



COUNTY OF SAN DIEGO

AGENDA ITEM

BOARD OF SUPERVISORS

NORA VARGAS
First District

JOEL ANDERSON
Second District

TERRA LAWSON-REMER
Third District

NATHAN FLETCHER
Fourth District

JIM DESMOND
Fifth District

DATE: April 26, 2022

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TO: Board of Supervisors

SUBJECT

SAN DIEGO COUNTY FIRE – ROADSIDE VEGETATION MANAGEMENT FOR EVACUATION PREPAREDNESS PROGRAM: CONSIDER THE USE OF AN EXEMPTION UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AND AUTHORIZE SINGLE SOURCE PROCUREMENT (DISTRICTS: ALL)

OVERVIEW

The County of San Diego continues to prioritize fire prevention and preparedness as the frequency and severity of wildfire disasters worsen throughout the state. Within the unincorporated county, the Department of Public Works (DPW) conducts annual mowing along roads for roadside safety. In addition, San Diego County Fire (County Fire) manages vegetation for fire safety in public areas and enforces related fire-safety-requirements on private property.

On March 16, 2021 (1), the San Diego County Board of Supervisors (Board) directed the Chief Administrative Officer (CAO) to explore options to expand roadside vegetation management to better protect local communities from future fire incidents. Upon returning to the Board on July 13, 2021 (1), County Fire and DPW presented options for a *Roadside Vegetation Management for Evacuation Preparedness Program*. The Board directed the CAO to 1) develop a comprehensive, countywide approach to vegetation management, and return to the Board after identifying a funding source and preparing an implementation timeline, and 2) continue stakeholder outreach related to the Defensible Space for Fire Protection Ordinance and return to the Board with a proposal to amend it to align with the County Consolidated Fire Code.

On October 5, 2021 (2) County Fire and DPW returned to the Board with proposed amendments to the Defensible Space for Fire Protection Ordinance, which the Board adopted. Also, on October 5, 2021 (5), County Fire and DPW provided an update and requested initial resources to evaluate the proposed *Roadside Vegetation Management for Evacuation Preparedness Program*. Since that time, County Fire and DPW have identified 200 lane-miles of critical evacuation corridors with single entry and exit points that may benefit from additional roadside vegetation management for fire safety and retained a consultant to review the proposed project, which found no potentially significant impacts to the environment. In addition, County Fire evaluated long-term fire retardants for use in certain areas along the 200 lane-miles, to be used in combination with vegetation management. County Fire selected PHOS-CHEK FORTIFY®, given its approval by the U.S. Forest Service for use in federal and state forest areas, effectiveness, and durability.

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Today’s proposed actions by the Board include finding that the *Roadside Vegetation Management for Evacuation Preparedness Program* is exempt from the California Environmental Quality Act, authorizing a single source procurement of fire retardant for an initial term of one year and four option years, and approving the *Roadside Vegetation Management for Evacuation Preparedness Program*, as described in this letter.

**RECOMMENDATION(S)
CHIEF ADMINISTRATIVE OFFICER**

1. Find that the proposed actions related to roadside vegetation management are exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Sections 15301 and 15304(i).
2. In accordance with Board Policy A-87, Competitive Procurement, approve and authorize the Director of Purchasing and Contracting to enter into negotiations with Perimeter Solutions LP, and subject to successful negotiations and determination of a fair and reasonable price, award a contract for PHOS-CHEK FORTIFY® brand fire retardant for a one-year period with four options years and an additional six months, if needed, and to amend the contract as needed to reflect changes to requirements and funding. Waive the competitive procurement requirements of Board Policy A-87.
3. Authorize San Diego County Fire Protection District to implement the *Roadside Vegetation Management for Evacuation Preparedness Program*, as described in this letter.

EQUITY IMPACT STATEMENT

More than 80 percent of the San Diego County Fire jurisdictional area qualifies as a disadvantaged unincorporated community, based on a San Diego Local Agency Formation Commission (LAFCO) report on the funding, administration, and performance of the former County Service Area No. 135 (now San Diego County Fire Protection District). Roadside vegetation management decreases the likelihood of entrapment, loss of life, and loss of property for residents of wildfire-prone unincorporated areas. A total of 79% of the unincorporated area in San Diego County is designated as High or Very High Fire Hazard Severity Zones.

County Fire offers support and education to help individuals who have barriers, such as ability, age and financial resources, and works with local Fire Safe Councils and other community organizations to achieve compliance with requirements for defensible space. In addition, County Fire and the California Department of Forestry and Fire Protection (CAL FIRE) San Diego Unit staff refer individuals to grant-funded programs that assist with this work.

The Department of Public Works (DPW) utilizes data from road crews and community input, along with information gathered from California’s Healthy Places Index, to identify areas along public roads to conduct vegetation management for roadside safety. As part of routine maintenance operations, DPW will coordinate with County Fire on their planned list of roads and scheduling. These actions are anticipated to positively impact equity and enhance vegetation management along evacuation corridors.

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FISCAL IMPACT

There is no fiscal impact as a result of today’s requested actions. Subsequent years cost and revenue will be included in future Operational Plans for San Diego County Fire.

BUSINESS IMPACT STATEMENT

N/A

ADVISORY BOARD STATEMENT

On February 28, 2022, with five board members being present, the Fire Advisory Board voted unanimously to support approval of the *Roadside Vegetation Management for Evacuation Preparedness Program*.

BACKGROUND

Many of the almost 2,000 centerline miles of publicly maintained roads managed by the County of San Diego (County) traverse areas designated by the state as High or Very High Fire Hazard Severity Zones. The County has increased its focus on the importance of these roads because, during emergencies such as wildfires, residents use them as exit routes and first responders use them to reach the front lines of an incident. Roadside vegetation management is critical to ensure the roads’ continued functionality during a wildfire and to avoid entrapment, a potentially life-threatening situation in which wildfire overtakes a road.

On March 16, 2021 (1), the Board of Supervisors (Board) directed the Chief Administrative Officer (CAO) to explore options to further increase vegetation management along County roads; explore options for aligning sections of the County Code to allow for 20 feet of roadside vegetation management; identify public roads that could benefit from additional vegetation treatment; and return to the Board with options to implement a new roadside vegetation management program.

On July 13, 2021 (1), staff returned to the Board with three options for vegetation management and the Board directed the CAO to develop a comprehensive program covering the entire unincorporated area. The Board further directed the CAO to continue stakeholder outreach related to the Defensible Space for Fire Protection Ordinance (Chapter 4 of Division 8 of Title 6 of the San Diego County Code of Regulatory Ordinances) and return to the Board within 90 days with proposed ordinance amendments and the identification of a funding source for program implementation.

On October 5, 2021 (2 and 5), staff returned to the Board with a proposal to amend the Defensible Space for Fire Protection Ordinance to align with the County Consolidated Fire Code, which the Board adopted. Staff also requested initial resources to evaluate a *Roadside Vegetation Management for Evacuation Preparedness Program* and identified a funding source for startup costs, which included funding a consultant to conduct an environmental review of the proposed project. The environmental review is complete, and today’s actions include a request to find that the proposed actions are exempt from the California Environmental Quality Act (CEQA).

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With this Board’s approval of the CEQA exemption, San Diego County Fire (County Fire), in coordination with the Department of Public Works (DPW) can begin the *Roadside Vegetation Management for Evacuation Preparedness Program*.

A Comprehensive Approach. As presented on July 13, 2021 (1), the *Roadside Vegetation Management for Evacuation Preparedness Program* will go beyond just increasing roadside vegetation management. This proposed program is designed to significantly bolster various efforts that align with County Fire’s cohesive pre-fire strategy – a holistic approach to preventing wildfire *now* to reduce the risk of property loss and loss of lives *later*. County Fire will take a countywide approach by creating a new team that focuses on this specific mission, visiting each community in the unincorporated area of the county on a three-year cycle. Activities will include educating homeowners to help build an understanding of wildland fire, ensuring defensible space and structure hardening, safeguarding communities through fuels treatment, and of course, protecting evacuation corridors. County Fire will also work with others such as DPW, Caltrans, independent fire districts, and local Fire Safe Councils to collaboratively identify and cohesively manage vegetation as one team with one mission.

Protecting Evacuation Corridors. In conjunction with DPW, County Fire has identified 200 lane-miles of critical evacuation corridors where roadside vegetation management will be expanded to 20 feet, beyond the traditional 10 feet of mowing DPW already conducts in the public right-of-way. These roads were identified in collaboration with local Fire Safe Councils and fire personnel. Roadside vegetation work can begin on these roads upon the approval of today’s action items. Additionally, DPW has already commenced its expanded mileage for roadside vegetation management for motorist safety within the right-of-way, by mowing 60% more lane miles of roads this year than in Fiscal Year 2020-21 (from 500 lane miles annually to 800 lane miles).

Increased Community Engagement and Public Education. Public-facing webpages will be created to display a shared GIS map of roadside vegetation work for both County Fire and DPW, and both departments will continue public outreach to solicit feedback about current and ongoing efforts. County Fire will further increase community engagement by helping local Fire Safe Councils complete and/or review evacuation planning through their Community Wildfire Protection Plans and engaging communities with key information to build evacuation readiness. Additional engagement will include classes, mailers, multimedia videos, and social media updates.

Defensible Space and Structure Hardening. County Fire will work to reduce the potential for fire spread from wildland to structures and vice versa by performing defensible space inspections on one-third (34,000 parcels) of the total homes in the unincorporated area annually, maintaining a three-year cycle for all properties in the unincorporated area, benefitting not only the homeowner but the neighbors, responders, and surrounding lands. During the inspections, the team will also educate the public to encourage compliance with requirements and provide referrals to the Fire Safe Council of San Diego County’s Defensible Space Assistance Program. Education will also include information about home hardening and linkage to available resources.

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Fire Retardant as an Alternative to Vegetation Management. Lastly, because vegetation management may not be ideal in all scenarios, County Fire evaluated the potential for ground-applied long-term fire retardant (LTFR) to reduce the number and severity of roadside wildfire starts. County Fire found its use is beneficial and that it should be applied in certain areas along the 200 lane-miles in addition to vegetation management. LTFR contains retardant salts that alter the way fire burns, thereby decreasing fire intensity and slowing the advance of a fire. County Fire investigated suitable options for the purchase of LTFR and found that PHOS-CHEK FORTIFY® is the only fire retardant approved by the USDA Forest Service for preventative application on federal lands and most state forest lands, following rigorous testing and evaluation. In addition, it has substantial rain durability, which is imperative to preventative application. Perimeter Solutions LP is the sole provider of PHOS-CHEK FORTIFY®.

Among today's requests is a finding by the Board that the proposed project is exempt from CEQA and approval of the proposed program. This is also a request to authorize a single source procurement of PHOS-CHEK FORTIFY® from Perimeter Solutions LP for an initial term of one year and four option years.

ENVIRONMENTAL STATEMENT

Today's proposed action to approve the *Roadside Vegetation Management for Evacuation Preparedness Program* is exempt from the California Environmental Quality Act (CEQA). Section 15304 of the CEQA Guidelines exempts from CEQA minor alterations to land that do not involve the removal of healthy, mature, scenic trees. As an example, Section 15304(i) provides that fuel management activity within 30 feet of structures to reduce the volume of flammable vegetation is exempt from CEQA, provided that the activities will not result in the taking of endangered, rare, or threatened plant or animal species or specific erosion or sedimentation of surface waters. The proposed project will not involve the removal of healthy, mature, scenic trees. Attachment A contains a biological assessment of each road segment where work will be conducted and identifies sensitive species that may occur within each segment. Project design features and implementation measures will avoid impacts to such species, as outlined in the Notice of Exemption in Attachment A. In addition, the proposed action to purchase and apply PHOS-CHEK FORTIFY® along County roads is exempt pursuant to Section 15301 of the CEQA guidelines because it involves the maintenance or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use.

LINKAGE TO THE COUNTY OF SAN DIEGO STRATEGIC PLAN

Today's proposed actions support the Community and Sustainability Strategic Initiatives of the County of San Diego's 2022-2027 Strategic Plan by strengthening the reliability of our roads and increasing the readiness of residents ahead of emergency evacuations, while avoiding environmentally sensitive areas.

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SOURCE PROCUREMENT (DISTRICTS: ALL)

Respectfully submitted,



FOR

HELEN N. ROBBINS-MEYER
Chief Administrative Officer

ATTACHMENT(S)

Attachment A – Notice of Exemption, Ascent Environmental CEQA Exemption Support Memorandum, Ascent Environmental Biological Resources Constraints Letter Report.