

COASTAL CONSERVANCY

Staff Recommendation
June 7, 2021

Pala Fuels Reduction Project

Project No. 21-026-01
Project Manager: Mary Small

RECOMMENDED ACTION: Authorization to disburse up to two hundred and fifty thousand dollars (\$250,000) to the Pala Band of Mission Indians to implement a hazardous fuels reduction project within a wildland urban interface on the Pala Band of Mission Indians' Reservation in San Diego County.

LOCATION: Pala Band of Mission Indians reservation lands in San Diego County.

EXHIBITS

Exhibit 1: [Project Location Map](#)

Exhibit 2: [Bureau of Indian Affairs' Environmental Assessment for the Pala Indian Reservation Forest Management Plan](#)

RESOLUTION AND FINDINGS

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

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed two hundred and fifty thousand dollars (\$250,000) to the Pala Band of Mission Indians ("the grantee") to implement a hazardous fuels reduction project within a wildland urban interface on the Pala Band of Mission Indians' Reservation in San Diego County.

1. Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:
 - a. A detailed work program, schedule, and budget.
 - b. Evidence that all permits and approvals required to implement the project have been obtained.

2. The grantee shall submit evidence that it has permission to implement the project from all project site landowners.
3. If the grantee uses the grant funds to purchase equipment costing \$5,000 or more, the grantee shall use such equipment for wildfire-related purposes for the duration of the useful life of the equipment.

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 3 of Division 21 of the Public Resources Code, regarding the Climate Ready Program, and Chapter 5.5 of Division 21 of the Public Resources Code, regarding water quality and habitat in a coastal watershed.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a grant of up to two hundred and fifty thousand dollars (\$250,000) to the Pala Band of Mission Indians (“the grantee”) to implement a hazardous fuels reduction project within a wildland urban interface on the Pala Band of Mission Indians’ Reservation in San Diego County (Exhibit 1). This project will assist in protecting commercial and residential units, infrastructure, facilities, and natural resources of the Pala Band of Mission Indian lands. Treatment activities consist of thinning, hand piling, chipping and pile burning which will assist in reducing the potential loss of human life and damage to property and natural resources on the Reservation. The total treatment area for the project will be across approximately 65 acres along roads and in targeted high fire severity areas throughout the Reservation.

The Pala Fuels Reduction Project is urgently needed due to the increased fire risk associated with droughts and global climate change in California. In east San Diego County, where the Project is located, this fire risk is incredibly high given the dry climate and 2021 drought conditions. Fuels reduction projects are especially needed along wildland urban interfaces where communities are at risk of loss of human life, of damage to infrastructure and homes, and of severe disturbance to natural ecosystem processes. The project will reduce fuels and fuel profiles by removing vegetation along roads and in high severity areas throughout the Pala Band of Mission Indians’ Reservation.

Site Description: The project will occur within the Pala Band of Mission Indians’ Reservation in east San Diego County. The land is held in trust by the United States through Bureau of Indian Affairs (BIA) and the grantee has written permission to conduct the project within BIA land. Project activities will occur within approximately 65 acres of Reservation land.

Grant Applicant Qualifications: The Pala Band of Mission Indians has been successfully administering federal, state, and private grants for over 50 years. The Pala Band of Mission Indians’ tribal government has an accounting department that processes all accounting and grant-specific invoices and expenses following strict accounting guidelines and receives regular outside audits.

The project work will be part of ongoing efforts by the grantee to reduce wildfire intensity and protect the wildland urban interface structures, infrastructure, and habitat. The Pala Environmental Department and Pala Fire Department retains highly qualified staff specialists with PhDs, Master’s degrees, and various state and federal qualifications.

PROJECT FINANCING

Coastal Conservancy	\$250,000
Pala Band of Missions Indians	\$30,000
Project Total	\$280,000

The anticipated source of funding is a Fiscal Year 2020-21 special appropriation from the General Fund to the Conservancy. This appropriation was part of a package of funding for the purpose of urgent wildfire risk reduction. The proposed project is consistent with the anticipated funding source.

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.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The recommended project would be undertaken pursuant to Section 31113 of Chapter 3 of Division 21 of the Public Resources Code, which authorizes the Conservancy to address the impacts and potential impacts of climate change on resources within the Conservancy’s jurisdiction (Section 31113(a)).

Pursuant to Section 31113(b), the Conservancy is authorized to award grants to nonprofit organizations and public agencies to undertake projects that include reducing greenhouse gas emissions, and addressing extreme weather events, sea level rise, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources.

Pursuant to Section 31113(c), the Conservancy must prioritize grants for projects that maximize public benefits and have one of several purposes, including reducing emissions of greenhouse gases.

Consistent with these sections, the proposed project maximizes public benefits and is a priority because it facilitates the reduction of greenhouse gas emissions from increased wildfires due to climate change. Besides reducing greenhouse gas emissions, the public benefits include

improvement of forest health and protection of life, property, public health, water quality, and natural resources.

The proposed project addresses resources within the Conservancy's jurisdiction by improving forest health and reducing the risks of wildfire that would adversely impact water quality and habitat in a coastal watershed (Chapter 5.5 of Division 21 of the Public Resources Code).

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

Consistent with **Goal 8, Objective C** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will implement projects to increase resilience to climate change impacts using nature-based solutions and other multi-benefit strategies.

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 above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Promotion and implementation of state plans and policies:**

The proposed project will help implement:

- [California's Wildfire and Forest Resilience Action Plan](#) (Governor's Forest Management Task Force, January 2021), which calls for activities such as fuels reduction, forest thinning, vegetation management, prescribed fire, shaded fuel breaks, defensible space, and enhancement of fire-prone habitats to reduce fire risk.
- The [California Forest Carbon Plan](#) (CNRA, 2018), which calls for restoration of natural fire regime and forest composition through a multitude of approaches including thinning, prescribed burns, invasive vegetation management, and shaded fuel breaks.
- The [Community Wildfire Prevention & Mitigation Report](#) (Cal Fire, 2019), which urges state and local agencies to implement the goals of the Carbon Forest Plan and lays out recommendations to agencies to increase the scale and pace of management and mitigation actions to improve forest health and resiliency.
- The [Forests and Rangelands Companion Plan, California State Wildlife Action Plan Update](#) (CDFW 2015), which encourages projects that seek to create a healthier and more resilient forest ecosystem.

- The Environmental Goals and Policy Report “A Strategy for California @ 50 Million, Supporting California’s Climate Change Goals” (OPR, 2015), Goal 6 of the Steward and Protect Natural and Working Landscapes section, which calls on the State to “Build resilience into natural systems and prioritize natural and green infrastructure solutions”.
- 4. **Support of the public:** There is enormous public support for wildfire risk reduction. A statewide poll last fall found that 74% of surveyed voters believe that wildfire threat is greater now than in the past.
- 5. **Location:** . The proposed project is located in within the Coastal Conservancy’s jurisdiction.
- 6. **Need:** California is facing unprecedented fire risk due to climate change and a growing populace. The proposed funding was approved to accelerate fire risk reduction projects in advance of next year’s fire season. This funding is needed to initiate this work as soon as possible.
- 7. **Greater-than-local interest:** Minimizing wildfire risk is of statewide significance.
- 8. **Sea level rise vulnerability:** The subject land is situated well above current and projected Year 2100 sea levels.

Additional Criteria

- 9. **Urgency:** California is facing unprecedented fire risk due to climate change and a growing populace. The 2020 fire season broke numerous records. The proposed project is urgently needed to reduce fire risk in advance of the upcoming fire season.
- 10. **Resolution of more than one issue:** This project addresses three major issues: it seeks to reduce wildfire risk, improve forest health, and will be focused on areas where homes and communities are most at risk, the wildland-urban interface (WUI).
- 11. **Readiness:** The project is ready to begin work immediately.
- 12. **Vulnerability from climate change impacts other than sea level rise:** The project will address fire resiliency in the context of anticipated climate change. Fire resilience is a critical issue due to increased average temperatures, reduced marine fog and longer and more severe droughts.
- 13. **Minimization of greenhouse gas emissions:** This project seeks to mitigate GHG emissions from catastrophic wildfires by lessening the fire risk, improving resilience to fire, and improving carbon sequestration.

CEQA COMPLIANCE:

The proposed project will reduce hazardous fuels across approximately 65 acres of land within the Pala Band of Mission Indians’ Reservation. The project involves implementing fuel reductions and fire breaks as part of the Forest Woodland Management Plan for the Pala Reservation. An Environmental Assessment was performed on the Plan in 2012 (Exhibit 2) and was reviewed by the Bureau of Indian Affairs (BIA). The BIA issued a Finding of No Significant

Impact under the National Environmental Policy Act (NEPA) in 2013 covering fuels reduction work on the Pala Reservation as a part of the Forest Woodland Management Plan for the Pala Reservation. Public Resources Code Section 4799.05, subdivision (d), exempts from the requirements of the California Environmental Quality Act (CEQA) state funding for projects involving prescribed fire, thinning or fuel reduction undertaken on federal lands that reduce the risk of high-severity wildfire if those projects have been reviewed under NEPA. This exemption is applicable only if the Secretary for Natural Resources has certified that NEPA and laws that affect management of federal forest lands in California have not been substantially amended since August 31, 2018. The Secretary of Natural Resources has provided that certification on April 12, 2021 (<https://resources.ca.gov/-/media/CNRA-Website/Files/Programs-and-Projects/Forestry/SB-901-Certification.docx>).

Upon approval of the project, Conservancy staff will file a Notice of Exemption.