

COASTAL CONSERVANCY

Staff Recommendation
June 7, 2021

lipay Nation Wildfire Resilience

Project No. 21-034-01
Project Manager: Joel Gerwein

RECOMMENDED ACTION: Authorization to disburse up to \$317,071 to the lipay Nation of Santa Ysabel to reduce fire fuels in undeveloped woodlands and open spaces and create defensible space around buildings, water systems, and roadways on lipay Nation trust lands.

LOCATION: lipay Nation of Santa Ysabel Reservation, San Diego County

EXHIBITS

Exhibit 1: [Project Location Map](#)

Exhibit 2: [Fire Hazard Maps](#)

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 three hundred seventeen thousand seventy-one dollars (\$317,071) to the lipay Nation of Santa Ysabel (“the grantee”) to reduce fire fuels in undeveloped woodlands and open spaces and create defensible space around buildings, water systems, and roadways on lipay Nation trust lands.

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. If the grantee uses the grant funds to purchase equipment costing \$5,000 or more, the grantee shall use such equipment for wildfire-relate 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 and 5.5 of Division 21 of the Public Resources Code, regarding the Climate Ready Program and Integrated Coastal and Marine Resources Protection, respectively.
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 \$317,071 grant to the lipay Nation of Santa Ysabel (“the grantee”) to reduce fire fuels in undeveloped woodlands and open spaces and create defensible space around buildings, water systems, and roadways on lipay Nation trust lands (Exhibit 1). The project goals are to increase wildfire resilience of tribal trust lands by minimizing risk of damage to buildings, preventing vehicle and structure fires from becoming wildfires, ensuring the safety of all Tribal members and guests in the event of an evacuation due to wildfire, providing accessible roads to emergency response agencies and personnel, and assisting in the eradication of invasive species like the gold spotted oak borer beetle that are impacting forest health and increasing wildfire risk.

The project is needed to reduce the risk of loss of life and property due to wildfire, and to enhance the health of tribal woodlands impacted by invasive pests. Tribal trust lands are located in a high fire hazard severity zone (Exhibit 2) and are in need of fuel management to create defensible space around buildings, water systems, and roadways, and to reduce the risk of catastrophic wildfire in open spaces. Tribal woodlands have been severely impacted by an infestation of invasive gold spotted oak borer beetles, which have greatly increased the number of dead and dying trees and increased wildfire risk.

The project would be carried out by a tribal wildfire resilience crew under the direction of the Tribe’s Emergency Readiness Coordinator and Environmental Director. The project has two components: 1) reducing fire fuels in tribal woodlands, and 2) creating defensible space around buildings, water systems and roadways.

Fuel reduction in tribal woodlands will involve thinning trees and shrubs to create enough open space to break up potential horizontal and vertical pathways for the spread of wildfire. The reservation is made up of three tracts, totaling approximately 15,527 acres. The work will start near heavily populated areas on Tract 3 and move on to Tracts 1 and 2. The project does not involve the removal of mature, healthy trees. All limbs and brush that are removed and are smaller than 6 inches in diameter will be chipped and pile burned by the Tribal Fire Department. All wood over 6 inches in diameter will be bucked and split into firewood and distributed to elders, disabled persons, and low-income families, supplementing the Tribe’s existing Low Income Home Energy Assistance Program.

The defensible space work involves progressive fuel reductions according to a three-zone system. In Zone 1, the immediate area (5 ft) surrounding buildings, a 100% fuel reduction will be implemented. In Zone 2, the area between 5 and 50 ft surrounding buildings, the removal of ladder fuels and a 50% fuel reduction will be implemented when warranted. In Zone 3, the area between 50 and 100 ft., the crew will remove fuel to create a scattered landscape with discontinuous fuel. The goal is to create defensible space around the Tribe's 147 buildings and seven public water systems. The crew will reduce fuel by 50% in a 50 ft buffer along all major roadways to increase safety for evacuation and emergency access during wildfires. Across all three defensible space zones and roads, the crew will mow annual grass to a height of 2-4 inches, remove all dead trees, and record dying trees for forest health management purposes and future projects.

Project work is expected to take place over the next year, beginning in Fall 2021 and concluding by Fall 2022.

Site Description: The project area consists of the Iipay Nation of Santa Ysabel's 15,527 acres of trust lands. The Reservation is located on Highway 79, in North San Diego County near Lake Henshaw between the towns of Santa Ysabel and Warner Springs. Historically, the area surrounding the Santa Ysabel Valley was known by the name "Ellykwanan." The original inhabitants who lived in the Santa Ysabel village called themselves "Iipay," "the People." The Iipay are part of the larger Kumeyaay people of present-day San Diego County.

The Santa Ysabel Indian Reservation ranges from 3,200 feet to 5,700 feet in elevation and is part of the San Dieguito River watershed, which drains into the Pacific Ocean. The mountainous topography of the Reservation is home to a wide variety of indigenous plants and trees. Vegetation is a rich mosaic of mixed chaparral on north and western facing slopes and old growth chamise chaparral on several eastern facing slopes near Lake Sutherland, on Whale Mountain, and on the southwestern slope of the Volcan Mountains. Coastal sage scrub is found on many southern facing slopes intermixed with grassland areas. Dense Engelmann oak/coast live oak woodlands surround Lake Sutherland on northern facing slopes and along drainages. Open coast live oak woodlands with a grass understory are present east of Lake Sutherland and within the Santa Ysabel Valley. Average annual rainfall in the area ranges from 18 to 32.5 inches and is sufficient to contribute to dense growth of the chaparral, scrub oak and chamise plant communities. The thick vegetation creates a hazardous fuel load, especially with severe to extreme fire weather conditions created by the Santa Ana winds. There have been over 20 fires in the past 50 years in the project vicinity, three of which burned over 500 acres in the vicinity.

Grant Applicant Qualifications: The Iipay Nation of Santa Ysabel is highly qualified to carry out this project. The Tribe has managed its lands since time immemorial, and currently employs an Emergency Readiness Coordinator and Environmental Director who will supervise the project. The Tribe has successfully managed multiple grants from state and federal agencies for a variety of projects ranging from social services to environmental projects.

PROJECT FINANCING

Coastal Conservancy

\$317,071

Project Total

\$317,071

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.

The Tribe is seeking additional \$68,000 in funding from a CalFire Forest Health Grant to reduce the spread of invasive tree killing beetles and to remove dead or dying trees.

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.

Consistent with **Goal 16, Objective A**, the proposed project benefits a disadvantaged community.

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 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:

All components of the proposed project are categorically and statutorily exempt from environmental review under the California Environmental Quality Act (CEQA) pursuant to the CEQA Guidelines at California Code of Regulations, Title 14, Sections 15301, 15304, and 15269.

All of the activities under the project are in anticipation of a severe fire season creating the need to take additional measures to protect human health and property on the Reservation. As discussed in the section discussing state plans, activities under this project are consistent with the state's Wildfire and Forest Resilience Action Plan to build fuel breaks around vulnerable communities, expand home hardening, defensible space and preparedness planning to create wildfire-adapted communities, and sustain the economic vitality of rural forested areas. Public Res. Code section 21080(b) and section 15269 exempt emergency projects, including: actions necessary to prevent or mitigate for an emergency and emergency repairs necessary to maintain service essential to the public health, safety, or welfare. (Section 15629(b)(c)).

The project component seeking to reduce fire fuels in tribal woodlands is also categorically exempt under section 15304 regarding minor alterations to land. This section exempts projects that require minor alterations in the condition of land, water, and/or vegetation. This component of the project involves the removal of standing dead trees and pruning or removal of sick trees infested with Gold Spotted Oak Borer Beetles to increase wildfire resilience and slow the spread of these invasive beetles. The project does not involve the removal of mature, healthy trees.

The project component creating defensible space around buildings, water systems and roadways is categorically exempt under section 15301. This section exempts projects that consist of operation, repair, maintenance, or minor alterations of existing structures, facilities,

or topographical features, involving negligible expansion of existing or former use of the site. Examples of such projects include management of existing landscaping or native growth around buildings and other structures. Section 15301(h).

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