

COASTAL CONSERVANCY

Staff Recommendation  
May 27, 2021

**SAN FRANCISCO ESTUARY INVASIVE SPARTINA PROJECT**

Project No. 99-054-03

Project Manager: Marilyn Latta, Erica Johnson

**RECOMMENDED ACTION:** Authorization to disburse up to \$950,000, to be reimbursed by the United States Fish and Wildlife Service National Coastal Wetlands Conservation Grant Program, to the California Invasive Plant Council for the planning, management, treatment, monitoring, restoration, and permit compliance activities of the San Francisco Estuary Invasive *Spartina* Project.

**LOCATION:** The baylands and lower creek channels of the nine counties that bound the San Francisco Bay.

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EXHIBITS

- Exhibit 1: [Project Location Map](#)  
Exhibit 2: [Detailed NCWC ISP regions map](#)  
Exhibit 3: [May 16, 2019 Staff Recommendation](#)
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**RESOLUTION AND FINDINGS**

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes disbursement of up to nine hundred fifty thousand dollars (\$950,000), to be reimbursed by the United States Fish and Wildlife Service National Coastal Wetlands Conservation Grant Program, to the California Invasive Plant Council (“the grantee”) for the planning, management, treatment, monitoring, restoration, and permit compliance activities of the San Francisco Estuary Invasive *Spartina* Project.

Prior to disbursement of these funds, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.

4. Evidence that all permits and approvals required to implement the project have been obtained.

In carrying out any treatment or enhancement project, the grantee shall comply with all applicable mitigation and monitoring measures that are set forth in the approved site-specific plans, that are required by any permit, the applicable U.S. Fish and Wildlife Service Biological Opinion or any other approval for the project, and that are identified in the “Final Programmatic Environmental Impact Statement/Environmental Impact Report, San Francisco Estuary Invasive Spartina Project: Spartina Control Program” (EIS/R), adopted by the Conservancy on September 25, 2003.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 4.5 of Division 21 of the Public Resources Code, regarding the resource goals of the San Francisco Bay Area Conservancy Program
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The California Invasive Plant Council is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.
4. No new environmental documentation is required for the activities under the proposed authorization, since the activities are within the scope of the EIS/R, and, pursuant to CEQA Guidelines Section 15162 (14 Cal. Code Regs. § 15162), do not involve any new effects or new mitigation measures beyond those identified in the EIS/R.

## **STAFF RECOMMENDATION**

### **PROJECT SUMMARY:**

Staff recommends the Conservancy authorize disbursement of up to \$950,000 of United States Fish and Wildlife Service (USFWS) National Coastal Wetlands Conservation (NCWC) Grant Program funds to the California Invasive Plant Council (“the grantee” or CAL-IPC) for the planning, management, treatment, monitoring, restoration, and permit compliance activities of the San Francisco Estuary Invasive *Spartina* Project (ISP). See Exhibits 1 and 2 for maps showing the overall project location and the specific treatment sites.

The Conservancy and USFWS San Francisco Bay National Wildlife Refuge Complex partnered in 2000 to become the state and federal leads on the ISP, a region-wide coordinated effort involving dozens of partners to eradicate invasive cordgrass from San Francisco Bay and protect regional restoration projects and the native tidal marsh ecosystem. Non-native *Spartina* invades both tidal mudflats and tidal marshes; it has been documented to change the physical structure and plant species of the marsh and degrade values for native species. As of 2020 treatment, the

ISP has achieved 96% control of the invasion and is approaching eradication. However, passive recruitment of key native plant species is limited at the previously invaded marshes, and revegetation plantings are critical to reestablishing vegetative structure that provides habitat, food resources, and high tide refugia. These enhancement plantings are particularly important in the coming decades of sea level rise, providing native marsh vegetation a greater chance to establish and persist, not only for habitat benefits but also to protect tidal wetlands and adjacent shorelines from wave action and erosion. The Conservancy has supported the ISP treatment since 2000 and continues to seek external grant funds to leverage its own contributions. This authorization remains consistent with the Conservancy's May 18, 2019 authorization (Exhibit 3), under which funds will be expended as planned as of June 2021. Staff estimates that the subject grant funds and a separate \$4,000,000 San Francisco Bay Restoration Authority (SFBRA) grant to CAL-IPC will provide the minimum amount necessary to meet all ISP activities through May of 2023.

ISP activities conducted under the 2019 authorization include a successful invasive *Spartina* monitoring and treatment season in 2019-20, rail monitoring in 2019-2021, and restoration enhancements in winter 2019-20 and winter 2020-21 (underway now). For a complete description of activities conducted from June 2019- June 2021, please see Exhibit 3.

This authorization will fund all planning, implementation, and monitoring for invasive *Spartina* treatment within three regions and native *Spartina* revegetation in four regions, throughout the 70,000-acre project area (see Exhibit 2). The revegetation will include installation of a minimum of 40,000 native tidal marsh seedlings during two seasons (2021-22 and 2022-23). This work will occur from June 2021 through May 2023.

**Site Description:** The project area includes three regions in the north bay and four regions in the south bay (please see Exhibit 2 project map). These areas include tidal wetlands and mudflats, and the sites range in size from 50 to 900 acres. For full description, please see Exhibit 3 and prior staff recommendations. The seven regions include Robert's Landing (City of San Leandro), Hayward Regional Shoreline (East Bay Regional Park District), Eden Landing Ecological Reserve (CA Department of Fish and Wildlife), Bai Island Ecological Reserve (CDFW/Don Edwards SF Bay National Wildlife Refuge), East Marin (more than 100 private landowners), Petaluma (CDFW and others), and San Pablo Carquinez (City of San Pablo and others). The grant funded activities in these seven regions total 2,270 acres of enhancement, and the SFBRA grant covers the rest of the 70,000-acre project area which includes all nine counties and more than 150 landowning partners.

**Grant Applicant Qualifications:** CAL-IPC is a 501(c)(3) non-profit organization that works to reduce invasive plants in California. They are a state leader in advancing state policy and coordination on invasive plant issues, including coordination and leadership for quarterly statewide management calls with multiple agencies, as well as leading a successful annual conference that brings together hundreds of practitioners and agency staff engaged in invasive plant prevention and control. They have a strong track record in invasive plant work and have worked successfully with the Conservancy on the ISP since 2019.

**CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

**Required Criteria**

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section below.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section below.
3. **Promotion and implementation of state plans and policies:** The ISP remains consistent with the San Francisco Bay Conservation and Development Commission's "San Francisco Bay Plan", as described in the May 18, 2019 staff recommendation (Exhibit 3).
4. **Support of the public:** The ISP is supported by USFWS, CDFW, East Bay Regional Park District, San Mateo County Mosquito Abatement and Control District, SF Bay Joint Venture, City of San Leandro, and many other partners. Please see Exhibit 6 of the May 18, 2019 staff recommendation (Exhibit 3).
5. **Location:** The ISP treatment and revegetation areas remain located within the nine-county San Francisco Bay Area, consistent with Section 31162 of the Public Resources Code.
6. **Need:** SF Bay wetlands are threatened by invasive Spartina, and the project is at a critical stage towards eradication. Approval of this work funded by external grants is needed to continue sustained efforts in monitoring, treatment, and native revegetation.
7. **Greater-than-local interest:** Please see the May 18, 2019 staff recommendation (Exhibit 3).
8. **Sea level rise vulnerability:** Please see the May 18, 2019 staff recommendation (Exhibit 3).

**Additional Criteria**

9. **Urgency:** It is critical and time-urgent to continue towards completion of eradication of invasive Spartina in San Francisco Bay because invasive Spartina reduces habitat quality and native biodiversity in tidal wetlands and mudflats. If the ISP can't continue the trajectory towards eradication, the substantial work to date is at risk of rehybridization and the investment in all tidal wetlands restoration in SF Bay is at risk.
10. **Leverage:** See the "Project Financing" section below.
11. **Readiness:** The Project is permitted, ongoing and ready to go with acceptance of grant funds to support field activities.
12. **Return to Conservancy:** See the "Project Financing" section below.
13. **Cooperation:** There is a longstanding network of more than 150 local, state, and federal partners in all nine counties that work together to accomplish the ISP. Project benefits include education and outreach with a broad network of resource agency staff, restoration practitioners, and landowners around San Francisco Bay.

**PROJECT FINANCING**

USFWS ( <i>via</i> a grant to the Conservancy)	\$950,000
SF Bay Restoration Authority	\$4,000,000
<b>Project Total</b>	<b>\$4,950,000</b>

The project total in the table above represents approximately two additional years of ongoing ISP work. Unless specifically labelled “Required Match” the other sources of funding listed above are provided as estimates. The Coastal Conservancy does not typically require matching funds nor does it require documentation of expenditures from other funders. Typical grant conditions require Grantees to provide any funds needed to complete the project.

The USFWS NCWC funds will be provided via a \$1,000,000 grant to the Conservancy, and the Conservancy will sub-grant \$950,000 to CAL-IPC and retain \$50,000 for support.

CAL-IPC has received a \$4,000,000 grant from the SFBRA for the Project, of which \$1,000,000 will be used as match for the FWS NCWC grant.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

As detailed in the May 18, 2019 staff recommendation (Exhibit 3), the ISP remains consistent with Chapter 4.5 of Division 21 of the Public Resources Code, Sections 31160-31165.

**CONSISTENCY WITH CONSERVANCY’S [2018-2022 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):**

Consistent with the objectives listed below for the Conservancy’s 2018-22 Strategic Plan, the proposed project will further the Invasive *Spartina* Project by continuing progress towards zero-detection and promoting monitoring and management by landowners and other partners.

Consistent with **Goal 8, Objective B**, the project will plan native revegetation projects in San Francisco Bay, advancing the planning and design of adaptation projects to increase resilience to sea level rise and other climate change impacts. Consistent with **Objective C**, the project will implement these projects to increase resilience to sea level rise or other climate change impacts using nature-based solutions and other multi-benefit strategies.

Consistent with **Goal 12**, the ISP helps “protect and enhance natural habitats and connecting corridors, watersheds, scenic areas, and other open-space resources of regional importance in the Bay Area,” and the ISP meets **Objective 12D**, “enhance tidal wetlands, managed wetlands, seasonal wetlands, upland habitat, and subtidal habitat,” and **Objective 12G**, “eradicate non-native invasive species that threaten important habitats in the San Francisco Bay Area.”

Consistent with **Goal 15, Objective C**, the ISP involves working “with partner organizations to achieve conservation, climate adaptation, and public access objectives through project facilitation, technical assistance, grant writing, workshops, webinars, and the development and

sharing of scientific and management resources, including lessons learned from innovative, multi-objective projects.”

**CEQA COMPLIANCE:**

As detailed in the May 18, 2019 Conservancy staff recommendation (Exhibit 3), at its June 16, 2005 meeting, the Conservancy authorized initial funding for treatment and eradication of invasive *Spartina* at 22 project sites and certified a “Final Programmatic Environmental Impact Statement/Environmental Impact Report, San Francisco Estuary Invasive *Spartina* Project: *Spartina* Control Program” (FEIS/R), prepared for the ISP pursuant to the California Environmental Quality Act (CEQA). Subsequently, the Conservancy has authorized funding for treatment and eradication projects each year through 2019. In general, over the duration of the ISP, the nature, duration, scope, location and site characteristics of treatment has not changed. Over time, some additional sites and sub-areas have been added as new plants were found but treatment and potential impacts have been reduced because of successful treatment in prior years.

The FEIS/R is a programmatic environmental impact report (Section 15168 of the CEQA Guidelines, 14 Cal. Code of Regulations, Sections 15000 et seq., hereafter “Guidelines”) in that it analyzes the potential environmental effects of implementing the ISP as a whole, rather than the effects of any one or more individual treatment and eradication projects. The program-level FEIS/R identifies mitigation measures that will be applied to reduce or eliminate impacts at various treatment locations, under varying site characteristics and conditions, and using varying methods of treatment.

A subsequent activity that follows under a programmatic environmental impact report that has been assessed and certified pursuant to CEQA (such as the FEIS/R) must be examined in the light of that programmatic report to determine whether an additional environmental document must be prepared. If the agency proposing the later activity finds that the environmental impacts of the later activity and the required mitigation to reduce those impacts were already identified and considered under the program environmental report, the activity can be approved with no further environmental documentation. (CEQA Guidelines, Section 15168(c)). The Guidelines suggest the use of a written checklist or similar device to document the evaluation of the activity to determine whether the environmental effects of the operation were covered in the program environmental impact report.

Whenever additional funding for the ISP treatment has been sought, the Conservancy staff has assessed the proposed treatment using, as the “checklist” suggested by the CEQA Guidelines, site specific plans for each treatment site and mitigation matrices to identify the impacts and required mitigation needed to avoid or reduce those impacts. Based on that information, the Conservancy has concluded in each instance that the environmental effects associated with proposed treatment and the required mitigation to reduce those effects to less than significant

level had been fully considered under the FEIS/R. For purposes of 2021-22 treatment under this proposed authorization, staff has reached the same conclusion.

For purposes of the 2021-22 treatment seasons and subsequent years, the nature, duration, scope, location and site characteristics of the proposed treatment and control work have not changed. Eradication and control efforts will continue in the same areas as in 2020, but at a decreased intensity because of the reduction in invasive Spartina removed in 2020. The 2018 matrix of impacts and mitigation measures (Exhibit 3) continues to apply to and fully detail the impacts and needed mitigation measures for the activities to be undertaken in 2021 and subsequent years under the new funding proposed by this staff recommendation. The matrix also serves to demonstrate that, since there are no new activities and the project remains essentially unchanged, the proposed treatment and control activities in 2021 and in subsequent years will involve only those potential impacts previously identified by the FEIS/R and will not require any new or different mitigation beyond that required by the FEIS/R to avoid or reduce those potential impacts.

Since the project activities proposed for funding under this authorization, including the potential environmental impacts and required mitigation measures, remain unchanged, the proposed authorization remains consistent with the CEQA findings adopted by the Conservancy in connection with the June 16, 2005 authorization for the 22 original treatment sites and with subsequent Conservancy findings made in connection with authorizations for treatment at the new sites added over the years. No further environmental documentation for these treatment activities is required under CEQA.