteria, the discharger shall implement remedial measures until such time the interim or final success criteria are met.

40. Mitigation shall be implemented according to the following ratios:

    a. The minimum required rehabilitation to impact ratio for the impacts categorized as trimming of riparian vegetation within the low-flow channels is 1:1. The minimum required rehabilitation and enhancement to impact ratio for the impacts categorized as trimming of tree and shrub canopy within the active channel is 1:1. Mitigation for both of these types of impacts is not permitted to be implemented in areas that will be subject to future fire fuel load reduction activities.

    b. For rehabilitation or enhancement implemented in areas that will not be subject to future fire fuel load reduction activities, the minimum required rehabilitation or enhancement mitigation to impact ratio for the impacts categorized as trimming of tree and shrub canopy within the floodplain is 0.5:1.

c. For rehabilitation or enhancement implemented within the Salinas River channel where future fire fuel load reduction will be managed by grazing for control of grasses only, minimum required rehabilitation or enhancement to impact ratio for the impacts categorized as trimming of tree and shrub canopy within the floodplain is 0.5:1.

d. For rehabilitation or enhancement implemented within the Salinas River channel where future fire fuel load reduction will be managed by mechanical means, minimum required rehabilitation or enhancement to impact ratio for the impacts categorized as trimming of tree and shrub canopy within the floodplain is 1:1.

e. The Discharger shall mitigate for the removal of native trees or shrubs four inches or greater in diameter at breast height by replacing in kind at a 3:1 ratio.

f. No mitigation is required for impacted waters categorized as grassy or herbaceous riparian habitat.

g. No mitigation is required for area of invasive plants removed.

41. In the annual report submitted prior to implementation of mitigation (no later than December 31, 2023), the Discharger shall identify final selected mitigation sites and provide an amended mitigation proposal for Central Coast Water Board Executive Officer review and approval. The Discharger shall implement the approved mitigation proposal.

42. The Discharger must complete installation of mitigation no later than December 31, 2024. Delays in implementing mitigation require an increase in mitigation area by 0.01 acre per 0.1 acre of impact for each month of delay.

43. If at any time during the implementation and establishment of planted or graded mitigation areas and prior to verification of meeting success criteria, a catastrophic natural event (e.g., fire, flood) occurs and impacts the mitigation area, the Discharger is responsible for implementing mitigation so that no net loss of aquatic resource habitat or beneficial uses occurs as a result of Project activities. The Discharger may pursue alternative compliance by submitting an amended Mitigation Plan for written approval from the Central Coast Water Board Executive Officer.

44. Mitigation sites located outside the Salinas River channel and floodplain shall be located on city property and/or properties protected from development in perpetuity. A conservation easement or other appropriate legal limitation must prohibit, without exception, all residential, commercial, industrial, institutional, and transportation development, vegetation maintenance, and any other

infrastructure development that would not maintain or enhance the habitat functions and values of the mitigation site. Other infrastructure development to be prohibited includes, but is not limited to, additional utility lines, paved maintenance roads, and areas of maintained landscaping for recreation.

45. Mitigation sites located within the Salinas River channel and floodplain shall be located on city property and/or properties protected from development in perpetuity. A conservation easement or other appropriate legal limitation must prohibit, without exception, all residential, commercial, industrial, institutional, and transportation development, and any other infrastructure development that would not maintain or enhance the habitat functions and values of the mitigation site. Other infrastructure development to be prohibited includes, but is not limited to, additional utility lines, paved maintenance roads, and areas of maintained landscaping for recreation. Vegetation maintenance shall not be permitted to be conducted in a manner that will prevent the site from meeting mitigation success criteria. The City of El Paso de Robles Fire Department shall be consulted on locations and species to ensure that habitat rehabilitation and enhancement do not contribute to fire risk and will not need to be removed in the future.

46. No plant species on the most recent California Invasive Plant Council (Cal-IPC) list "Exotic Pest Plants of Greatest Ecological Concern in California"[2] may be planted in mitigation areas, waters of the state, vegetated stormwater best management practice areas, or other areas used to convey urban runoff and stormwater.

47. The Discharger must take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this order, including such accelerated or additional monitoring as may be necessary to determine the nature and impact of the noncompliance.

Monitoring

48. The Discharger shall comply with Monitoring and Reporting Program No. R3-2021-0012 (included as part of this order).

Site Access and Information Requirements

49. The Discharger must allow personnel of the Central Coast Water Board and authorized representatives, upon the presentation of credentials and other documents, as may be required by law, to do the following:

[2] The Cal-IPC list may be found on-line at http://www.cal-ipc.org/.

a. Enter upon the premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this order;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this order;

c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this order;

d. Sample, photograph, and monitor at reasonable times, for the purpose of ensuring compliance with this order.

50. The Discharger must furnish, within a reasonable time, any information related to the implementation of the Project and compliance with this order that the Central Coast Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating coverage under this order. The Discharger must also furnish to the Central Coast Water Board, upon request, copies of records required to be kept by this order.

51. All reports, notices, or other documents required by this order or requested by the Central Coast Water Board must be signed by a responsible city employee such as (1) the public works director or city manager; (2) a stormwater program manager or fire chief of the City of El Paso de Robles in charge of a public service; (3) any other person who performs similar functions for the City of El Paso de Robles; or (4) by a duly authorized representative of that person.

52. Any person signing a document under this order or the associated monitoring and reporting program must make the following certification: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

53. After notice and opportunity for a hearing, discharges under this order may be terminated or modified for cause, including, but not limited to, the following:

a. Violation of any term or condition of this order;

b. Obtaining this order by misrepresentation or failure to disclose all relevant facts;

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

Standard Provisions

54. This order is not transferable to any person except after notice to the Central Coast Water Board. In accordance with California Water Code section 13260, the Discharger must file with the Central Coast Water Board a report of any material change or proposed change in the ownership, character, location, or quantity of this waste discharge. The notice must include a written agreement between the existing and new dischargers containing a specific date for the transfer of this order's responsibility and coverage between the current Discharger and the new discharger. This agreement must include an acknowledgment that the existing Discharger is liable for violations up to the transfer date and that the new discharger is liable from the transfer date on. The Central Coast Water Board may require modification or revocation and reissuance of this order to change the name of the dischargers and incorporate such other requirements as may be necessary under the California Water Code.

55. Any proposed material change in operation must be reported to the Central Coast Water Board at least 30 days in advance of the proposed implementation of any change. This must include, but not be limited to, all significant new soil disturbances, all proposed expansion of maintenance, or any change in drainage characteristics at the project site. For the purpose of this order, this includes any proposed change in the boundaries of the wetland/waters of the state fill sites. The Central Coast Water Board may require modification or revocation and reissuance of this order to change any requirements in this order and incorporate such other requirements as may be necessary under the California Water Code.

56. The Discharger must maintain a copy of this order at the project site so as to be available at all times to site operating personnel and agencies.

57. This order does not authorize commission of any act causing injury to the property of another or of the public; does not convey any property rights; does not remove liability under federal, state, or local laws or regulations or rules of other programs and agencies; nor does this order authorize the discharge of wastes without appropriate permits from other agencies or organizations.

58. This order authorizes project activities only until December 31, 2025. The Central Coast Water Board will consider reissuance of this order upon submittal of the final annual report and demonstration of successful installation of required compensatory mitigation. Compensatory mitigation implementation, monitoring, maintenance, and reporting requirements and conditions of this order remain in effect until the Discharger complies with all such requirements and conditions.

59. The filing of a request by the Discharger for the modification, revocation and reissuance, or termination of this order or notification of planned changes or anticipated noncompliance do not stay any condition of this order.

NOTIFICATIONS

60. The technical and monitoring reports identified in this order are required pursuant to California Water Code section 13267. The Central Coast Water Board needs the requested information to determine the extent of impacts to water quality and beneficial uses from Project activities, to evaluate the effectiveness of implementation of required mitigation, and to ensure compliance with this order. The Discharger is required to submit this information because it is the entity that conducts the Project and, according to the ROWD, Project activities have resulted in and will continue to result in discharges to waters of the state that have the potential to affect water quality and beneficial uses. The requirements of this order are also based on the Discharger's CEQA documentation that identify actions and mitigation measures. The total cost of all required annual reporting according to this MRP is estimated to be approximately $84,500. Given the significance of the potential impacts of the activities on water quality, the burden, including costs, of the annual monitoring reports bears a reasonable relationship to its need and the benefits to be obtained. The evidence supporting the need for the reports required by this order is set forth in this order and in the Central Coast Water Board's public file on this order.

61. These requirements have not been reviewed by the United States Environmental Protection Agency and are not issued pursuant to section 402 of the Clean Water Act.

62. The provisions of this order are severable, and if any provision of this order or the application of any provision of this order to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this order shall not be affected thereby.

ENFORCEMENT

63. Violations of these waste discharge requirements may result in enforcement actions as authorized under the California Water Code.

64. All technical and monitoring reports submitted pursuant to this order are required pursuant to section 13267 of the California Water Code. According to section 13268 of the California Water Code, any person failing or refusing to furnish technical or monitoring reports or falsifying any information provided in such reports is guilty of a misdemeanor and may be civilly liable. Failure to submit reports in accordance with schedules established by this order or attachments to

this order or failure to submit a report of sufficient technical quality to be acceptable to the Executive Officer may subject the Discharger to enforcement action pursuant to section 13268 of the California Water Code.

CERTIFICATION

This order becomes effective on the date of adoption by the Central Coast Water Board.

I, Matthew T. Keeling, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an order adopted by the California Regional Water Quality Control Board, Central Coast Region on April 16, 2021.

_____

Matthew T. Keeling
Executive Officer

ATTACHMENT B. DORMANT WILLOW OR COTTONWOOD SPRIG INSTALLATION (CDFW 2003)

Dormant Willow or Cottonwood Sprig Installation

Willows and cottonwoods are in the willow family (*Salicaceae*) and are generally adapted to bankfull channel environments. Species in this family form specialized roots along their stems, allowing for vegetative reproduction in riparian corridors. This feature makes them good candidates for installation as sprigs or dormant cuttings. In general, willows need significant amounts of light and a year-round source of moisture. They are good candidates for revegetation as long as their root zone remains moist during the summer. Because of their ability to withstand flood flows, they are often a good choice for bank stabilization projects in bankfull channel areas. There are many varieties of willow and cottonwood in California. Some (such as the curly willow and Lombardy poplar) are not native and should never be planted in riparian areas. They may not supply the same habitat values as the native plants, and may hybridize with them. Cuttings should be harvested from a variety of parent plants in order to avoid out-planting genetically identical material. These techniques result in a more successful project, will ensure genetic diversity, and do the least damage to the collection site.

Sharp, clean loppers produce high quality sprigs and cuttings

Typical dimensions for willow and cottonwood sprigs

Steps required to install dormant willow and cottonwood cuttings:

- Harvest cuttings during the winter months when plants are dormant (usually December-January). Although willows and cottonwoods will grow from cuttings at other times of the year, dormant cuttings are more resistant to disease, have higher survival rates, and do not require irrigation if planted in the appropriate location. Sprigs may be harvested using sharp, clean loppers, hand shears, or a chainsaw. The cuttings

Store cuttings in a moist environment

may be collected at a range of sizes (i.e., ½ inch to 4 inches diameter and up to 8 feet long). It is important to select material that has not become too woody, and that has several viable buds along the stem.

- Cuttings may be used immediately, stored on-site in the stream, or stored off-site in a bucket of cool water. Ideally, material should be harvested and installed the same day.

- Sprigs should be installed with buds pointing up, with approximately ¾ of the cutting in the soil, and ¼ exposed. Holes may be dug with a pick, with a piece of rebar, with an auger, or a backhoe (for large material). In areas with soft soil, you may avoid digging a hole by cutting the bottom at an angle and pounding it into the ground with a small sledge hammer. If the top is damaged by the hammer, cut off the top of the sprig to allow for clean healing or place a driving shield over the top to drive in the sprig.

Auger used for planting holes

Small sledge hammer for installing sprig

Clean, sharp loppers cut off damaged top of sprig

ATTACHMENT C. PROTOCOL FOR NON-NATIVE INVASIVE PLANT REMOVAL

- Tree of heaven (TOH) would be removed by hand with chainsaws and/or loppers. A tracked chipper may be used to break down cut material onsite. Many tree of heaven plants have resprouted as young sapling/shoots (Photo 1).

Photo 1. Tree of heaven saplings growing in the Salinas River floodplain, west of River Road, October 2021.

- The roots would be left in the ground to avoid destabilizing the soil. To prevent the unintentional propagation of invasive species, cut material would be removed from the riparian zone and disposed of at a landfill.
- TOH would be cut when mature seeds are not on the trees, to avoid spreading seeds. Small cut shoots would be left to decompose naturally on ground surface.
- Access to TOH removal areas will be achieved using existing routes and parking areas, since all mapped sites are within the floodplain, no bed, bank, or river crossing would be warranted.
- Herbicide application would be applied directly and immediately after cut.
- Rain predictions would be checked for pre- and post- removal conditions. If a 25 percent or more chance of rain is forecasted within 24 hours of scheduled removal, then removal activities will be rescheduled to avoid any potential soil contamination.
- Cut stumps of TOH shall be inspected annually in the spring or late summer for signs of re-sprouting for three years after cutting. If cut stumps are resprouting, herbicide may be used. Herbicide treatment would be reapplied following inspection if resprouting occurs.
- Herbicide application may only be made by a licensed herbicide applicator using materials recommended by a licensed Pest Control Advisor (PCA). Herbicides will be applied to cut stumps using a localized spot-treatment method (spraying cut stumps using a wand applicator or painting cut stumps using a brush applicator) and applied in a manner that will eliminate drift onto native plants. In all such cases, the minimum amount required to kill the target species and limit adverse effects to sensitive species and habitats will be used. Since herbicide type and amounts needed are dependent on species, site condition, weather, and season, a

licensed PCA will be consulted prior to herbicide use. For any portions that may occur within 30 meters of standing water, the PCA will use herbicides approved by the Environmental Protection Agency (EPA) for use near wetlands and streams, such as glyphosate-based Rodeo®.

- The contractor must have a pest control business license which requires that at least one individual employed by the business be in possession of a qualified applicator's license. All licenses must be issued by the State of California and be of current status. If a qualified applicator is not present during the herbicide treatment, all applicators must have undergone documented herbicide application training. Personnel must wear all protective clothing required by law and follow all label directions and precautions. All re-entry times specified on an herbicide label will be observed and posted. The applicator must comply with all state and local regulations regarding the application of herbicides. Weed control personnel shall be provided with protective equipment including gloves and face masks.

ATTACHMENT D. MONITORING AND REPORTING PROGRAM FOR ORDER NO. R3-2021-0012

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

Monitoring and Reporting Program
No. R3-2021-0012

For

CITY OF EL PASO DE ROBLES ANNUAL FLOOD CONTROL AND FIRE FUEL LOAD REDUCTION PROJECT SAN LUIS OBISPO COUNTY

This Monitoring and Reporting Program No. R3-2021-0012 (MRP) is issued to the City of El Paso de Robles (Discharger) and required by the Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board). The monitoring and reporting requirements described herein are made pursuant to California Water Code section 13267. Pursuant to section 13268 of the California Water Code, a violation of California Water Code section 13267 requirements may subject you to civil liability of up to $1,000 per day for each day in which the violation occurs.

MONITORING

Visual

1. Visual pre-activity surveys shall be conducted annually by a qualified biologist with training and experience in assessing impacts to riparian and aquatic habitat in all proposed maintenance areas. The surveys shall identify within proposed maintenance areas all sites with the potential to harbor rare, threatened, or endangered species and shall identify sensitive resources, including, at a minimum, flow channels, riparian vegetation associated with flow channels, wetlands, and surface water.

2. Prior to the start of annual fuel reduction maintenance activities along the Salinas River, a qualified biologist shall assess the understory vegetation in areas proposed for vegetation maintenance, especially in areas where the understory vegetation is dense or located under the canopy of trees. Sample transects within proposed maintenance areas shall be conducted and shall assess vegetation characteristics, including fire fuel loading, density, percent cover, and dominant species.

3. After fuel reduction vegetation maintenance is completed, if any fuel treatment activities occurred in areas under dense tree canopy such that aerial drone photography cannot detect the area of shrub canopy reduction, a qualified biologist shall visually assess the same transects as were assessed during pre-activity surveys.

4. A qualified biologist shall visually monitor downstream receiving water turbidity levels during sediment removal activities in the Scott Creek Basin and Westfield Drainage if water is present.

5. The Discharger or its contractors must consistently visually monitor livestock used in prescribed herbivory to ensure they are restricted to assigned areas.

6. The Discharger or its contractors must visually monitor crossings over dry high-flow channels to ensure that no sediment is pushed into the channel from turning or from moving up or down banks.

7. The Discharger or its contractors must visually inspect all maintenance sites and areas of the channel adjacent to maintenance sites following completion of maintenance activities and for one subsequent rainy season (following a rain event of 0.5 inches or greater) to ensure that maintenance activities are not causing excessive erosion or other water quality problems. If excessive erosion or other water quality problems are observed, monitoring shall continue until the Project is no longer causing excessive erosion, stream instability, or other water quality problems.

8. Mitigation will be implemented according to Section 5: Compensatory Mitigation, in the revised *Annual Drainage Maintenance Report of Waste Discharge Supplemental Information Report* dated January 2021 (Exhibit 9) and the *Mitigation Receiver Sites* selection guidelines submitted January 8, 2020 (Exhibit 7). Both documents together are referred to as the Mitigation Plan. Monitoring of all mitigation areas shall be conducted as described in the Mitigation Plan. The Discharger shall monitor invasive species removal locations for three years after treatment and or removal. The Discharger or its contractors shall monitor the compensatory mitigation sites for five years. If success criteria are not achieved within that time, the Discharger shall continue annual monitoring and maintenance until success criteria are achieved. Compensatory mitigation monitoring shall include assessment of growth, survival, general health and stature, signs of resprouting of non-native trees and giant reed, progress towards achieving success criteria, and any other measures identified in the Mitigation Plan.

Photo Monitoring

9. The Discharger must conduct photo monitoring of the pre-determined photo points for annual drainage maintenance and at Salinas River vegetation maintenance locations, both before and after vegetation maintenance.

10. Aerial photography via drone will be implemented to measure fuel reduction vegetation maintenance activities in the Salinas River. Shrub and tree canopy vegetation impacts due to Project activities shall be quantified by before and after aerial imagery or other monitoring efforts.

11. The Discharger must conduct photo monitoring of all of the Project's associated mitigation areas at the same frequency as required for visual monitoring described in the Mitigation Plan.

REPORTING

General Requirements

1. The Discharger shall retain records of all monitoring information, including all calibration and maintenance records, copies of all reports required by this MRP and order, training records, and records of all data used to complete the application for this MRP and order. The Discharger shall maintain records for a minimum of five years from the date of the sample, measurement, report, or application. This period may be extended during the course of any unresolved non-compliance regarding this discharge or when requested by the Central Coast Water Board.

2. The Discharger shall forward any final, signed copy of Lake and Streambed Alteration Agreements issued by the California Department of Fish and Wildlife for flood control and annual fire fuel load reduction activities to the Central Coast Water Board immediately upon execution.

3. The Discharger shall furnish to the Central Coast Water Board, within a reasonable time or by the dates specified in the Order, any information related to the implementation of the Project and compliance with this order that the Central Coast Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this MRP and/or order. The Discharger shall also furnish to the Central Coast Water Board, upon request, copies of records required to be kept by this MRP and order.

4. Where the Discharger becomes aware that it failed to submit any relevant information or submitted incorrect information in a report of waste discharge or in any report to the Central Coast Water Board, it shall promptly submit such information.

5. The Discharger shall report any discharge of waste that may endanger public health or the environment. Such a condition includes, but is not limited to, a violation of the conditions of this order, a significant spill of petroleum products or hazardous chemicals, or damage to control facilities that would cause noncompliance with the order or this MRP. Any information shall be provided orally to Central Coast Water Board staff within 24 hours of the time the Discharger becomes aware of an occurrence that does not comply with the order. Pursuant to California Water Code section 13267(b), a written report shall also be submitted to Central Coast Water Board staff within five consecutive days of the time the Discharger becomes aware of the occurrence. The written report shall contain (a) a description of the noncompliance and its cause; (b) the period of the noncompliance event, including dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and (c) steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The Discharger shall be responsible for obtaining any additional permits necessary for implementing plans for restoration to prevent further water quality problems

6. Should the Discharger determine that Project implementation activities are not meeting the conditions of this MRP and order, the Discharger must immediately notify the Central Coast Water Board and correct Project implementation activities.

Annual Workplan

7. The Discharger shall provide the Central Coast Water Board with an annual workplan by March 15 of each year during active maintenance activities. The report must include:

    a. An assessment of drainages according to the thresholds identified in the *Annual Drainage Maintenance Report of Waste Discharge Supplemental Information Report* (Exhibit 9) and *Desired Conditions for Fuel Beds within the Salinas River Fuels Reduction Project* document (Exhibit 10) to identify specific areas where activities are proposed that calendar year and to describe which maintenance methods will be used at each location. The Discharger shall not begin vegetation maintenance unless written approval has first been obtained from the Central Coast Water Board Executive Officer.

    b. A schedule of maintenance activities. The schedule shall identify all locations and anticipated date range of maintenance at each location.

    c. A Wet Weather Preparedness Plan for work scheduled to occur each year between April 14 and June 1. The Wet Weather Preparedness Plan shall be submitted with the annual workplan and shall include the identification and mapping of proposed annual work locations, associated

site-specific best management practices to be implemented (including, at a minimum, removal of equipment and materials from the water bodies prior to rain, sediment and erosion controls, stockpile and trash covering, and waste management), identification of staff responsible for implementing the preparedness plan, and steps for the monitoring and maintenance of best management practices at each site.

Annual Reporting

8. The Discharger shall provide the Central Coast Water Board with an annual report by December 31 of each year during maintenance activities and each year for five years after the conclusion of maintenance activities for mitigation monitoring. The report must include:

    a. A summary of all pre- and post-maintenance surveys conducted in accordance with this monitoring and reporting program, including both visual and photo monitoring. The Discharger must qualitatively and quantitatively compare post-maintenance surveys with pre-maintenance surveys and the flood fuels loading objectives. Shrub and tree canopy vegetation impacts due to project activities shall be quantified by before and after aerial imagery and included in the annual report except in years where impacts are limited to grazing or treatment of grasses and/or weedy forbs.

    b. A description of the condition of the Project area and mitigation areas based on visual monitoring as required by this monitoring and reporting program and as described in the Mitigation Plan.

    c. The updated quantity of impacts for each impact type, according to the metrics described in the report of waste discharge, including a completed Impacts Quantification Table (Exhibit 6).

    d. The quantity of mitigation required to compensate for Project impacts occurring since the commencement of Project maintenance activities, the quantity of mitigation implemented since the commencement of project maintenance activities, progress towards mitigation success criteria at each mitigation location, and the quantity of mitigation that remains to be implemented in order to satisfy mitigation requirements for all impacts to-date.

    e. A description of any maintenance needs or other problems at any mitigation site, including proposed steps to correct the problems and corrective actions already taken by the Discharger.

    f. In the annual report submitted prior to implementation of mitigation (no later than December 31, 2023), the Discharger shall identify final selected

mitigation sites and provide an amended mitigation proposal for Central Coast Water Board Executive Officer review and written approval.

g. Mitigation reporting, if mitigation installation has started, including the following information:

    i. Date of initiation of mitigation installation and date mitigation installation was completed;

    ii. If mitigation installation was completed, confirmation that mitigation was installed according to the requirements of this order and as described in the Mitigation Plan;

    iii. Analysis of monitoring data collected in the field;

    iv. Quantification of growth, survival, general health and stature, signs of resprouting of non-native trees and giant reed and documentation of progress toward achieving all mitigation performance criteria;

    v. Qualitative and quantitative comparisons of current mitigation conditions with preconstruction conditions and previous mitigation monitoring results;

    vi. Any remedial or maintenance actions taken or needed;

    vii. Any additional information specified in the Mitigation Plan; and

    viii. Annual photo-documentation representative of all mitigation areas, taken from vantage points from which the Central Coast Water Board can identify changes in size and cover of plants. The Discharger must compare photos of installed mitigation with photos of the mitigation areas prior to installation.

h. If mitigation is complete, documentation that all required mitigation monitoring and maintenance has been conducted and all success criteria achieved according to the requirements of this order and as described in the Mitigation Plan. If the monitoring period is over, but not all success criteria have been achieved, the annual report shall identify corrective measures to be undertaken, including extension of the monitoring period until the criteria are met.

Amendment Requests

The Discharger must submit any request for amendment of the approved MRP in writing to the Central Coast Water Board Executive Officer. The Discharger may not modify operations until the Discharger has received written notification that the Central Coast Water Board Executive Officer has approved the amendment. If the Central Coast

Water Board Executive Officer does not reject the requested amendment within 45 days of receiving written notification, the changes to the approved MRP may be implemented as described in the requested amendment.

Information Submittal

The Discharger must submit monitoring data and reports electronically. The documents shall be in a searchable PDF format (less than 10 MG in size) and emailed to the Central Coast Water Board staff member overseeing the Project and to RB3_401reporting@waterboards.ca.gov. PDF documents that exceed 10MB should be transferred to a disk and mailed to the Central Coast Water Board at:

401 Program
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

The Executive Officer may rescind or revise this MRP at any time

Ordered by:

_____

Matthew T. Keeling, Executive Officer