

COASTAL CONSERVANCY

Staff Recommendation  
June 7, 2021

**SAN DIEGO COUNTY WILDFIRE RESILIENCE**

Project No. 21-031-01  
Project Manager: Joel Gerwein

**RECOMMENDED ACTION:** Authorization to disburse up to \$661,367 to the Urban Corps of San Diego to conduct fuel modification for wildfire resilience in open space in the City of Chula Vista and in seven San Diego County preserves; and adoption of findings under the California Environmental Quality Act.

**LOCATION:** Chula Vista, Escondido, Solana Beach, Encinitas, Campo, and Pine Valley in San Diego County

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EXHIBITS

- Exhibit 1: [Project Location Maps](#)
- Exhibit 2: [Fire Hazard Maps](#)
- Exhibit 3: [Final Environmental Impact Report and Mitigation, Monitoring, and Reporting Program for the Issuance of Take Authorizations Due to Urban Growth Within the Multiple Species Conservation Program Planning Area, Addendum to the Final Environmental Impact Report for the Multiple Species Conservation Program, and Supplemental Environmental Impact Report for the Chula Vista Multiple Species Conservation Program Subarea Plan](#)
- Exhibit 4: [Site Photographs](#)

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**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 six hundred sixty-one thousand three hundred sixty-seven dollars (\$661,367) to the Urban Corps of

San Diego (“the grantee”) to conduct fuel modification for wildfire resilience in open space in Chula Vista and in seven San Diego County preserves.

1. Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:
  - a. A detailed work program, schedule, and budget.
  - b. Evidence that all permits and approvals required to implement the project have been obtained.
2. The grantee shall submit evidence that it has permission to implement the project from all project site landowners.
3. If the grantee uses the grant funds to purchase equipment costing \$5,000 or more, the grantee shall use such equipment for wildfire-relate purposes for the duration of the useful life of the equipment.

Findings:

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

1. The proposed authorization is consistent with Chapter 3 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 Urban Corps of San Diego is a nonprofit organization organized under section 501(c)(3) of the U.S. Internal Revenue Code.
4. The Conservancy has independently reviewed and considered the Final Environmental Impact Report (EIR) for the Issuance of Take Authorizations For Threatened and Endangered Species Due to Urban Growth Within the Multiple Species Conservation Program Planning Area certified by the City of San Diego in January 1997, the Addendum to the Final EIR adopted by the City of Chula Vista in October 2000, and the Supplemental EIR for the Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan adopted by the City of Chula Vista on May 13, 2003 pursuant to the California Environmental Quality Act (“CEQA”) and attached to the accompanying staff recommendation as Exhibit 3. The Conservancy finds that the Chula Vista component of 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.”

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**STAFF RECOMMENDATION**

## **PROJECT SUMMARY:**

Staff recommends the Conservancy authorize a \$661,367 grant to the Urban Corps of San Diego (“the grantee”) to conduct fuel modification for wildfire resilience in open space in Chula Vista and in seven San Diego County preserves (Exhibit 1). Treatment areas in both Chula Vista and in County Preserves are in Wildland Urban Interface (WUI) zones near development and infrastructure that is at risk from wildfire. Treatment areas within Chula Vista open spaces total 18 acres. Treatment areas in County Preserves total 31 acres. Urban Corps youth-led environmental crews will provide the labor for the project. Urban Corps provides young adults from underserved, low-income communities with the tools to expand their career opportunities through education, life skills training, and paid work experience on projects that benefit their own communities and the public at large. Urban Corps’ unique work-learn program allows youth to finish high school while earning a paycheck, learning real-world job skills, and giving back to the community through professional services.

The project is needed to reduce the risk of loss of life and property due to catastrophic wildfire. Fuel treatment will decrease wildfire risks around communities, homes, infrastructure, and other highly valued resources. Chula Vista open space and County Preserve treatment areas are in “Moderate to High” Fire Hazard Severity Zones (Exhibit 2).

### Chula Vista

Treatment areas in Chula Vista are high-priority fuel reduction areas that were identified in coordination with the City’s Fire Department and Public Works Department. There are approximately 300 homes bordering the Chula Vista project area, which are at high risk for wildfire as they experienced the 2003 and 2007 wildfire events in San Diego County.

Fuel treatment in Chula Vista will create up to 100 feet of defensible space on the perimeters of the canyons and open spaces, with the most heavily cleared areas along fence lines adjacent to homes. By creating fuel breaks and defensible space at the top of canyon rims, the project will protect the community in the WUI from fires originating in the canyons. The prescription includes 10 feet of clearance between property lines and open space in the WUI at the top of the canyon slopes, and 30-100 feet of fuel reduction and thinning down the slope into the canyon based on recommendations of the Fire Marshal. Native shrubs and plants will be thinned and left in place to prevent erosion. Nonnative species will be targeted for removal where possible to reduce fuel loading.

### County Preserves

Project activities in the County Preserves will include creating and maintaining fuel breaks, vegetation management, removal of dead fallen trees, and removing or thinning vegetation to create defensible space around high value assets. Resource Management Plans or Vegetation Management Plans have been prepared for four of the Preserves (Del Dios, San Eligo Lagoon, Sage Hill, and Escondido Creek), and these plans designate priority areas for fuel treatments, such as along roadways that are critical for access and in parts of the preserve that are adjacent to residential and other development (Exhibit 2). The project will further the San Diego County Fire strategic plan goals of enhancing pre-fire vegetation management and reducing potential for loss of existing structures. To minimize impacts to the preserves, thinning will occur in

accordance with best management practices and work will be done by hand crews using pruning tools and small bar chainsaws.

Urban Corps will work with the County of San Diego's Department of Parks and Recreation (DPR) and other agencies including local fire departments to educate the neighbors about what they can do to minimize the risk of fire to their property. Where habitat extends from the Reserve on to private property, a courtesy tagging of sensitive species will be offered to private property owners who receive a Notice and Order from the Fire Department for vegetation management on their property.

**Site Description:**

Chula Vista

Treatment areas in Chula Vista are owned by the City and comprise 18 acres. The open spaces in Chula Vista where treatment will occur are Rice Canyon, Choya Canyon, Chute Canyon, Snake Canyon, Surrey Ridge, Barons Canyon, Elevado Canyon, Church Canyon, Independence Canyon, Bonita Long Canyon, Goats Hill, Glen Abbey Saddle, Telegraph Canyon, Del Rey Canyon, and Lynwood Hills. They consist primarily of the upper slopes of large east west trending urban canyons that are surrounded by extensive residential development. In addition to the canyons, the treatment areas include some hillside, ridge, and saddle areas. There are approximately 300 homes bordering the Chula Vista treatment areas. The canyons and hillsides are densely vegetated with coastal sage scrub, chaparral, and maritime succulent scrub, with some areas of riparian vegetation along canyon bottoms.

County Preserves

Treatment areas in the County Preserves are owned by San Diego County and comprise 31 acres. The County preserves where fuel modification would take place are the Del Dios, Escondido Creek, San Elijo Lagoon, Magdalena Ecke, Sage Hill, Pine Valley Meadow, and Star Ranch Preserves located in the communities of Solana Beach, Encinitas, Escondido, Campo, and Pine Valley. Below are brief descriptions of each of the preserves where treatment will occur. Note that the acreage given for each preserve in the descriptions below refers to the entire preserve, not to the smaller area where fuel treatment will take place.

Pine Valley County Park is a 17-acre open space in Pine Valley that includes a grassland meadow bordered by sage scrub, with a school, houses, and other buildings in the immediate vicinity. Vegetation treatment in this park will focus on managing fuels on the edges of the park and in defensible space zones around roads, buildings and accessways.

Star Ranch is a 2,151-acre open space in the unincorporated community of Campo in the southeastern part of the County. San Diego County acquired this preserve on April 23, 2021. The vegetation communities on Star Ranch include southern mixed and chamise chaparral, flat-topped buckwheat scrub, non-native grasslands, oak woodland, and alkali marsh. The Star Ranch property contains a mix of chaparral, wetlands and stream-side habitat which support endangered species, including the arroyo toad and least Bell's vireo, a rare songbird.

Magdalena Ecke Preserve is 29.8-acre open space in the City of Encinitas. Vegetation communities within the preserve include southern maritime chaparral, Diegan coastal sage scrub, and riparian woodlands.

Del Dios Highland Preserve is a 774-acre open space in Escondido. The predominant vegetation community within the Preserve is southern mixed chaparral. Other vegetation communities in the Preserve include coast live oak woodland, southern coast live oak riparian forest, eucalyptus woodland, Diegan coastal sage scrub, non-native grassland, and southern willow scrub. The Preserve is comprised of moderately to steeply sloping terrain, with San Elijo Canyon and Escondido Creek crossing through the Preserve's northwest portion. The Preserve is surrounded by the city of Escondido to the north and east, Lake Hodges and the community of Del Dios to the east, unincorporated land to the south, and the Elfin Forest Recreational Reserve and Olivenhain Reservoir to the west. The Preserve is classified as a Very High Fire Hazard Severity Zone by CalFire.

Escondido Creek Preserve consists of 347-acres located in the Elfin Forest community of unincorporated San Diego County, California. The predominant vegetation community within the Preserve is southern mixed chaparral. Other vegetation communities in the Preserve include Diegan coastal sage scrub, non-native grassland, southern coast live oak riparian forest, southern willow scrub, coast live oak woodland, eucalyptus woodland, southern riparian woodland, valley needlegrass grassland, and non-native vegetation. The Preserve is classified as a Very High Fire Hazard Severity Zone by CalFire and is located within a fuel management priority area as identified by the County's 2009 Forest Area Safety Task Force. Parts of the Preserve abut rural residential development.

Sage Hill Preserve consists of 232 acres located in the Elfin Forest community of unincorporated San Diego County. The Preserve's terrain contains primarily moderate to steep slopes with some flat terrain along the top of the ridgelines. The vegetation on the Preserve is dominated by Diegan coastal sage scrub, and southern maritime chaparral. Other vegetation communities include freshwater marsh, coastal sage-chaparral scrub, southern coast live oak riparian forest, non-native grassland, disturbed habitat, and tamarisk scrub. Sage Hill Preserve is in a wildfire-prone area and has been mapped by CalFire as a Very High Fire Severity Zone. It abuts private residences on its northwestern boundary.

The San Elijo Lagoon Ecological Preserve consists of 904-acres of open space located between the cities of Solana Beach and Encinitas. Much of the Preserve is made up of estuarine wetlands. However, parts of the Preserve are dominated by dense, woody coastal sage scrub, maritime chaparral, south slope chaparral, and scrub oak/chaparral mix. These vegetation communities are adjacent to residential development and pose a threat to life and property from catastrophic wildfire.

**Grant Applicant Qualifications:** Urban Corps is highly qualified to carry out the project. Urban Corps' Environmental Services Department youth crews regularly conduct vegetation management for fire safety. In 2020, Urban Corps crews conducted fuel treatments at multiple sites, including Chula Vista, the City of San Diego, and the Lusardi Creek County Preserve, comprising over 25 acres of treatment areas. Crews receive training to ensure safe and environmentally sound practices are utilized. For this project, Urban Corps will work with open

space managers from the City of Chula Vista and the San Diego County Department of Parks and Recreation, whose expertise will facilitate successful project implementation. Urban Corps has successfully managed multiple grants from a variety of funders, including other state agencies such as CalFire.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$661,367</b>
City of Chula Vista	\$112,000
<b>Project Total</b>	<b>\$773,367</b>

The anticipated source of funding is a Fiscal Year 2020-21 special appropriation from the General Fund to the Conservancy. This appropriation was part of a package of funding for the purpose of urgent wildfire risk reduction. The proposed project is consistent with the anticipated funding source.

Unless specifically labelled “Required Match” the other sources of funding listed above are provided as estimates. 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.

The County of San Diego will provide \$12,500 in in-kind match consisting of Parks staff supervision of Urban Corps crews.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

The recommended project would be undertaken pursuant to Section 31113 of Chapter 3 of Division 21 of the Public Resources Code, which authorizes the Conservancy to address the impacts and potential impacts of climate change on resources within the Conservancy’s jurisdiction (Section 31113(a)).

Pursuant to Section 31113(b), the Conservancy is authorized to award grants to nonprofit organizations and public agencies to undertake projects that include reducing greenhouse gas emissions, and addressing extreme weather events, sea level rise, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources.

Pursuant to Section 31113(c), the Conservancy must prioritize grants for projects that maximize public benefits and have one of several purposes, including reducing emissions of greenhouse gases.

Consistent with these sections, the proposed project maximizes public benefits and is a priority because it facilitates the reduction of greenhouse gas emissions from increased wildfires due to climate change. Besides reducing greenhouse gas emissions, the public benefits include improvement of forest health and protection of life, property, public health, water quality, and natural resources.

The proposed project addresses resources within the Conservancy's jurisdiction by improving forest health and reducing the risks of wildfire that would adversely impact water quality and habitat in a coastal watershed (Chapter 5.5 of Division 21 of the Public Resources Code).

**CONSISTENCY WITH CONSERVANCY'S [2018-2022 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):**

Consistent with **Goal 8, Objective C** of the Conservancy's 2018-2022 Strategic Plan, the proposed project will implement projects to increase resilience to climate change impacts using nature-based solutions and other multi-benefit strategies.

**CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:**

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

**Required Criteria**

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Promotion and implementation of state plans and policies:**

The proposed project will help implement:

- [California's Wildfire and Forest Resilience Action Plan](#) (Governor's Forest Management Task Force, January 2021), which calls for activities such as fuels reduction, forest thinning, vegetation management, prescribed fire, shaded fuel breaks, defensible space, and enhancement of fire-prone habitats to reduce fire risk.
- The [California Forest Carbon Plan](#) (CNRA, 2018), which calls for restoration of natural fire regime and forest composition through a multitude of approaches including thinning, prescribed burns, invasive vegetation management, and shaded fuel breaks.
- The [Community Wildfire Prevention & Mitigation Report](#) (Cal Fire, 2019), which urges state and local agencies to implement the goals of the Carbon Forest Plan and lays out recommendations to agencies to increase the scale and pace of management and mitigation actions to improve forest health and resiliency.
- The [Forests and Rangelands Companion Plan, California State Wildlife Action Plan Update](#) (CDFW 2015), which encourages projects that seek to create a healthier and more resilient forest ecosystem.
- The [Environmental Goals and Policy Report "A Strategy for California @ 50 Million, Supporting California's Climate Change Goals"](#) (OPR, 2015), Goal 6 of the Steward and

Protect Natural and Working Landscapes section, which calls on the State to “Build resilience into natural systems and prioritize natural and green infrastructure solutions”.

4. **Support of the public:** There is enormous public support for wildfire risk reduction. A statewide poll last fall found that 74% of surveyed voters believe that wildfire threat is greater now than in the past.
5. **Location:** The proposed project is located in the Coastal Conservancy’s jurisdiction.
6. **Need:** California is facing unprecedented fire risk due to climate change and a growing populace. The proposed funding was approved to accelerate fire risk reduction projects in advance of next year’s fire season. This funding is needed to initiate this work as soon as possible.
7. **Greater-than-local interest:** Minimizing wildfire risk is of statewide significance.
8. **Sea level rise vulnerability:** The subject land is situated well above current and projected Year 2100 sea levels.

#### **Additional Criteria**

9. **Urgency:** California is facing unprecedented fire risk due to climate change and a growing populace. The 2020 fire season broke numerous records. The proposed project is urgently needed to reduce fire risk in advance of the upcoming fire season.
10. **Resolution of more than one issue:** This project addresses three major issues: it seeks to reduce wildfire risk, improve forest health, and will be focused on areas where homes and communities are most at risk, the wildland-urban interface (WUI).
11. **Readiness:** The project is ready to begin work immediately.
12. **Vulnerability from climate change impacts other than sea level rise:** The project will address fire resiliency in the context of anticipated climate change. Fire resilience is a critical issue due to increased average temperatures, reduced marine fog and longer and more severe droughts.
13. **Minimization of greenhouse gas emissions:** This project seeks to mitigate GHG emissions from catastrophic wildfires by lessening the fire risk, improving resilience to fire, and improving carbon sequestration.

#### **CEQA COMPLIANCE:**

**Chula Vista:** Regarding the project activities in Chula Vista, staff has independently evaluated the Final Environmental Impact Report (FEIR) for the Issuance of Take Authorizations for Threatened and Endangered Species Due to Urban Growth Within the Multiple Species Conservation Program Planning Area and associated Mitigation Monitoring and Reporting Program<sup>1</sup> (MMRP) adopted by the City of San Diego in January 1997 (Exhibit 3). Staff has also

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<sup>1</sup> The MMRP for the FEIR is found on pp. 561-601 of Volume 2 of the FEIR.



independently evaluated the Addendum to the FEIR for the Chula Vista Multiple Species Conservation Program (MSCP) Subarea Plan adopted by the City of Chula Vista in October 2000, and the Supplemental EIR for the Chula Vista MSCP Subarea Plan adopted by the City of Chula Vista on May 13, 2003. Staff concurs that there is no substantial evidence that the proposed project will have a significant effect on the environment. Staff therefore recommends that the Conservancy find that the Chula Vista component project as mitigated avoids, reduces, or mitigates the possible significant environmental effects to a level of less-than-significant and that there is no substantial evidence that the project will have a significant effect on the environment as that term is defined by 14 Cal. Code Regs. §15382.

The project's vegetation treatment activities are analyzed in the 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 guidelines provided in subarea plans for preserve management activities. For fuel management in the Chula Vista preserves, these guidelines consist of the Area Specific Management Directives (ASMDs) that have been developed for Preserve areas throughout the City of Chula Vista and are detailed in the Chula Vista Central City Preserve ASMDs for Preserve Management Area 4,<sup>2</sup> prepared in 2004 as part of the City of Chula Vista MSCP Subarea Plan. The ASMDs include specific directions for each Preserve area regarding brush management. The ASMDs include Guidelines for Sensitive Species Avoidance as well as Guidelines for Maintenance in Brush Management Areas. Implementation of the ASMDs below will mitigate the project's potential impacts to a less than significant level. These ASMDs are listed in Section 8.3 (pp.81-82) of the Central City Preserve ASMDs:

- Assess the potential for covered and sensitive species to be impacted by brush management activities. The Baseline Biological Resources Report and subsequent monitoring survey reports should be reviewed to determine if sensitive species are known in the vicinity of the brush management area.
- Field check the site prior to any clearing and thinning of vegetation to verify that covered and sensitive species have not moved into the area since the baseline surveys, or subsequent monitoring surveys, were completed.
- If sensitive species are located in or adjacent to the proposed brush management area and may be impacted, then site-specific minimization measures, such as focusing clearing and/or thinning efforts on the non-covered species will be developed.
- When implementing brush management actions, the goal within the Preserve is to maintain functional habitat while reducing fuel loads to levels recommended by the Fire Marshal. Disturbance to native herbaceous and succulent vegetation may be necessary for brush management, but it should be minimized. No disturbance of surface soils,

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<sup>2</sup> Available at: [https://sdmmp.com/view\\_article.php?cid=CID\\_ctamanah%40usgs.gov\\_5762f24c977cf](https://sdmmp.com/view_article.php?cid=CID_ctamanah%40usgs.gov_5762f24c977cf)

rocks, lichens, mosses, or other cryptogams should occur within the brush management areas.

- Brush management activities should be scheduled for the summer and fall, outside the rainy season and growing season when soils and herbaceous growth are more easily impacted and wildlife breeding activity is under way.
- The Habitat Manager should clearly flag shrubs for removal or thinning prior to the fuel reduction activity, and only marked shrubs should be removed or thinned. Criteria to be used in flagging shrubs for removal include maintaining the maximum allowable shrub cover, the maximum possible shrub species diversity, and known nesting sites for California coastal gnatcatcher.

Project activities are consistent with the City's MSCP Subarea Plan. Consistent with the City's MSCP Subarea Plan<sup>3</sup>, the project will carry out hand treatment of brush up to 100 feet from structures on the edge of the preserves under the direction of the Fire Marshal. 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.

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

**San Diego County Preserves:** Project activities in the seven San Diego County Preserves are exempt from environmental review under the California Environmental Quality Act (CEQA) pursuant to the CEQA Guidelines at California Code of Regulations, Title 14, Sections 15304, 15301, and 15269.

Section 15304 (Minor Alterations) exempts projects that consist of minor alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes.

Section 15301 (Existing Facilities) exempts projects that consist of operation, repair, maintenance, or minor alterations of existing structures, facilities, or topographical features, involving negligible expansion of existing or former use of the site. Such projects include, but are not limited to, management of existing landscaping or native growth.

Section 15269 (Emergency Projects) exempts emergency projects, including: emergency repairs to serviced facilities necessary to maintain service essential to the public health, safety, or welfare, including those repairs that require a reasonable amount of planning to address and anticipated emergency; and specific actions necessary to prevent or mitigate an emergency.

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

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<sup>3</sup> (<https://www.chulavistaca.gov/home/showdocument?id=7106> (pp. 7-17 - 7-20))