

Supplemental Environmental Assessment

# Vegetation Management

City of San Diego

FEMA-1577-DR-CA, FEMA-1585-DR-CA

HMGP #1577-6-2, 1577-8-3, 1585-9-1

*December 2007*



**FEMA**

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**Supplemental Environmental Assessment to the Programmatic Environmental Assessment (PEA) for Typical Recurring Actions Resulting From Flood, Earthquake, Fire, Rain, and Wind Disasters in California as Proposed by the Federal Emergency Management Agency**

City of San Diego

San Diego Vegetation Management Project

HMGP 1577-6-2, 1577-8-3, and 1585-9-1

December 2007

## 1. INTRODUCTION

The City of San Diego (City) has applied for funds from the Federal Emergency Management Agency (FEMA), through the State of California Governor's Office of Emergency Services, to conduct vegetation management on City-owned lands within San Diego, San Diego County, California. FEMA is proposing to fund the project through the Hazard Mitigation Grant Program (HMGP) under presidential disaster declarations (FEMA-1577-DR-CA and FEMA-1585-DR-CA) for the severe storms that occurred in Southern California between December 2004 and February 2005.

### 1.1 SCOPE OF DOCUMENT

FEMA has prepared the *Final Programmatic Environmental Assessment (PEA) for Typical Recurring Actions Resulting from Flood, Earthquake, Fire, Rain, and Wind Disasters in California* (FEMA 2003), which assesses common impacts of the action alternatives that are under consideration at the proposed project site. The PEA adequately assesses impacts from the action alternatives for some resource areas, but for the specific actions of this particular project, some resources are not fully assessed in the PEA. Therefore, for this specific project to comply with the National Environmental Policy Act, this Supplemental Environmental Assessment (SEA) has been prepared to tier from the PEA and fully assess the additional impacts to resources that are not adequately addressed in the PEA. This SEA hereby incorporates the PEA by reference, in accordance with Title 40 Code of Federal Regulations (CFR) Part 1508.28.

### 1.2 PURPOSE OF AND NEED FOR ACTION

The objective of FEMA's HMGP is to reduce the loss of life and property due to natural disasters and to enable long-term hazard mitigation measures to be implemented during the immediate recovery from a disaster. Through this program, FEMA provides grants to state and local governments to implement long-term hazard mitigation measures after a major disaster declaration. Therefore, the purpose of the proposed action is to provide HMGP funding to the City to reduce the risk of wildfires on City property.

The City owns several open-space areas that include steep canyon slopes and canyon rims, containing both native and nonnative vegetation. Figure 1 (Appendix A) shows the location

of many of these open-space areas. Many of these areas are densely vegetated and have high fuel loads. The combination of dense vegetation and steep slopes has resulted in a high fire hazard within and adjacent to these areas.

On the mesas adjacent to many of these canyons, homes and residential communities have been developed, resulting in a wildland-urban interface within the undeveloped, densely vegetated canyons. The combination of the high fire hazard within the vegetated canyons with the proximity of adjacent homes along the canyon rims has resulted in a high vulnerability of these homes to wildland fires that originate or travel in the canyons. Vegetation management can reduce the risk and severity of wildfire by reducing the fire's fuel load. Therefore, action is needed to reduce wildfire hazards and help protect residents and private property adjacent to open space areas of the City.

## **2. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES**

### **2.1 NO ACTION ALTERNATIVE**

The existing fire hazard would remain under the No Action Alternative as described in Section 2.1 of the PEA. Wildland fires would continue to threaten public health and safety, public property, and open-space areas. The City would continue to be vulnerable to economic losses from fire damage.

### **2.2 PROPOSED ACTION**

The proposed action falls under the Vegetation Management action alternative defined in Section 2.5.1 of the PEA. The proposed action would consist of the activities described below.

Under the proposed action, the City would create a wildfire buffer (or treatment area) in open-space lands adjacent to private property. This buffer would occur on approximately 687 acres of City-owned and -managed open-space areas, which would encompass approximately 89 noncontinuous linear miles (Figure 1 in Appendix A). This treatment area would occur adjacent to approximately 6,480 homes. The treatment areas would be established in compliance with the City's Land Development Code. Treatment activities would involve selectively thinning, trimming, and pruning vegetation using handheld tools. Figures A-1 through A-10 (Appendix A) show details of the treatment areas.

Treatment would occur in linear segments adjacent to several communities within the City. Table 1 lists the ten communities within the City's brush management action area. Generally, the action area would be approximately 65 feet wide, starting from approximately 35 feet away from private structures and extending to a maximum of 100 feet away from these structures. This action area is defined as Brush Management Zone 2 in the City Land Development Code. The initial 35-foot area between private structures and the edge of the action area is defined in the City Land Development Code as Brush Management Zone 1. Brush Management Zone 1 occurs on private property and represents the minimum setback,

per the City Land Development Code, between private structures and property lines. Property owners are required under the City Land Development Code to maintain a density of vegetation in Brush Management Zone 1 of no more than 10 percent native, nonirrigated vegetation and to prune trees away from structures and chimneys. Activities in Brush Management Zone 1 would not be part of the proposed action.

**Table 1 Communities within the San Diego Vegetation Management Treatment Area**

Carmel Valley
Black Mountain
Los Penasquitos
Scripps Ranch
Marion Bear Park
Tecolote Canyon
Serra Mesa
Tierra Santa
Lake Murray & Del Cerro
Bay Terrace & Encanto

Source: City of San Diego Planning Department 2003

The proposed action area is located along the edge of steep hillsides. Vegetation in the area consists of both native and nonnative plant species. The proposed action would consist of selectively thinning, trimming, and pruning approximately 50 percent of native vegetation within Brush Management Zone 2. Nonnative vegetation would be cut at 6 inches above the ground. No excavation, removal, or disturbance of existing plant root systems would occur. All vegetation would be treated using handheld tools such as machetes, weed-whackers, and, when necessary, chainsaws.

Treatment activities would be completed based on areas prioritized by the City as high-risk areas. In addition, treatment activities would be sequenced based on the California coastal gnatcatcher breeding season. Areas containing suitable gnatcatcher habitat would be avoided between March 1 and August 15. The proposed action would occur over a 3-year timeframe.

Staging areas would occur along paved roadways and are shown on Figures A-1 through A-10 in Appendix A. All pruned vegetation would be bagged and hand carried off the site to staging areas. Pruned materials would be delivered to Miramar Landfill for mulch recycling in 2.5-ton dump trucks. Depending on the materials collected at each particular site, the trips to remove material would occur once or twice per day.

Work crews would consist of six to eight people, and up to three crews would be working at any one time. Work would occur in the area from 8:00 am, ending no later than 5:00 pm.

Notices of planned activities would be posted in the area. It is estimated that each work crew would thin and remove materials from approximately 0.25 acre per day.

Following the completion of the proposed action, vegetation density in the treatment areas would be maintained by the City. The City would implement a rotational vegetation treatment program that would reduce vegetation densities every 14 years. This treatment program would ensure that invasive species would not proliferate in the areas treated under the proposed action. These maintenance activities are not proposed to be funded by FEMA.

## **2.3 OTHER ACTION ALTERNATIVES**

Other alternatives to the proposed action are adequately addressed in Section 2 of the PEA.

## **3. AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES**

The PEA has adequately described the affected environment and the impacts of the proposed action for many resource areas, except for geology and soils; air quality; biological resources; cultural resources; public services and recreation; and visual resources. Therefore, the affected environment and environmental consequences for those resources are described in this section, which is intended to supplement the information contained in the PEA.

Necessary avoidance and minimization measures, either stipulated in the PEA, or based on the results of the impact analysis in the SEA, that are appropriate for the proposed action, are discussed in Section 4. The No Action Alternative is adequately described in the PEA for all resource areas.

### **3.1 GEOLOGY AND SOILS**

The proposed action would not result in soil-disturbing activities. No mechanized equipment would be used. No ground cover would be removed. All vegetation removal would be above ground. Root structures would remain intact for the purpose of erosion control. Grasses would be cut within 2 inches of grade up to 2 inches. The vegetation removal, as proposed, would prevent the potential for erosion and sedimentation activities to occur. Soil loss would not occur directly from disturbance or indirectly via wind or water. Because ground-disturbing activities would not occur, no potential would exist for landslides to occur as a result of the proposed action. To further reduce the potential of effects to geology and soils, the City would implement the minimization measures described in Section 4.1 of this SEA. Implementation of the proposed action and these minimization measures would result in no adverse impacts to geology and soils.

### **3.2 AIR QUALITY**

The project site is located in the San Diego Air Basin, which is regulated by the San Diego Air Pollution Control District. San Diego County meets the federal attainment standards for all criteria pollutants except for the 8-hour ozone standard. The General Conformity Rule requires that a determination be made of the proposed action's conformity with the State

Implementation Plan. The emission thresholds for General Conformity Rule Applicability [40 CFR Part 51.583(b)] are 100 tons per year for ozone precursors (volatile organic compounds [VOCs], nitrogen oxide [NO<sub>x</sub>], particulate matter less than 10 microns in diameter [PM<sub>10</sub>], and carbon monoxide [CO]) and 100 tons per year for all pollutants for which the area is in attainment of federal attainment standards.

Implementation of the proposed action would result in a temporary deterioration of air quality. The project-related effects to air quality would include short-term increases of fugitive dust and equipment combustion emissions that would be created by motorized hand tools. Emission estimates for VOCs, NO<sub>x</sub>, PM<sub>10</sub>, and CO fall below the threshold levels of the General Conformity Rule. Assuming project implementation occurring every day of a 365-day year and 3 crews with 8 members (most-conservative scenario), the proposed action would result in the emissions summarized in Table 2.

**Table 2. Estimated Emissions During Construction per Year**

	VOCs	CO	NO <sub>x</sub>	PM <sub>10</sub>
Emissions (tons/year)	0.33	2.17	3.25	0.25

Table 2 shows that implementation of the proposed action would result in less than 100 tons per year of the applicable regulated pollutants. Therefore, the proposed action qualifies as a General Conformity Rule exemption, and no further analysis is required to establish conformity with the State Implementation Plan.

### 3.3 BIOLOGICAL RESOURCES

To comply with Section 7 of the federal Endangered Species Act (ESA), FEMA conducted an analysis of the effects of the proposed action on federally listed species, which is described in a Biological Assessment (URS 2007a), and consulted with the U.S. Fish and Wildlife Service (USFWS). On December 6, 2007, USFWS concurred with FEMA's determinations and concluded the interagency coordination process described under Section 7 of the ESA. A summary of the Biological Assessment and the consultation process between FEMA and USFWS is described below.

A reconnaissance survey was conducted and habitat of the action area was mapped on September 15, 2006, and May 23 through May 25, 2007. Ten vegetation communities were identified in the action area and four of them have disturbed vegetation: eucalyptus woodland, chaparral, Diegan coastal sage scrub, ornamental, disturbed habitat, chamise chaparral, coastal sage scrub-chaparral mix, scrub oak chaparral, southern riparian scrub, and maritime succulent scrub (Holland 1986). No aquatic habitats were identified in the action area or its immediate vicinity. Table 3 presents a summary of the total acreages for the terrestrial vegetation types found in the action area.

**Table 3**  
**Total Acreages for the Vegetation Communities**  
**Identified in the Action Area**

Vegetation Community	Acres Within the Action Area
Eucalyptus Woodland	133.7
Chaparral	100.2
Diegan Coastal Sage Scrub	97.1
Ornamental	86.0
Disturbed Habitat	86.0
Disturbed Diegan Coastal Sage Scrub	62.4
Chamise Chaparral	33.1
Disturbed Chaparral	32.7
Coastal Sage Scrub-Chaparral Mix	21.9
Scrub Oak Chaparral	18.6
Disturbed Coastal Sage Scrub - Chaparral Mix	6.3
Southern Riparian Scrub	5.3
Disturbed Chamise Chaparral	3.7
Maritime Succulent Scrub	0.4
<b>TOTAL</b>	<b>687.4</b>

Information concerning species listed as threatened, endangered, or proposed to be listed as threatened or endangered, that may occur in the action area was requested from the USFWS Carlsbad Field Office for the five U.S. Geological Survey 7.5-minute quadrangles surrounding the action area: Point Loma, La Jolla, La Mesa, National City, and Imperial Beach. In addition, the California Department of Fish and Game's California Natural Diversity Database was searched for known occurrences of species listed or proposed to be listed within those five 7.5-minute quadrangles. A literature review was conducted to identify habitat requirements and distribution of these species. As a result of the field and background review, FEMA determined that the action area provides habitat suitable for one federally listed bird species under USFWS' jurisdiction. The coastal California gnatcatcher (*Polioptila californica californica*) is known to occur in the action area.

The City has a Multiple Species Habitat Conservation Program (MSCP) Subarea Plan in place, which was developed in conjunction with its brush management policies and regulations. The action area occurs within the MSCP Subarea Plan. The MSCP Subarea Plan was approved by the City in March 1997, and the USFWS issued a Biological and Conference Opinion on Issuance of an Incidental Take Permit to the City pursuant to the MSCP Subarea Plan on June 6, 1997. The MSCP Subarea Plan, in combination with the MSCP Subregional Plan for southwestern San Diego County, serves as a Multiple Species Habitat Conservation Plan pursuant to Section 10(a)(1)(B) of the federal ESA.

The MSCP Subarea Plan identifies a Multiple Habitat Planning Area (MHPA). The MHPA includes large blocks of native habitat having the ability to support a diversity of plant and animal life. FEMA determined that approximately 264.6 acres of the action area would be located within the MHPA and 422.8 acres would be located outside the MHPA.

The MSCP Subarea Plan contains policies related to fire management. By design, the proposed action would follow the current requirements for Brush Management Zone 2, as described in the MSCP Subarea Plan. Specifically, the City would implement conservation measures to avoid and/or minimize impacts on federally listed species and ensure consistency with its MSCP Subarea Plan, including the following:

- Treatment activities would not occur in occupied coastal California gnatcatcher habitat during the gnatcatcher-breeding season (March 1 through August 15).
- Treatment activities would not occur in narrow wildlife corridors.
- Treatment activities would not occur in wetlands habitat.
- Impact to narrow endemic and/or federally listed plants would be avoided and/or minimized consistent with the City's MSCP Subarea Plan. Qualified biologists would survey for narrow endemic and/or federally listed plants within the MHPA for major populations, and ensure that they would not be impacted by vegetation management activities.

On October 12, 2007, FEMA transmitted a Biological Assessment to USFWS, which determined that the proposed action was consistent with City's MSCP Subarea Plan, and requested concurrence with this consistency determination. Additionally, the USFWS received information from the City describing a City resolution adopted on September 6, 2005, City Council Resolution Number R-300799, that adds 715 acres to the City's MHPA to mitigate additional impacts caused by vegetation management beyond those originally permitted under the City's MSCP Subarea Plan, as determined in 1997. On December 6, 2007, USFWS determined that the proposed action was consistent with the City's MSCP Subarea Plan and extended to FEMA the take coverage currently permitted under the City's incidental take permit (Appendix B). This letter concluded FEMA's obligations under the ESA.

### 3.4 CULTURAL RESOURCES

Cultural resource investigations were undertaken to ensure that all archaeological sites had been identified within the proposed action's Area of Potential Effects (APE). The efforts to identify both previously recorded sites and previously undiscovered sites within the APE were undertaken in compliance with the 2005 First Amended Programmatic Agreement (PA) among FEMA, the State Historic Preservation Officer (SHPO), OES, and the Advisory Council on Historic Preservation.

Pursuant to the revised implementing regulations of the NHPA, found at 36 CFR Part 800.4(a)(4), FEMA's archaeological consultant contacted the California Native American Heritage Commission (NAHC) to request a review of its Sacred Lands Files and a list of the individuals or groups that NAHC believes should be contacted regarding information or

concerns related to the project areas. The NAHC responded with negative results for its search of the Sacred Lands File. FEMA transmitted an informational letter to potentially interested parties identified by the NAHC. To date, FEMA has received one response. On November 2, 2007, FEMA replied to the Native American party and forwarded a completed Cultural Resources Technical Report, which outlined all resources found during literature review and field surveys, measures to reduce impacts to resources, and the need for archaeological and/or Native American monitors at specific known archaeological site.

FEMA's archaeological consultant conducted a field survey of the APE in May 2007. The field survey consisted of an intensive pedestrian survey of the APE. Field surveys relocated 1 of 13 archaeological sites previously recorded as being within the APE and identified 3 previously unrecorded archaeological sites. The 12 sites that had been previously recorded as being within the project's APE were not relocated for the following reasons: dense vegetation concealing the site, or the site was destroyed by development and construction after the initial recordation.

On November 2, 2007, FEMA transmitted a letter to the SHPO describing FEMA's determination of "no historic properties affected," per the PA, for the proposed action and requested that the SHPO concur with FEMA's determination. FEMA also transmitted a Cultural Resources Technical Report (URS 2007b) in support of its determination. As a part of this determination, FEMA concluded that the previously recorded archaeological site, CA-SDI-5371, did not retain the qualities that would make the site eligible to list on the National Register of Historic Places. FEMA did not evaluate the three new sites that were identified during field surveys for listing in the National Register of Historic Places, but for the purposes of the proposed action, treated and considered them as eligible. FEMA stated that it would require the City to avoid the three newly identified archaeological sites (FEMA-SDI-001, -002, and -003) during the vegetation management activities by having orange "snow" fencing placed around the sites for protection and having a Secretary of the Interior-qualified archaeologist on hand during vegetation clearing in those areas. Additionally, FEMA would require that a Native American monitor be present during vegetation management activity in the immediate vicinity of the newly recorded site, FEMA-SDI-002. On December 4, 2007, SHPO responded to FEMA's November 2, 2007, letter (Appendix C), concurring with FEMA's compliance with the PA and FEMA's proposed measures to reduce effects to archaeological resources. The SHPO state that a "No Adverse Effect" determination was appropriate, and concluded FEMA's and SHPO's compliance process pursuant to the PA.

### 3.5 PUBLIC SERVICES AND RECREATION

Some of the work sites for the proposed action would be within open-space preserves that allow public recreational uses, such as hiking. The proposed action would include utilization of some of the public access points of the open-space preserves to access the work sites. These access points would also be used as staging areas. The public access points that would be near to or adjacent to work sites could be temporarily closed to the public while vegetation management activities would be taking place. In addition, all areas where work would occur would be temporarily closed to the public. The short-term impacts associated with the

proposed action would be less substantial than the short- and long-term impacts to public recreation in these open-space preserves as a result of a wildfire.

### **3.6 VISUAL RESOURCES**

The scenic qualities of the landscape within the action area mainly consist of a vegetated environment with grasses, shrubs, and landscaped trees. Because the proposed action would not remove all vegetation and only selectively thin, trim, and prune approximately 50 percent of native vegetation, the visual context and visual quality of the treatment areas would not change. No new viewsheds would be created and existing views of the action area would not be deteriorated. Short-term impacts to views within the action area would occur during vegetation clearing when crews are working within the action area. Through the City's long-term maintenance of the treatment areas, the visual resources of the action area would not change once the proposed action has been implemented.

### **3.7 CUMULATIVE IMPACTS**

No other related projects are planned in the project vicinity or in nearby areas. Therefore, no adverse cumulative impacts are expected to occur with implementation of the proposed action.

## **4. MINIMIZATION AND AVOIDANCE MEASURES**

The following minimization and avoidance measures have been extracted from PEA Section 4, or from measures developed for this SEA based on site-specific impacts, and are applicable for the proposed action.

### **4.1 GEOLOGY, GEOHAZARDS, AND SOILS**

The City would be responsible for implementing erosion protection measures including best management practices to minimize soil loss and sedimentation.

### **4.2 AIR QUALITY**

The City would be responsible for reducing potential air quality impacts from vegetation-clearing activities and employing minimization measures to limit fugitive dust and emissions. These measures include but are not limited to watering disturbed areas, scheduling the siting of staging areas to minimize fugitive dust, and keeping vehicles and chainsaws tuned properly.

### **4.3 BIOLOGICAL RESOURCES**

Through the project design and implementation of the City's MSCP Subarea Plan, impacts to biological resources would be minimized. Some of these measures within the project design

and MSCP Subarea Plan that would avoid or minimize impacts to biological resources include the following:

- Treatment activities would not occur in occupied coastal California gnatcatcher habitat during the gnatcatcher-breeding season (March 1 through August 15).
- Treatment activities would not occur in narrow wildlife corridors.
- Treatment activities would not occur in wetlands habitat.
- Impact to narrow endemic and/or federally listed plants would be avoided and/or minimized consistent with the City's MSCP Subarea Plan. Qualified biologists would survey for narrow endemic and/or federally listed plants within the MHPA for major populations, and ensure that they would not be impacted by vegetation management activities.

#### 4.4 CULTURAL RESOURCES

The City would be responsible for avoiding and minimizing impacts to the cultural resources identified within the APE. The City would be required to avoid the three newly identified archaeological sites (FEMA-SDI-001, -002, and -003) during the vegetation management activities by having orange "snow" fencing placed around the sites for protection and having a Secretary of the Interior-qualified archaeologist on hand during vegetation clearing in those areas. Additionally, a Native American monitor would be required to be present during vegetation management activity in the immediate vicinity of the newly recorded site, FEMA-SDI-002. In accordance with Stipulation X of the PA, the City would be required to stop work in the event of an unexpected discovery and comply with the steps outlined in Stipulation X.

#### 4.5 PUBLIC SERVICES AND RECREATION

The City would be responsible for notifying the public prior to implementation of the proposed action. Methods to notify the public might include posting of fliers at information centers and at public restroom facilities within the open space preserves.

#### 4.6 NOISE

The City would be responsible for ensuring that project activity would not be conducted between 7:00 pm and 7:00 am, on Sundays, or on federal holidays.

All noise-producing project equipment and vehicles using internal combustion engines would be equipped with properly operating mufflers and air inlet silencers, where appropriate, that meet or exceed original factory specification. This measure would assure that noise emissions from vehicles and other equipment are limited to the minimum feasible levels.

## 4.7 VISUAL RESOURCES

The City would implement best management practices that would include site and staging area cleanup following the completion of work activities at each particular work site and staging location.

## 5. REFERENCES

California Department of Fish and Game (CDFG). 2005. Rarefind 3, a program created by the California Department of Fish and Game, allowing access to the California Natural Diversity Database. April 2005 version.

City of San Diego (CSD). 2003. Global Information System (GIS) data layers provided by the City of San Diego Planning Department to URS Corporation on February 22 2007.

Federal Emergency Management Agency (FEMA). 2003. Programmatic Environmental Assessment (PEA) for Typical Recurring Actions Resulting from Flood, Earthquake, Fire, Rain, and Wind Disasters in California. US Department of Homeland Security, FEMA Region IX Environmental Offices, 1111 Broadway, Suite 1200, Oakland, CA 94607.

Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, The Resources Agency, Department of Fish and Game. October.

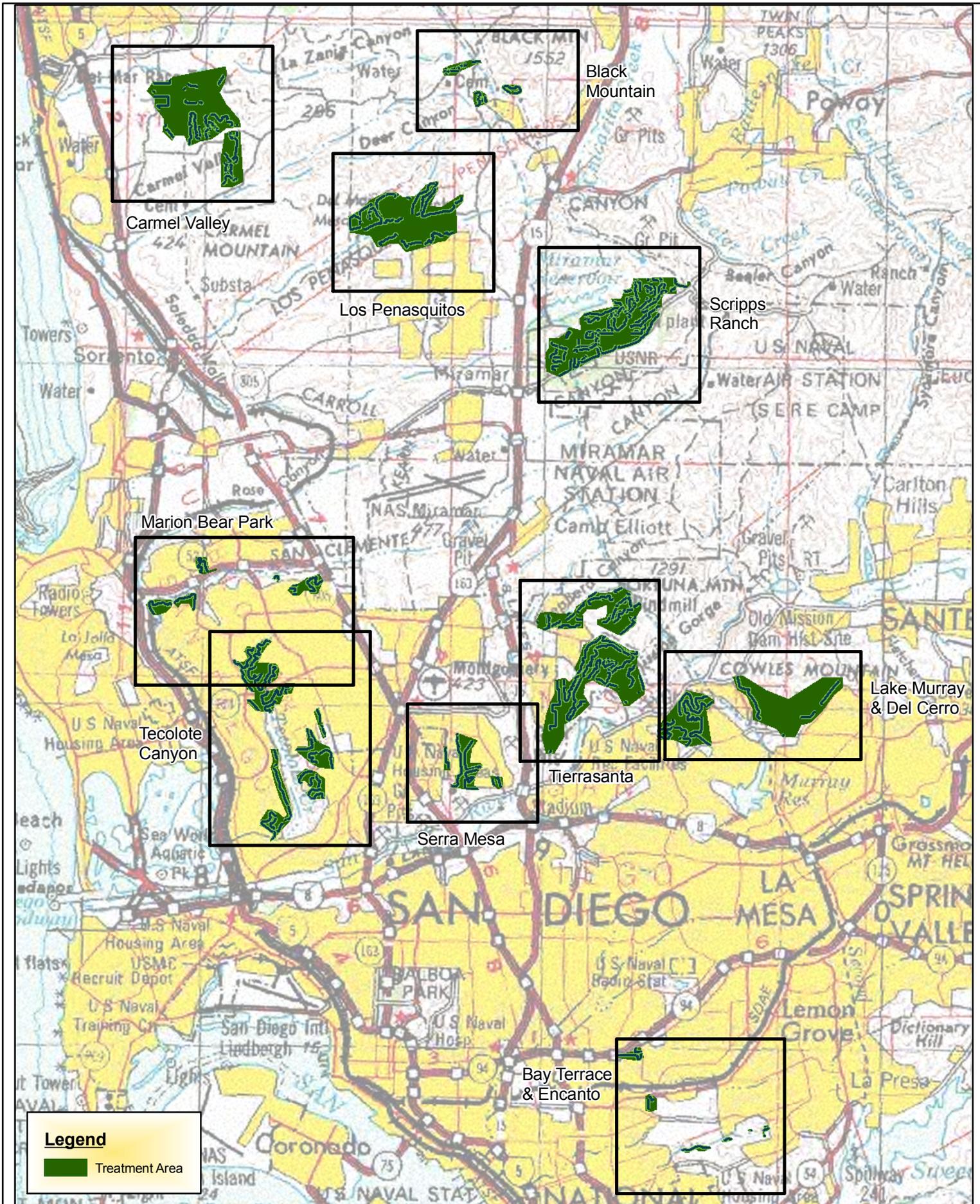
URS 2007a. Biological Assessment; Vegetation Management; City of San Diego; FEMA-1577-DR-CA, FEMA 1585-DR-CA; HMGP #1577-6-2, 1577-8-3, 1585-9-1. Prepared for FEMA. October 2007.

URS 2007b. Cultural Resources Technical Report; Vegetation Management; City of San Diego; FEMA-1577-DR-CA, FEMA 1585-DR-CA; HMGP #1577-6-2, 1577-8-3, 1585-9-1. Prepared for FEMA. October 2007.

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**Appendix A – Tables and Figures**

Figure 1	Project Vicinity
Figure A-1	Vegetation Communities Carmel Valley Area
Figure A-2	Vegetation Communities Black Mountain Area
Figure A-3	Vegetation Communities Los Penasquitos Area
Figure A-4	Vegetation Communities Scripps Ranch Area
Figure A-5	Vegetation Communities Marion Bear Park Area
Figure A-6	Vegetation Communities Tecolote Canyon Area
Figure A-7	Vegetation Communities Serra Mesa Area
Figure A-8	Vegetation Communities Tierrasanta Area
Figure A-9	Vegetation Communities Del Cerro & Lake Murray Areas
Figure A-10	Vegetation Communities Bay Terrace & Encanto Areas



City of San Diego  
Brush Management

15298765

Project Vicinity

Figure  
1

## Figure A-1

[Figures A-1 through A-10 provide blow-ups of each of the ten treatment areas. The figures are not provided in the web posting because the files are very large. Please contact Mr. Alessandro Amaglio, Federal Emergency Management Agency, U.S. Department of Homeland Security, 1111 Broadway, Suite 1200, Oakland, CA 94607-4052 (telephone: 510.627.7027) for copies of these figures.]

## Figure A-2

[Figures A-1 through A-10 provide blow-ups of each of the ten treatment areas. The figures are not provided in the web posting because the files are very large. Please contact Mr. Alessandro Amaglio, Federal Emergency Management Agency, U.S. Department of Homeland Security, 1111 Broadway, Suite 1200, Oakland, CA 94607-4052 (telephone: 510.627.7027) for copies of these figures.]

### Figure A-3

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#### Figure A-4

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Figure A-5 [Figures A-1 through A-10 provide blow-ups of each of the ten treatment areas. The figures are not provided in the web posting because the files are very large. Please contact Mr. Alessandro Amaglio, Federal Emergency Management Agency, U.S. Department of Homeland Security, 1111 Broadway, Suite 1200, Oakland, CA 94607-4052 (telephone: 510.627.7027) for copies of these figures.]

## Figure A-6

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## Figure A-7

[Figures A-1 through A-10 provide blow-ups of each of the ten treatment areas. The figures are not provided in the web posting because the files are very large. Please contact Mr. Alessandro Amaglio, Federal Emergency Management Agency, U.S. Department of Homeland Security, 1111 Broadway, Suite 1200, Oakland, CA 94607-4052 (telephone: 510.627.7027) for copies of these figures.]

## Figure A-8

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## Figure A-9

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## Figure A-10

[Figures A-1 through A-10 provide blow-ups of each of the ten treatment areas. The figures are not provided in the web posting because the files are very large. Please contact Mr. Alessandro Amaglio, Federal Emergency Management Agency, U.S. Department of Homeland Security, 1111 Broadway, Suite 1200, Oakland, CA 94607-4052 (telephone: 510.627.7027) for copies of these figures.]

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**Appendix B – USFWS Concurrence Letter**



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Ecological Services  
 Carlsbad Fish and Wildlife Office  
 6010 Hidden Valley Road  
 Carlsbad, California 92011



In Reply Refer To:  
 FWS-SD-2008B0171-2008I0167

DEC 06 2007

Mr. Alessandro Amaglio  
 Federal Emergency Management Agency  
 U.S. Department of Homeland Security  
 1111 Broadway, Suite 1200  
 Oakland, California 94607-4052

Subject: San Diego Vegetation Management Project, City of San Diego (FEMA-1577-DR-CA, HMGP 1577-6-2 and 1577-8-3, and FEMA-1585-DR-CA HMGP 1585-9-1)

Dear Mr. Amaglio,

This is in response to your October 12, 2007, letter, which we received on October 17, 2007, requesting a consistency determination for the above referenced project with the City of San Diego's (City) Multiple Species Conservation Program (MSCP), to fulfill the Federal Emergency Management Agency's (FEMA) requirements under section 7 of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). Our response is based on information provided in the following: (1) your letter dated October 12, 2007; (2) a Biological Assessment dated October 2007; (3) an electronic message from the City to the U.S. Fish and Wildlife Service dated December 4, 2007; and 4) telephone conversations with City staff.

FEMA is providing a grant to the City for vegetation management to create a wildfire buffer on approximately 687 acres in ten City-owned and managed open space areas. The proposed vegetation management will occur in 65-foot wide linear segments, starting from approximately 35 feet away from private structures and extending to a maximum of 100 feet away from these structures. Approximately 50 percent of native vegetation would be selectively thinned, and all non-native vegetation would be cut to within six inches of the ground, in the management areas.

Several federally listed species as given in the BA are known, or have the potential, to occur within the project area, all of which are covered in the City's MSCP. Consistent with the City's MSCP and subsequent revisions to vegetation management codes made by the City, the proposed project will implement conservation measures to avoid and/or minimize impacts to federally listed species and ensure consistency with the City's MSCP, including the following:

1. No vegetation management in occupied coastal California gnatcatcher (*Poliophtila californica californica*) habitat within the City's Multiple Habitat Planning Area (MHPA) will occur between March 1 and August 15.

TAKE PRIDE  
 IN AMERICA 

Mr. Alessandro Amaglio (FWS-SD-2008B0171-2008I0167)

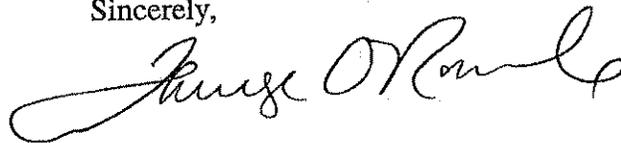
2

2. No vegetation management will occur in narrow wildlife corridors.
3. No vegetation management will occur in wetland habitat.
4. Per City Council Resolution Number R-300799 adopted September 6, 2005, 715 acres will be added to the City's MHPA to mitigate additional impacts caused by vegetation management beyond those originally permitted under the City's MSCP.
5. Impacts to narrow endemic and/or federally listed plants will be avoided and/or minimized consistent with the City's MSCP. Qualified biologists will survey for narrow endemic and/or federally listed plants within the MHPA or major populations [e.g., Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*) within Carmel Valley], and ensure that they are not impacted by vegetation management activities.

Therefore, we have determined that the project as proposed is consistent with the City's MSCP. Any impacts to or take of federally listed species by the vegetation management project will be authorized through the City's incidental take permit (No. PRT-830421). With the conservation measures listed above incorporated into the project, this consultation extends to FEMA the take coverage already allowed under the City's incidental take permit. FEMA's obligations under the Act for federally listed species have been met and formal consultation will not be necessary.

If you have any questions or concerns about this letter, please contact David Zoutendyk of my staff at (760) 431-9440.

Sincerely,



Therese O'Rourke  
Assistant Field Supervisor

cc: City of San Diego (Mayor Sanders, Carol Wood and Jeanne Krosh)  
California Department of Fish and Game (Libby Lucas)

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**Appendix C – SHPO Concurrence Letter**

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

P.O. BOX 942896  
SACRAMENTO, CA 94296-0001  
(916) 653-6624 Fax: (916) 653-9824  
calshpo@ohp.parks.ca.gov



04 December 2007

In reply refer to: FEMA071106A

Mr. Alessandro Amaglio  
Federal Emergency Management Administration  
US Department of Homeland Security  
1111 Broadway, Suite 1200  
Oakland, CA 94607-4052

Re: Section 106 Consultation for City of San Diego, California – San Diego Vegetation Management Project, FEMA-1577-DR-CA, HMGP 1577-6-2 and 1577-8-3, and FEMA-1585-DR-CA, HMGP 1585-9-1

Dear Mr. Amaglio:

Thank you for initiating consultation pursuant to the National Historic Preservation Act as amended and the implementing regulations codified at 36 CFR 800 and the Programmatic Agreement (PA) among FEMA, the State Historic Preservation Officer (SHPO), OES, and the Advisory Council on Historic Preservation (ACHP) with regards to the above undertaking. The project consists of selectively thinning, trimming, and pruning vegetation using handheld tools on approximately 154 acres in order to create a wildfire buffer in open space lands adjacent to private property. This 154-acre buffer would occur on approximately 680 acres of City-owned and managed open space areas, comprising approximately 89 non-continuous linear miles. All vehicles will remain on paved roads or developed areas adjacent to the treatment areas. Staging areas would also occur along paved roadways. All pruned vegetation would be bagged and hand carried off the site to staging areas.

FEMA has determined that the Area of Potential Effect (APE) lies within three large, high-fire risk communities referred to as the "Carmel Valley Group," the "Scripps Group," and the "Del Cerro Group" comprising approximately 680 acres. Because the treatment activities will be limited to handheld tools only, no vertical ground disturbance, and staging areas and vehicle access will be by paved roads or developed areas along the paved roads and treatment areas, I find the APE sufficiently defined pursuant to Stipulation VII.A. of the PA.

FEMA's efforts to identify historic resources consists of performing a cultural resources records review at the South Coastal Information Center (SCIC), contacting the Native American Heritage Commission (NAHC) for a review of their Sacred Lands File as well as obtaining a list of Native American groups and individuals to be contacted regarding the proposed undertaking, and the submittal of a *Cultural Resources Technical Report on Vegetation Management* prepared by URS, October 2007. I find this effort to identify historic resources and consultation with Native American groups and individuals sufficient pursuant to Stipulation VII.B. of the PA.

One previously known archaeological site (CA-SDI-5371) and three additional sites (FEMA-SDI-001, -002, -003) were identified within the APE. FEMA has documented that CA-SDI-5371 is not eligible for listing on the National Register of Historic Places (NRHP) due to the loss of vertical and horizontal integrity from previous bull-dozing, grading, and off-road vehicle activity. I concur with this determination.

For purposes of this undertaking only, the three newly identified archaeological sites (FEMA-SDI-001, -002, -003) will be considered eligible for listing on the NRHP. As a condition of the

grant for the revegetation project, FEMA will require that these three archaeological sites be avoided during implementation of the vegetation management activities, by having orange "snow" fencing placed around them for further protection, and having a Secretary of the Interior-qualified archaeologist monitoring during vegetation clearing in these areas. Additionally, FEMA will require that a Native American monitor will also be present during vegetation management activities in the immediate vicinity of FEMA-SDI-002. I concur with these efforts pursuant to Stipulation VII.C. of the PA.

In accordance with Stipulation VII of the PA, FEMA has conducted the Standard Project Review and made a determination of "no historic properties adversely affected" for this undertaking. I feel that a finding of No Adverse Effect would be more appropriate given the consideration of eligibility for the three newly identified sites (FEMA-SDI-001, -002, -003).

In the event of an unexpected discovery of archaeological resources during project activities, all work in the vicinity of the find(s) will stop and FEMA will comply with the steps outlined in Stipulation X of the PA.

Your consideration of historic properties in the project planning process is appreciated. If you have any questions or concerns, please contact Amanda Blosser of my staff, at (916) 653-9010 or [ablosser@parks.ca.gov](mailto:ablosser@parks.ca.gov).

Sincerely,



Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer

cc: Marcia Rentschler, OES  
Dennis Castrillo, OES  
Jane Arnold, City