

COASTAL CONSERVANCY

Staff Recommendation

September 22, 2022

Pueblo Watershed Wildfire Resilience Program

[22-038-01]

Project Manager: Lilly Allen

RECOMMENDED ACTION: Authorization to disburse up to \$750,000 to San Diego Canyonlands for fire fuel reduction, including removal of brush, dead trees, and invasive vegetation, in the brush management zones of seven canyons within the underserved communities along the Chollas Creek corridor in Southeast San Diego and the neighborhood of City Heights in the city of San Diego, and adoption of findings under the California Environmental Quality Act.

LOCATION: City of San Diego, San Diego County

EXHIBITS

Exhibit 1: [Project Location Map](#)

Exhibit 2: [Photo Gallery](#)

Exhibit 3: [Support Letters](#)

Exhibit 4: [CEQA Documents](#)

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 seven hundred fifty thousand dollars (\$750,000) to San Diego Canyonlands (“the grantee”) to conduct fire fuel reduction activities, including removal of brush, dead trees, and invasive, non-native vegetation, within the brush management zones of seven canyons in the communities of City Heights and Southeast San Diego.

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:

1. A detailed work program, schedule, and budget.
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2. A plan for acknowledgement of Conservancy funding.
3. Evidence that all permits and approvals required to implement the project have been obtained.
4. Evidence that the grantee has entered into a written agreement with the City of San Diego sufficient to enable the grantee to carry out and maintain the project.

Findings:

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

1. The proposed authorization is consistent with Section 31113 of Chapter 3 of Division 21 of the Public Resources Code regarding the Climate Ready Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy has independently reviewed and considered the two Environmental Impact Reports listed below that were certified by the City of San Diego pursuant to the California Environmental Quality Act ("CEQA") and that are attached to the accompanying staff recommendation as Exhibit 4. The Conservancy finds that the proposed project as designed and mitigated avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.

The two applicable CEQA documents are:

- a. Final Environmental Impact Report (FEIR) for the Issuance of Take Authorizations for Threatened and Endangered Species due to Urban Growth in the Multiple Species Conservation Program (MSCP) Planning Area (Project No. 93-0287/SCH No. 1993121073), Certified January 1997.
 - b. Final Subsequent EIR/Environmental Assessment (EA) for the Brush Management Revisions to the Land Development Code and Federal Grant from the Office of Emergency Services (OES), Federal Emergency Management Agency (FEMA) (Project No. 31245/SCH No. 2004031041). Certified May 2004.
4. The grantee is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a \$750,000 grant to San Diego Canyonlands (SDCL) to conduct fire fuel reduction activities in the brush management zones of seven canyons in the City Heights and Southeast San Diego communities of the city of San Diego (the

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project). The project will take place on property owned by the City of San Diego (Exhibit 1). The fire fuel reduction activities include removal of brush; removal of small dead, dying, and diseased trees; and removal of invasive, non-native vegetation. The seven canyons are on City-owned land and are protected open space. The brush management zone (BMZ) is the area that extends 100 feet out from a habitable structure towards an area of vegetated open space (such as a canyon). The BMZ is intended to establish a firebreak to protect properties from fire risk while maintaining habitat values of the nearby open space area.

The project area BMZ is within five canyons (Chollas Creek, Hollywood Canyon, Manzanita Canyon, Olivia Canyon, Swan Canyon) in the City Heights neighborhood and two canyons (Emerald Hills, Radio Canyon) in the Southeast San Diego community, comprising 23.64 acres and 23,956 linear feet. The seven canyons are protected by the City as open space and some of these canyons are protected under the regional Multiple Species Conservation Program (MSCP) and are home to endangered animals such as the California Gnatcatcher, as well as rare plant species. These canyons provide open space and parkland for the surrounding communities. These canyons are under constant threat by invasive species and the subsequent fire risk they present by producing dry, dead brush each year.

The communities of City Heights and Southeast San Diego are among the most diverse communities in the nation and densely urbanized but lack adequate parks. With limited access to parkland within the community, it is vital that the canyons within these communities are protected from wildfire risks. It is also important to protect the people and residents in these communities from fire risk. Additionally, the low-income status of the communities surrounding the canyons raises the importance of the proposed project as the natural resources in these communities are often overlooked and under-resourced. The City of San Diego has a long history of underinvesting in parks and open spaces located in low-income and black, indigenous, and people of color (BIPOC) neighborhoods and this project presents an opportunity to bring much needed resources to these communities to increase safety and enhance local nature areas.

SDCL uses techniques that have been developed by professional ecologists to take advantage of naturally occurring conditions while maintaining habitat value and making spaces fire safe. Through utilization of specialized habitat-friendly techniques approved by City BMZ managers, high habitat value older growth will be retained and younger shrubs that can stump-sprout will be coppiced. When possible, native brush will be chipped and laid down as mulch to suppress the reoccurrence of invasives. Following nesting bird surveys, battery-powered, low-noise, low-emissions tools and hand-tools will be used in conjunction with noise monitoring equipment during nesting season to prevent nest disturbance. Invasive species will be removed to achieve 50% native cover.

This project will lead to long term resilience in the seven canyons by preventing reintroduction of invasive species from the private properties in the urban/wildland interface, and allowing SDCL to remove targeted species at the canyon rim before they enter the canyon ecosystem and increase fire risk. This work is important for preventing the introduction of invasive species into the seven canyons. Properly conducted, habitat-friendly techniques will encourage natives

over invasives, and the project includes continued invasive control work for at least 12 years (as well as the thinning and spacing of natives to prevent fire ladders and create effective fire breaks), depleting invasive seed banks, and preventing the setting of new invasive seed.

Consistent with the BMZ standards, in barren conditions prone to erosion, the project includes seeding and plantings with native plants to reach the 50% native cover goal. Additionally, the project includes removal of high fire risk invasive species in nearby canyon streambeds and along the trails that intersect with BMZ areas, such as Giant reed (*Arundo donax*) and Pampas grass (*Cortaderia spp.*), to reduce overall fire risk.

The project includes widespread outreach to property owners adjacent to work areas and their neighbors, providing education on invasives vs. natives, and encouraging responsible land management practices, as well as fire risk reduction practices consistent with City of San Diego's BMZ standards. SDCL will encourage private property owners to reduce invasive presence in their yards, and SDCL will activate local volunteerism to help prevent invasive introduction into the canyons.

Site Description:

The project area comprises the BMZ areas of five canyons in San Diego's City Heights neighborhood (Chollas Creek, Hollywood Canyon, Manzanita Canyon, Olivia Canyon, Swan Canyon) and two canyons in Southeast San Diego (Radio Canyon, Emerald Hills) (Exhibits 1 and 2). Total acreage of the project area is 23.64 acres and 23,956 linear feet. Vegetation in the canyons and open spaces is dominated by black mustard, and support populations of endangered plants and animals, including the California gnatcatcher.

The seven canyons are within the Pueblo watershed, which is within the San Diego Bay Watershed Management Area. Nearly all the of the canyon environments within the Pueblo watershed are bounded by private properties at the canyon rim. The City of San Diego defines Brush Management Zones (BMZ) as 100' out from a habitable structure towards undeveloped wildlands. The project site will mostly be the BMZ areas closest to the canyons (zone 2 of the BMZ). Flammable, invasive brush near homeowners creates significant fire risk for these neighborhoods. Vandalism and the impacts of the homelessness crisis in San Diego also contribute to fire risks in these nature spaces.

Grant Applicant Qualifications:

Since 2009, SDCL has worked to enhance public access and improve habitat health in the canyons located in the city of San Diego. SDCL has a history of successful habitat restoration work in the canyons and holds a Master Right of Entry (ROE) that provides access to these spaces for habitat restoration and canyon enhancement through a close working relationship with City officials. SDCL staff have over seven years of experience administering government grants. SDCL has successfully worked with the Conservancy in the past and has the internal financial infrastructure in place to streamline grant reporting and invoicing. In the last 5 years

SDCL has carried out two large habitat restoration projects funded by government grants, each grant having about \$300,000 in contractor expenses that needed to be paid and then reimbursed.

SDCL will anchor this project in the lessons learned from the implementation of a very similar fire fuels reduction project in the San Diego River watershed. This similar project is also being carried out on City-owned land and has gained all the necessary permissions to conduct fire fuels reduction. SDCL has a specific written agreement with the landowner, City of San Diego, to conduct this project.

SDCL has trained in-house teams largely recruited from local neighborhoods near work areas. Half of the 20-person field crew which would be implementing this project are residents of the local City Heights community where much of the work will be conducted.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on September 23, 2021, in the following respects:

Selection Criteria

1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.

See the "Consistency with Conservancy's Strategic Plan" section below.

2. Project is a good investment of state resources.

The proposed project is a good investment of state funding. This project is feasible and the budget is reasonable based on SDCL's recent experience planning and implementing a similar project in the San Diego River watershed. Large portion of the budget will go towards staff time for SDCL Field Technicians whose base pay is matched to the City of San Diego Living Wage rate, updated annually to reflect the cost of living. The project addresses a demonstrated need for wildfire risk reduction in San Diego. The proposed project is consistent with several state plans, and specifically with the following:

- **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.
- **Safeguarding California Plan: 2018 Update** (California Natural Resources Agency, 2018): The project would help meet Objective F-18 of the Plan: "Expand grants and cost share agreements to Tribes, public agencies, nonprofit organizations, and landowners for selectively removing hazardous wildlife fuels."
- 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

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recommendations to agencies to increase the scale and pace of management and mitigation actions to improve forest health and resiliency.

This project was developed by combining SDCL's longstanding history in the Pueblo watershed canyons with more recent experience conducting similar fire fuels reduction work in the San Diego River watershed. The Pueblo watershed does not have a local funding agency, unlike many of the other local watersheds, and this is a timely opportunity to bring needed funding to these canyons and creeks. Costs for the project were determined based on experience from our similar project in the San Diego River watershed and from our staff's years of experience conducting field work in these Pueblo watershed canyons.

The project will provide important benefits to the many Californians that live near these nature spaces and to the local ecosystem.

3. Project includes serious effort to engage tribes. Examples of tribal engagement include good faith, documented efforts to work with tribes traditionally and culturally affiliated to the project area.

SDCL currently has a partnership grant with the recently launched Native American Conservation Corps, funded by a mutual partner the San Diego River Conservancy, and they plan to collaborate to share best practices as both crews continue to grow and do similar field work. SDCL is working to craft new connections with specific tribal groups and organizations that service them. They are working to build relationships of trust, necessary prior to creating more formal associations. This is a target development focus for Canyonlands, and they expect this to be further developed soon.

4. Project benefits will be sustainable or resilient over the project lifespan.

For the term of the grant, project success with fire fuel reduction and improved fire safety will be ensured by SDCL crews annually maintaining each canyon and creek area. Additionally, volunteer support will also be leveraged to maintain work areas to City of San Diego BMZ standards. The habitat-friendly techniques applied should have lasting impact, helping to maintain less fire-prone native plant populations over invasive species introduction, and will retain existing native habitat for the benefit of local fauna. This project also leverages in-kind volunteer support from weekly Saturday volunteer events and in-kind monetary support from secured grants to support work in these canyons.

5. Project delivers multiple benefits and significant positive impact.

This project is designed to provide multiple benefits, creating significant positive impacts for both people and open space in the City Heights and Southeast San Diego communities. One key aspect of this program is the people who will be conducting the work: over half of SDCL's 20-person field crew is made up of residents of the City Heights neighborhood. The project thus provides employment and land management training for local residents of an underserved

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community, incorporating a meaningful anti-displacement strategy. The project also benefits the health of these natural areas. In addition to reducing immediate wildfire risk, the project will make the canyons and creeks more resilient through implementation of long-lasting strategies to replace invasives species with natives rather than simply cutting down invasive species year-after-year.

The project will remove shallow-rooted non-native vegetation, allowing deeply rooted native vegetation to become reestablished in the canyons, thereby decreasing erosion and increasing stormwater infiltration. Deep roots help the earth absorb water and thus slow the runoff to downstream areas. Pollutant particles in urban runoff, attach to sediment and are carried to the coastal waters. Thus, the project will help stabilize streambeds and result in less erosion, sediment, and pollution delivered by stormwater to San Diego’s estuaries and the coast.

6. Project planned with meaningful community engagement and broad community support.

SDCL hosts weekly volunteer events each Saturday in the four City Heights canyons and in the Chollas Creek community. Many of these events are run in partnership with local volunteer Friends Groups, some of which have been working in their local Open Space for over a decade. Much of the work these volunteers do is to remove invasive species and we would continue to engage their participation and input throughout the length of the project and beyond. SDCL will also continue to work with City of San Diego, Parks and Recreation Department, Open Space Division planning staff and Rangers who manage the land, grant work permissions, and support habitat restoration efforts when possible.

SDCL, along with the Resource Conservation District of Greater San Diego County, the local Red Cross chapter and other local interests, has been working to launch a fire safe council for the City Heights and Southeast San Diego communities. The goal of the council will be to help with long term brush management issues and other fire resiliency tasks. Establishing this fire safe council will further help us connect with the community and gather input.

PROJECT FINANCING

Coastal Conservancy	\$750,000
Other Funding	\$426,1000
Project Total	\$1,176,100

The anticipated source of funding is the Fiscal Year 2021-22 appropriation from the General Fund to the Conservancy for the purpose of wildfire risk reduction. (The Budget Act of 2021, AB 128, as amended by SB 170.) The proposed project is consistent with the anticipated funding source.

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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, including those that reduce greenhouse gas emissions, and address extreme weather events, sea level rise, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources.

Consistent with these sections, the proposed project will restore the health and resilience of California natural lands and reduce fire risk to communities. The project will help California's natural lands to be more resilient to catastrophic wildfires which may ultimately reduce greenhouse gas emissions released from increased wildfires due to climate change.

The proposed project addresses resources within the Conservancy's jurisdiction by improving natural lands 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 a project to restore the health and resilience of California forests, grasslands, and natural lands in a manner that reduces fire risk to communities. The project will help California's natural lands to be more resilient to catastrophic wildfires.

Consistent with **Goal 16, Objective A**, which seeks to prioritize projects for funding that are in disadvantaged communities or directly benefit disadvantaged communities, the proposed project is primarily located in a disadvantaged community.

CEQA COMPLIANCE:

The City of San Diego, as the lead CEQA agency, has issued a Master Right of Entry Permit to San Diego Canyonlands (SDCL) and has determined that the project activities are addressed in two environmental impact reports. Staff has independently evaluated the two applicable CEQA documents:

- a. The Final Environmental Impact Report (FEIR) for the Issuance of Take Authorizations for Threatened and Endangered Species Due to Urban Growth

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Within the Multiple Species Conservation Program Planning Area and associated Mitigation Monitoring and Reporting Program (MMRP) certified by the City of San Diego in January 1997.

- b. Final Subsequent EIR/Environmental Assessment (EA) for the Brush Management Revisions to the Land Development Code and Federal Grant from the Office of Emergency Services (OES), Federal Emergency Management Agency (FEMA) (Project No. 31245/SCH No. 2004031041). Certified May 2004.

The Project's vegetation treatment activities are analyzed in the MSCP FEIR as part of a discussion of preserve management that includes fire management. The FEIR identifies potential significant adverse impacts to sensitive plant and animal species and sensitive vegetation communities and habitats (Impacts 4.3 MHPA-3, 4, and 5; Pages 5-6 of the FEIR MMRP). The FEIR finds that these impacts are mitigated to a less than significant level by implementation of the subarea plan. For the City of San Diego subarea plan, mitigation measures include (Vol2 page 569 of 602), 4.3-MHPA-15, 4.3-MHPA-16:

- Preservation of core or major populations of covered species occurring within the City of San Diego.
- Design and configuration of the portion of the Multi-Habitat Planning Area (MHPA) preserve within the City of San Diego.
- Monitoring and reporting measures included in the Biological Monitoring Plan for Multiple Species Conservation Program included in MSCP Plan.
- Preservation of core habitat areas occurring within the City of San Diego (Attachment 3 to MMRP).
- Observance of ordinances identified in the City of San Diego Subarea Plan and the City's RPO.

Consistent with the City's MSCP Subarea Plan the project will carry out fire fuel reduction activities such as; removal of small dead, dying, and diseased trees; and the removal of invasive, non-native vegetation within the urban/wildland interface in the brush management zone (BMZ) within City-owned Open Space. In the City of San Diego, SDCL only works within protected Open Space. Chollas Creek, Manzanita Canyon, Emerald Hills, Radio Canyon projects are entirely within MHPA embedded, while the Olivia Canyon, Swan Canyon, and Hollywood Canyon projects are only within Open Space. The Subarea Plan allows for brush management in the Central City Preserve Management Area extending into the preserves up to 100 feet from structures if severe fire hazards exist and requires that brush management be planned under the direction of the Fire Marshal. Implementation of these brush management guidelines will reduce the potential impacts to sensitive plants, animals, and vegetation communities to a less than significant level. Habitat-friendly techniques approved by City BMZ managers include:

- High habitat value older growth will be retained and younger shrubs that can stump-sprout will be coppiced.

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- When possible native brush will be chipped and laid down as mulch to suppress the reoccurrence of invasives.
- Following nesting bird surveys completed by certified inhouse technicians, battery-powered (low-noise) tools and hand-tools will be used in conjunction with noise monitoring equipment during nesting season to prevent nest disturbance.

The project activities are also consistent with the Final Subsequent EIR/Environmental Assessment (EA) for the Brush Management Revisions to the Land Development Code and Federal Grant from the Office of Emergency Services (OES), Federal Emergency Management Agency (FEMA) (Project No. 31245/SCH No. 2004031041). The grantee will perform all brush management activities in accordance with the City's Brush Management Regulations. Thus, implementation of the Project is not anticipated to result in new or more severe significant impacts over and above those disclosed in the previously certified Subsequent EIR/EA. The grantee is currently allowed to perform habitat project maintenance and non-native plant removal in the permitted area. Therefore, the proposed brush management and invasive species removal activities would be consistent with the permitted activities of the Master ROE Permit. As stated above, the grantee would be required to present each project to the City's Parks & Recreation Department for review and approval prior to commencing work. Thus, the Project is a subsequent discretionary action and is not considered a separate project for the purposes of CEQA review pursuant to CEQA Guidelines Sections 15378(c) and 15060(c)(3).

All work proposed for this project is CEQA compliant and will fall under SDCL's Master ROE and existing City-held permits for BMZ, Open Space trail management, and maintenance of the Multi-Habitat Planning Area (MHPA)—the City's jurisdiction within the MSCP. See the letter from the City of San Diego included with this application (Exhibit 4). The scope of work for the Master ROE Permit includes:

- Canyon Habitat Restoration/Enhancement. Restore and enhance disturbed canyon habitat.
 - Non-Native Plant Removal
 - Herbicide Application
 - Tree Removal of non-native trees less than 3" DBH. Removal of live, non-native trees greater than three inches (3") in diameter is prohibited unless a plan is approved in writing, in advance by the managing department City staff.
 - Native Plant Planting
 - Seed Collection for use in restoration/enhancement activities on City owned land.
 - Upland and Wetland Restoration
 - Habitat Project Maintenance
 - Erosion Control BMPs
 - Spreading mulch or wood chips

The Project will follow City standards laid out in the Master ROE Permit.

Mitigation Measures for Non-Native Plant Removal:

- When using volunteers, selectively remove non-native plants within the Permit Area using a variety of non-powered hand tools including gloves, shovels, hoes, manual weed whacker, hand snips, loppers, sheers, rakes, and saws.
- Power tools, including chippers, weed whips, chain saws and/or other hand-held power tools, will only be used by qualified PERMITTEE staff and will occur outside of bird nesting season unless otherwise approved by the CITY' s Park and Recreation Department Open Space Division (Open Space Division) and with appropriate surveys, distance and use-interval protocols.

Vehicles:

Vehicles no larger than a pickup truck may be used to deliver equipment, plants, materials and water to the Project sites. Trucks will use only existing utility access roads and turnouts. Plans to use a vehicle in the Permit Area shall be included in the Project Description for each Project and approved by the CITY Contact and CITY Authority.

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