



## 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 MCSP, including the following:

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

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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)