

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE
DIRECTOR'S OFFICE
POST OFFICE BOX 944209
SACRAMENTO, CA 94244-2090



**CALIFORNIA ENVIRONMENTAL QUALITY ACT STATUTORY EXEMPTION FOR
RESTORATION PROJECTS
CONCURRENCE NO. 21080.56-2025-080-R5**

Project: Manzanita Greening and Canyon Health Project
Location: San Diego
Lead Agency: City of San Diego
Lead Agency Contact: Alisha Peña; AAPena@sandiego.gov

Background

Project Location: The Manzanita Greening and Canyon Health Project (Project) is located within the north-east portion of the Manzanita Canyon Open Space, in the City Heights community of the City of San Diego (City). The Project area is on City property and is approximately eight acres, within a City-right-of-way that runs parallel to Manzanita Drive. The Project site may be accessed in various locations, including via the vicinity of the junction of Thorn Street and 43rd Street. The approximate coordinates of the Project are 32.740006, -117.102550.

Project Description: San Diego Canyonlands (Proponent), in partnership with the City, proposes to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend. By restoring and enhancing native scrub oak chaparral, coastal sage scrub, and riparian habitats, the Project is expected to benefit California gnatcatcher (*Polioptila californica californica*), listed as threatened under the Endangered Species Act and Crotch's bumble bee (*Bombus crotchii*), a candidate for listing under the California Endangered Species Act, among other native species.

Streambed degradation, erosion, and invasive species proliferation within the Project area and the broader canyon, has been an ongoing problem that has caused channel widening, scour, and head-cutting (creek incision) resulting in the likelihood of streambank failure and damage to surrounding habitat. To address these issues, the Project is designed to restore and protect habitat along a one-mile reach of Manzanita Creek, totaling approximately eight acres in area, by improving existing erosion and drainage issues, removing invasive species, reducing existing public access impacts, and implementing streambed restoration. The components of the Project include:

- *Hydrologic Improvements:* Erosion and uncontrolled drainage in the Project area will be addressed through the stabilization of Manzanita Creek using bio-engineered features and vegetated fascines. These features will reduce flow velocities in the creek, increase

water infiltration and flow capacities, and stabilize creek banks, which may also incidentally benefit proximate infrastructure. Drainage issues will be addressed through the capture and conveyance of runoff at Thorn Street, further reducing downstream erosion.

- **Habitat Restoration:** Non-native and invasive plant species will be removed, such as broadleaf grasses, eucalyptus (*Eucalyptus spp.*), pepper trees (*Schinus spp.*), tamarisk (*Tamarix spp.*), ornamental palms (*Washingtonia spp.*, *Phoenix spp.*), pines (*Pinus spp.*), and ash (*Fraxinus spp.*). This will be followed by planting native vegetation, such as scrub oak chaparral and other species making up the coastal sage scrub plant community. Approximately 240 native trees will also be planted. Native trees will include coast live oak (*Quercus agrifolia*), California sycamore (*Platanus racemosa*), toyon (*Heteromeles arbutifolia*), and various willow (*Salix*) species. These native plants will assist in enhancing the site's fire resiliency and drought resistance, while also helping stabilize the creek and restoring a more resilient floodplain. Riparian planting will focus on creek banks and adjacent habitat, restoring a more natural invert with cobble and natural streambed stabilization features.
- **Streambed Stabilization:** To further reduce erosion, the Project will include efforts to decrease the average slope of the streambed, thereby reducing flow velocities and minimizing sediment uptake. Natural streambed stabilization features would be ensured through the installation of vegetated fascines, using mulefat (*Baccharis salicifolia*) and willow cuttings that are anchored in the streambank. The toe of the creek bank supporting the fascines would be stabilized using native rock, or similar, to reduce scour. In addition, erosion control components will be installed to address downstream erosion. These components will include an inlet, a storm drain, and a reinforced box culvert. The culvert will address erosion within the creek by stabilizing existing infrastructure, dissipating flow velocity through placement of natural material, and protecting natural creek features via proper flow conveyance.
- **Monitoring and Maintenance:** To facilitate post-restoration monitoring/maintenance, the Project will include access upgrades to a drive aisle and an extension of an existing sidewalk by approximately 25 feet, where a rolled curb and permeable vehicular grade materials will be installed. Following a 120-day post-restoration effort, the Project will adhere to a five-year restoration maintenance and monitoring period that will be administered by the Proponent. Following this period, a long-term management plan (LTMP) will be established and will include meeting specified success criteria. During this time, maintenance work may be necessary to ensure function.

The Project is designed to be consistent with the City's Multiple Species Conservation Program (MSCP) Subarea Plan and will adhere to conservation measures detailed in the MSCP and/or Multi Habitat Planning Area (MHPA). This Project is voluntary and not required mitigation action under the MSCP.

Tribal Engagement: The Proponent coordinated with local tribes during the planning stages of this Project and completed an Archaeological Resource Report in 2013. In May of 2025, the Project team sent consultation letters to Tribes identified by the Native American Heritage

Commission. Tribal Representatives were invited to advise the Project team. Comments were received from the Viejas Band of Kumeyaay Indians. The Proponent has also informally reached out to Kumeyaay Traditional Ecological Knowledge (TEK) practitioners that teach at the University of California, San Diego and the Kumeyaay Community College. These TEK practitioners will provide training on Kumeyaay streambed management.

Interested Party Coordination: The City and the Proponent have coordinated on public engagement starting in November 2010 with an initial community meeting. Additional community workshops and planning sessions with the City's Parks and Recreation Department, Open Space Division and local professionals have led to consensus on needs and benefits the Project has. The City Heights Urban Greening Plan was adopted by the City Council in 2014 after public comment, identifying Manzanita Canyon as an opportunity to increase natural open space within the urban landscape of San Diego. Furthermore, the Proponent worked with multiple City departments to develop the current planning documents to ensure alignment with existing City plans and policies.

Anticipated Project Implementation Timeframes:

Start date: November 2025

Completion date: March 3031

Lead Agency Request for CDFW Concurrence: On September 19, 2025, the Director of the California Department of Fish and Wildlife (CDFW Director) received a concurrence request from the Lead Agency pursuant to Public Resources Code section 21080.56, subdivision (e) (Request). The Request seeks the CDFW Director's concurrence with the Lead Agency's determination on September 18, 2025 that the Project meets certain qualifying criteria set forth in subdivisions (a) to (d), inclusive, of the same section of the Public Resources Code (Lead Agency Determination). The CDFW Director's concurrence is required for the Lead Agency to approve the Project relying on this section of the California Environmental Quality Act (CEQA). (Pub. Resources Code, § 21000 et seq.).

Concurrence Determination

The CDFW Director concurs with the Lead Agency Determination that the Project meets the qualifying criteria set forth in Public Resources Code section 21080.56, subdivisions (a) to (d), inclusive (Concurrence).

Specifically, the CDFW Director concurs with the Lead Agency that the Project meets all of the following conditions: (A) the Project is exclusively to conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or is exclusively to restore or provide habitat for California native fish and wildlife; (B) the Project may have public benefits incidental to the Project's fundamental purpose; (C) the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery; and includes procedures and ongoing management for the protection of the environment; and (D) Project construction activities are solely related to habitat restoration. Pursuant to Public Resources Code section 21080.56, subdivision (g),

CDFW will post this Concurrence on its CEQA Notices and Documents internet page: <https://wildlife.ca.gov/Notices/CEQA>.

This Concurrence is based on best available science and supported, as described below, by substantial evidence in CDFW's administrative record of proceedings for the Project.

This Concurrence is also based on a finding that the Project is consistent with and that its implementation will further CDFW's mandate as California's trustee agency for fish and wildlife, including the responsibility to hold and manage these resources in trust for all the people of California.

Discussion

- A. Pursuant to Public Resources Code section 21080.56, subdivision (a), the CDFW Director concurs with the Lead Agency that the Project will exclusively conserve, restore, protect, or enhance, and assist in the recovery of California native fish and wildlife, and the habitat upon which they depend; or restore or provide habitat for California native fish and wildlife.

The Project will restore an approximately one-mile reach of stream and associated native habitat. Stream and habitat restoration of Manzanita Creek will reduce erosion and enhance water quality within the impaired Pueblo watershed and upstream of the 303(d)-listed Chollas Creek/San Diego Bay. Furthermore, the native habitat restoration component will provide enhanced breeding and foraging habitat for federally-listed California gnatcatcher and state-candidate listed Crotch's bumble bee through the creation of coastal sage scrub. The Project will also remove invasive plant species and reestablish native plant species such as the wart-stemmed ceanothus (*Ceanothus verrucosus*) and Nuttall's scrub oak (*Quercus dumosa*).

- B. Pursuant to Public Resources Code section 21080.56, subdivision (b), the CDFW Director concurs with the Lead Agency that the Project may have incidental public benefits, such as public access and recreation.

The Project may incidentally include public access and public health/safety benefits, including flood and/or fire risk reduction.

As part of the monitoring/maintenance component of the Project, an existing public sidewalk will be extended by approximately 25 feet. In addition to supporting post-restoration monitoring and maintenance, the extended path may also incidentally serve as a route for public access. The extended sidewalk will also function to reduce erosion through bank stabilization and reduce the impact of stormwater events that would otherwise contribute to sedimentation on the site. Other streambed stabilization components will include installation of an inlet, a storm drain, and a reinforced box culvert. The location of these features will be limited to areas where they are necessary to protect the habitat benefits of the Project. These features will stabilize existing erosive conditions while allowing surface water to penetrate the permeable surface of the drive aisle to assist in the management of highly concentrated

stormwater flow. As a result, an incidental benefit of these features may also serve to reduce the risk of urban flood damage.

The Habitat Restoration component of the Project includes the removal of non-native vegetation, such as Peruvian pepper tree (*Schinus molle*), Brazilian pepper tree (*Schinus terebinthifolia*), and eucalyptus trees, and replanting of native vegetation. In addition to restoring habitat, these activities may also reduce the risk of catastrophic wildfire within an urbanized portion of the City.

- C. Pursuant to Public Resources Code section 21080.56, subdivision (c), the CDFW Director concurs with the Lead Agency that the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery, and includes procedures and ongoing management for the protection of the environment.

Long-term Net Benefits to Climate Resiliency:

With climate change, storms are anticipated to be flashier and less predictable. Infrequent, but larger amounts of rainfall would increase the canyon's erosion and scour potential that may affect the Project area, the broader canyon, and the adjacent sensitive habitats. The Project's habitat restoration measures are expected to provide a buffer from the negative effects of climate change by establishing a more stable creek and resilient floodplain, a native plant palette that is more drought resilient to account for less frequent rain events, and the creation of native habitat for sensitive species to support and increase biodiversity within the canyon. The Project is also expected to provide a more suitable bank for carbon sequestration through the planting of native vegetation and approximately 240 native trees.

Long-term Net Benefits to Biodiversity:

The Project will provide long term benefits to biodiversity by restoring native habitats within an urban area of the City. This type of habitat has historically been on the decline in the region, and thus restoration of this habitat is becoming critical in providing refugia for native wildlife and supporting the San Diego region's biodiversity. Furthermore, the Project supports the City's MHPA, which is part of a commitment to long-term protection of sensitive habitats that provide the needed areas for 85 covered species. The Project involves restoring habitat consisting of a diverse palette of native vegetation, including coastal sage scrub to benefit California gnatcatcher and other native scrubland adapted common species, such as orange-throated whiptail (*Aspidoscelis hyperythra*) and rufous-crowned sparrow (*Aimophila ruficeps*). The Project also includes establishment of oak chaparral, which is expected to result in long-term benefit for wart-stemmed ceanothus and other nectar-bearing flower and flowing shrub species.

Long-term Net Benefits to Sensitive Species Recovery:

A California gnatcatcher was incidentally observed during biological surveys in the area. The Project's restoration of large areas of coastal sage scrub will create long-term gnatcatcher breeding habitat in the canyon, which will help to assist in the recovery of this species in the area.

The Project is also expected to provide long-term net benefit to Crotch's bumble bee, which was recently identified as a state candidate species. Nesting and foraging habitat for this species includes flowering shrubs and nectar-bearing plants in upland habitats. The Project is specifically designed to include bumble bee foraging plants, such as narrow leaf milkweed (*Asclepias fascicularis*), California buckwheat (*Eriogonum fasciculatum*), white sage (*Salvia apiana*), and black sage (*Salvia mellifera*), and opportunities for the creation of nests.

Furthermore, two sensitive plant species, the wart-stemmed ceanothus and Nuttall's scrub oak were found in the canyon and will be preserved by the restoration of the canyon.

Procedures for the Protection of the Environment:

The Project includes measures to ensure the protection of biological resources within the Project area. Sensitive species, including the California gnatcatcher, will be protected by conducting pre-project biological surveys, performing work within seasonal work windows to avoid breeding and migratory bird nesting seasons, and implementing ongoing biological monitoring during the Project. Fencing will delineate work areas to protect inadvertent impacts to biological resources and habitat. During restoration activities, a biological monitor will verify, on daily monitoring logs, that no trash stockpiling, oil dumping, fueling of equipment, storage of hazardous wastes or equipment/material, parking, or other Project related activities shall occur adjacent to sensitive habitat.

Ongoing Management for the Protection of the Environment:

The Project includes a post-restoration monitoring and maintenance period of 120 days, and the LTMP.

During the 120-day period following restoration, Project success standards will be measured to ensure proper hydrologic function and native plant establishment. Photo points will be established across the site, and photographs will be taken from the same vantage points at the 30-, 60-, 90-, and 120-day establishment intervals. A shapefile will be created with the photo point locations for use during long-term monitoring. Recommended 120-day success criteria for wetland and upland habitat are as follows: (1) free of weeds, trash, and significant erosion problems; (2) achieving 90 percent survival of planted container species; and (3) replacement of all dead plants and no pests and diseases.

Following the 120-day post-restoration effort, the Project will adhere to a five-year restoration maintenance and monitoring period that will be administered by the Proponent. During the five-year period maintenance/monitoring activities shall focus on creating conditions favorable to the establishment of plants to a self-sufficient state, and also include a maintenance program, installation entity/contractor education and guarantees, weed control, pest and disease management, trash removal, a monitoring program, success and performance criteria, monitoring methodologies, and annual reports. If necessary, remediation may be implemented to ensure Project function.

Following the five-year post-restoration maintenance and monitoring period, the City, and/or a contracted third party, will manage the site in perpetuity. The LTMP will guide ongoing management of the site. At a minimum, management measures would entail the following: regular and frequent invasive species removal; trespass and access control; trash removal; repair of any damage to plantings and stabilization features; erosion control; and sediment removal (as needed).

- D. Pursuant to Public Resources Code section 21080.56, subdivision (d), the CDFW Director concurs with the Lead Agency that the Project does not include any construction activities, except those solely related to habitat restoration.

By addressing erosion, stabilizing creek function, and establishing habitat for native species, any construction is solely related to habitat restoration purposes. As part of the hydrologic improvements and streambed stabilization component of the Project, light machinery will be utilized to accomplish proper drainage and creek function, and to install all Project components. This will help stabilize the upstream portion of the creek and allow for the long-term viability downstream of the Project.

Scope and Reservation of Concurrence

This Concurrence is based on the proposed Project as described by the Lead Agency Determination and the Request. If there are any subsequent changes to the Project that affect or otherwise change the Lead Agency Determination, the Lead Agency, or any other public agency that proposes to carry out or approve the Project, shall submit a new lead agency determination and request for concurrence from CDFW pursuant to Public Resources Code section 21080.56. If any other public agency proposes to carry out or approve the Project subsequent to the effective date of this Concurrence, this Concurrence shall remain in effect and no separate concurrence from CDFW shall be required so long as the other public agency is carrying out or approving the Project as described by the Lead Agency Determination and the Request.

In its request for a concurrence, the Lead Agency set forth potential bases for a determination that the Project will result in long-term net benefits to climate resiliency, biodiversity, and sensitive species recovery. Although the CDFW Director agrees with the Lead Agency that the Project will provide such long-term net benefits, this Concurrence is not intended to be and should not be construed as an endorsement of every argument set forth in the Lead Agency's concurrence request.

Except for how the Project will support the conservation objectives of the MSCP or MHPA, this Concurrence does not analyze or consider the Project being used to satisfy any other avoidance, minimization, or mitigation requirement for a regulatory permit or approval, regulatory enforcement action or settlement, court order, or other enforceable legal obligation.

Other Legal Obligations

The Project shall remain subject to all other applicable federal, state, and local laws and regulations, and this Concurrence shall not weaken or violate any applicable environmental or public health standards. (Pub. Resources Code, § 21080.56, subd. (f).)

CDFW Director's Certification

By:  _____

Charlton H. Bonham, Director
California Department of Fish and Wildlife

Date: 11/14/2025