



22.0 WILDFIRE

22.1 Regulatory Setting

22.1.1 California Department of Parks and Recreation District Management Plan

22.1.1.1 Management Plan Section 0303.1.3.1.1: Planning

Section 0303.1.3.1.1 requires preparation of unit wildfire management plans and unit prescribed burn plans.

22.1.1.2 Management Plan Section 0131.2: Wildfire

Section 0131.2 states that wildland fire, whether human-caused or naturally ignited, may contribute to or hinder the achievement of Park management objectives. Therefore, Park fire management programs will be designed to meet Park resource management objectives while ensuring that firefighter and public safety are not compromised.

22.1.2 California Public Resources Code

22.1.2.1 Section 4290

California Public Resources Code (PRC) 4290 was adopted for establishing minimum wildfire protection standards in conjunction with building, construction, and development in State Responsibility Areas (SRAs). Under Section 4290, the future design and construction of structures, subdivisions, and developments in SRAs must provide for basic emergency access and perimeter wildfire protection measures as specified in Section 4290. These measures provide for road standards for emergency access, signing and building numbering, water supply reserves, and fuel breaks and greenbelts. Local standards that exceed those of Section 4290 supersede Section 4290.

22.1.2.2 Section 4291

PRC 4291 applies to a person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material. These regulations require maintaining defensible space no greater than 100 feet from each side of the structure determining the amount of fuel modification necessary to account for the flammability of the structure as affected by building material, building standards, location, and type of vegetation.

22.1.2.3 Section 4311

PRC Section 4311 prohibits lighting, building, or use of a fire within a Unit except in a camp stove or fireplace provided, maintained, or designated for such purpose. Portable camp stoves may be used in portions of Units approved by State Parks. Section 4311 further prohibits, upon a finding of extreme fire hazard by State Parks, smoking or building fires in portions of Units other than those designated by State Parks for such purposes.

22.1.2.4 Section 4442

PRC Section 4442 prohibits the use of internal combustion engines running on hydrocarbon fuels on any land covered by forest, brush, or grass unless the engine is equipped with a spark arrestor and is constructed, equipped, and maintained in good



working order when traveling on any such land. In addition, a spark arrester affixed to the exhaust system cannot be placed or mounted in such a manner as to allow flames or heat from the exhaust system to ignite flammable material.

22.1.3 Oceano Dunes District Order No. 544-008-2020

Oceano Dunes District Order No. 544-008-2020 provides the following provisions for lighting, building, or use of campfires:

- Campfires are prohibited north of Grand Avenue.
- Campfires are prohibited within fifty (50) feet of any restroom facility or picnic table.
- Campfires are permitted south of Grand Avenue and within Oceano Dunes SVRA.
- Campfires are permitted between the shoreline and beach, to the western edge of the foredunes. Campfires, including ground fires and warming fires, are prohibited within any vegetated dune areas including Pismo Dunes Natural Preserve and Oso Flaco Lake area.
- Only wood and untreated wood products, free of metal, petroleum products or other toxic substances shall be used for campfires, beach fires, or recreational fires.
- Campfires, beach fires, or recreational fires shall not be larger than three (3) feet in diameter and two (2) feet in height.
- No person shall import, transport, or possess any wood, plastic, or fiber pallet.
- No person shall ignite, burn, or maintain any wood, plastic, or fiber pallet fire.
- No person shall light, build, use or maintain a fire during the hours of 10:00 PM to 6:00 AM except in the open use portion of Oceano Dunes State Vehicular Recreation Area, south of beach marker post #2 and being registered and having camping fees paid.

22.2 Environmental Setting

22.2.1 California Department of Forestry and Fire Protection

The Oceano Dunes SRVA is within the California Department of Forestry and Fire Protection (CAL FIRE)/San Luis Obispo County Unit (CAL FIRE 2020). CAL FIRE provides staffing for the San Luis Obispo County Fire Department through a contract with San Luis Obispo County (San Luis Obispo County Fire Department 2020a).

Mesa Station 22, located at 2391 Willow Road in Arroyo Grande, is the nearest San Luis Obispo County Fire Department station to the Oceano Dunes SVRA and is the closest responding fire station for emergencies at the Park. Staffing at Mesa Station 22 includes one fire captain and one fire apparatus engineer. One, or both firefighters assigned to Medic Engine 22 is a licensed paramedic. Medic Engine 22 is supplemented by a 25-member paid call firefighter company (San Luis Obispo County Fire Department 2020b). Station 22 responded to 1,216 calls for service in 2019, of which 260 calls were to the Oceano Dunes SVRA (San Luis Obispo County Fire Department 2020c). CalFire may also respond to wildfire from other regional stations, including its station in Nipomo. The 5 Cities Fire authority may also respond to fires in Pismo State Beach properties.



22.2.2 Wildfire Classifications and Behavior

Fires are classified by where in the fuel strata they burn: surface fires, understory fires, and crown fires (California Forest Stewardship Program 2015). Surface fires are the most common. Depending on the fuels, weather, and topography, these fires can be low to high intensity. Understory fires have flame lengths up to 10 feet. They consume surface fuels, small trees, brush, and lower branches of overstory trees. Crown fires reach into the crowns of trees with flame lengths more than 10 feet.

Fire season is the period when fires are expected to occur, based on knowledge of long-term climate patterns. Wildland fire behavior is based on three primary factors: topography, weather, and fuels. The following discussion briefly describes how each of these factors influences wildfire behavior within the PWP planning area.

22.2.2.1 Topography

Topographic features such as slope and aspect influence a fire's intensity, direction, and rate of spread. Fires burning in flat or gently sloping areas tend to burn more slowly and spread in wider ellipses than fires on steep slopes. Streams, rivers, and canyons can channel local diurnal and general winds, which can accelerate the fire's speed and affect its direction, especially during foehn (warm, dry, and unusually strong) wind events (California Forest Stewardship Program 2015).

The Park is at a low elevation, ranging from about zero to 25 feet above mean sea level. The shoreline comprises flat, broad beaches backed by dunes with intersperse lakes, creeks, and wetlands. The tops of the dunes along the eastern side of the SVRA are approximately 190–200 feet above mean sea level.

22.2.2.2 Weather

Weather conditions influence the potential for fire ignition, rates of spread, intensity, and the direction(s) toward which a fire burns. Temperature, relative humidity, and wind are the variables used to predict fire behavior. These variables in the PWP planning area are influenced by the planning area's proximity to the Pacific Ocean and the Coast and Transverse ranges that trend in a general northwest-southeast and east-west orientation, respectively. The north Pacific high-pressure system, a semi-permanent area of high pressure centered over the north Pacific Ocean, pushes storms to the north during summer. During winter, the pressure center moves south, bringing rain and cooler temperatures.

Near the coast, the Pacific Ocean influence results in typically moderate temperatures year-round. Average maximum temperatures in the summer are typically in the 60s and 70s; average minimum temperatures in winter are typically in the 40s and 50s. Precipitation near the coast averages between 15 and 25 inches per year.

Oceano Dunes SVRA is situated in the Guadalupe-Nipomo Dunes Complex, an approximately 18,000-acre, 18-mile-long coastal dune landscape that contains large, vegetated and unvegetated sand dunes subject to strong prevailing winds. The dunes, including the area in which Oceano Dunes SVRA is located, are exposed to strong and frequent prevailing winds from the northwest (i.e., blowing towards the southeast), especially during the springtime (approximately March through June).



Fire potential in the PWP planning area is typically highest from June through September, when dry vegetation and low humidity are common.

22.2.2.3 Fuels

Vegetation usually provides most of the fuel that feeds wildfire. The volume, character, distribution, and arrangement of vegetation all greatly influence fire behavior (California Forest Stewardship Program 2015). Sand dunes, beaches, and agricultural fields maintained in irrigated crops are considered “non-burnable,” meaning little to no fuel load exists that could exacerbate spread wildfire (National Wildfire Coordinating Group 2015). The majority of fuels in the planning area are associated with Central Coast dune scrub habitat. Summertime fog is common in the Oceano Dunes SRVA and consistent fog has the potential to reduce plant flammability during the dry season and reduce fuel moisture loss rates (Emery et al. 2018).

See the PWP Volume 2 section 1.5 “Biological Resources,” for further discussion of habitat and vegetation types in the PWP planning area.

22.2.3 Fire Hazard Severity Zones

Fire prevention areas considered to be under state jurisdiction are referred to “state responsibility areas” or SRAs, and CAL FIRE is responsible for vegetation fires within SRA lands.¹ In general, SRA lands contain trees producing, or capable of producing, forest products; timber, brush, undergrowth, and grass, whether of commercial value or not, that provide watershed protection for irrigation or for domestic or industrial use; or lands in areas that are principally used, or are useful for, range or forage purposes.

Public Resources Code Sections 4201–4204 and Government Code Sections 51175–51189 require identification of fire hazard severity zones within the State of California. Fire hazard severity zones are measured qualitatively, based on vegetation, topography, weather, crown fire potential (a fire’s tendency to burn upward into trees and tall brush), and ember production and movement within the area in question. In SRAs, CAL FIRE is required to delineate three wildfire hazard ranges: moderate, high, and very high. As shown in Figures 23-1 and 23-2, most of the Oceano Dunes SVRA is in a SRA and designated by CAL FIRE as Moderate and High Fire Severity Zones (CAL FIRE 2007).²

CAL FIRE identifies only very high fire hazard severity zones in “local responsibility areas,” which are areas under the jurisdiction of local entities (e.g., cities and counties). There are no very high fire hazard severity zones in the PWP planning area (CAL FIRE 2009).

¹ California Public Resources Code (PRC) Sections 4125–4127 define a State Responsibility Area as lands in which the financial responsibility for preventing and suppressing wildland fire resides with the State of California.

² CAL FIRE’s Online Fire Hazard Severity Zone viewer was accessed on November 16, 2020, to confirm the hazard severity zone rating for the PWP planning area (<http://egis.fire.ca.gov/FHSZ/>).



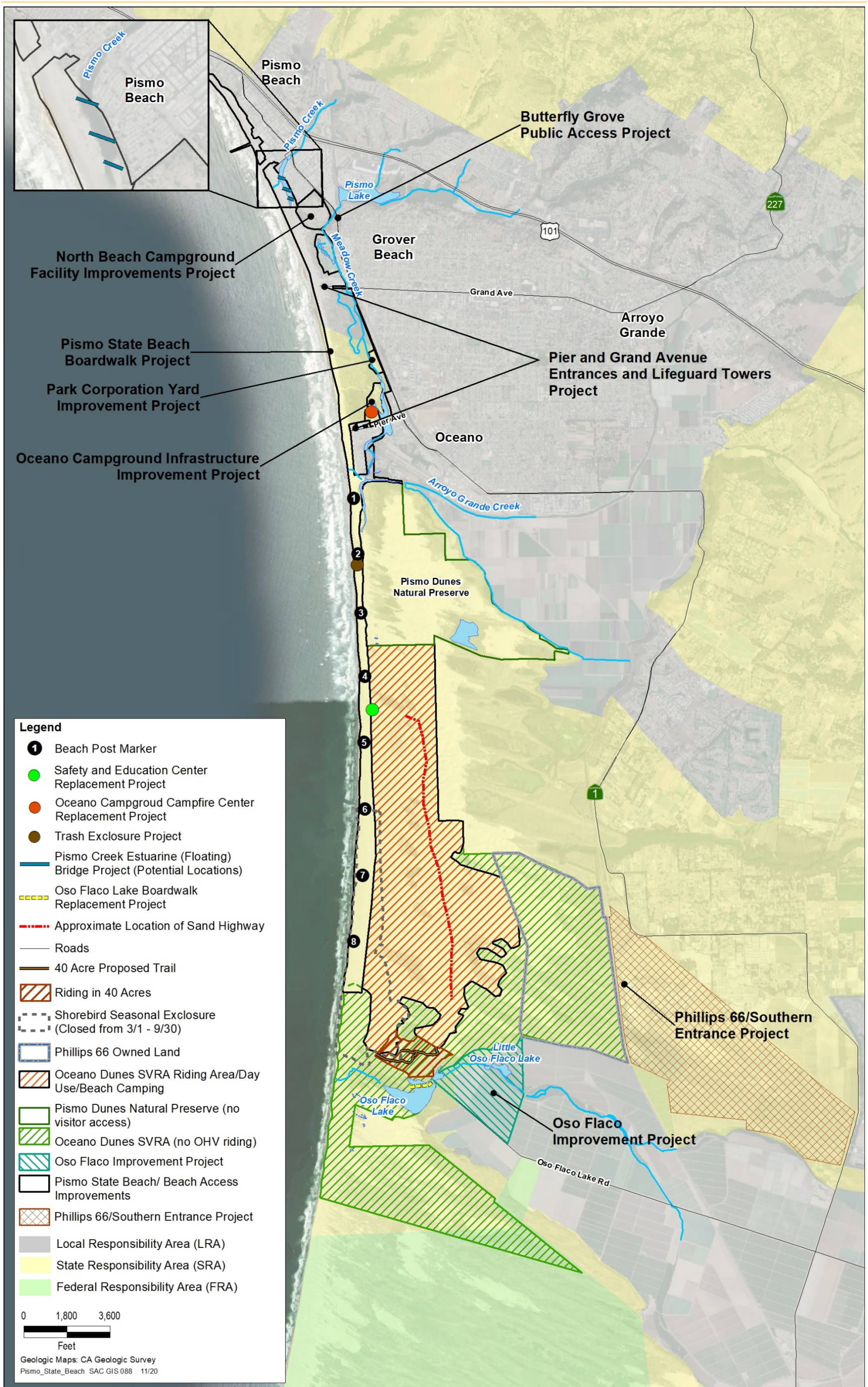


Figure 22-1. Local, State, and Federal Responsibility Areas

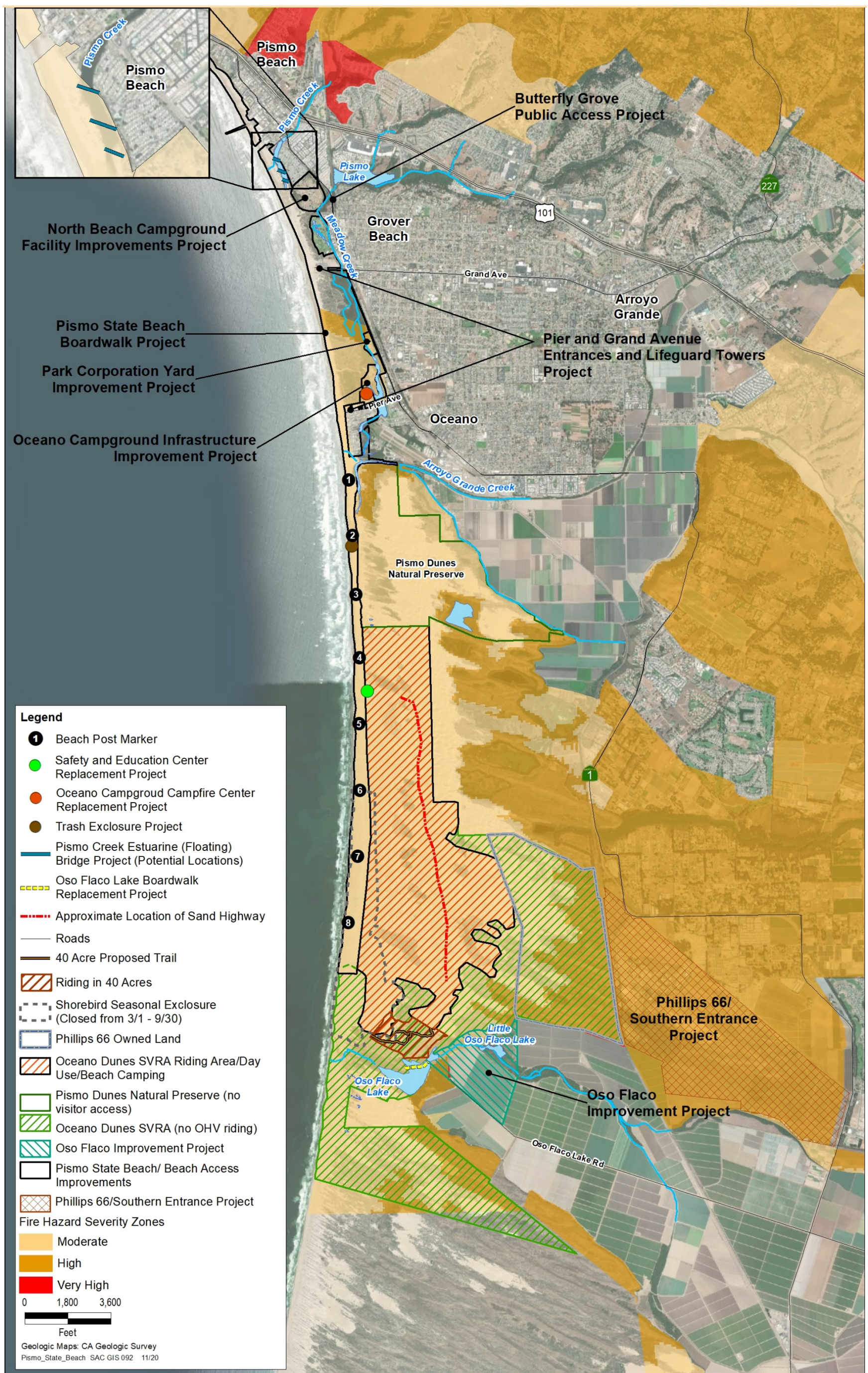


Figure 22-2. Fire Hazard Severity Zones

22.3 Project Impacts

Thresholds of Significance

Based on Appendix G of the CEQA Guidelines, the PWP would have a potentially significant impact related to wildfire if it would be located in or near state responsibility areas or lands classified as very high fire hazard severity zones and would:

- a) Substantially impair an adopted emergency response plan or emergency evacuation plan?
- b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

22.3.1 Impacts and Mitigation

Impacts associated with slope stability are evaluated in Chapter 10, “Geology, Soils, and Paleontological Resources,” and impacts associated with downstream runoff, flooding, and drainage changes are evaluated in Chapter 13, “Hydrology and Water Quality.” Impacts associated with impairment of an adopted emergency response plan or emergency evacuation plan are evaluated in Chapter 12, “Hazards and Hazardous Materials.”

Infrastructure that could exacerbate wildfire risks, in this case, refers to relocation and installation of utility infrastructure (i.e., water, wastewater, electrical, and telecommunications), and road improvements and maintenance. The potential for installation or maintenance of this infrastructure to result in temporary or ongoing impacts to the environment are addressed in the applicable resource sections throughout this EIR, including Chapter 10, “Geology, Soils, and Paleontological Resources,” Chapter 12, “Hazards and Hazardous Materials,” and Chapter 13, “Hydrology and Water Quality.”

22.3.1.1 Impacts from PWP Implementation

Operations and maintenance activities associated with implementation of the PWP include the use of heavy equipment (e.g., loader, tractor) in all areas of the Oceano Dunes District. Depending on the location of maintenance activities and equipment required, fire risks could result from vehicle mufflers, gasoline-powered tools, and other equipment could produce a spark, fire, or flame. State Parks would comply with all PCRs related to fire safety and wildfire suppression identified in Section 23.1, “Regulatory Setting,” above and discussed further below. Strict adherence to applicable PRCs requirements would ensure that wildfire risks are minimized. Therefore, impacts related to the potential for PWP implementation to exacerbate wildfire risks is **less than significant**.

22.3.1.2 Impacts from PWP Development Projects



Impact 23-1 Exacerbate Wildfire Risks

As stated above, Appendix G of the CEQA Guidelines determines wildfire impacts based on whether a proposed project would occur within or near a SRA or on lands classified as very high fire hazard severity zones. None of the site-specific improvement projects would be on lands classified as a very high fire hazard severity zone.

The following site-specific improvement projects are not within an SRA; therefore, **no impact** related to wildfire would occur:

- Pier and Grand Avenue Entrances and Lifeguard Towers Project;
- North Beach Campground Facility Improvement Project;
- Butterfly Grove Public Access Project.

The following site-specific improvement projects are within an SRA (Figure 23-1) and designated by CAL FIRE as Moderate Fire Severity Zones (Figure 23-2); however, the risk of wildfire is low and this impact would be **less than significant**:

- Oceano Campground Infrastructure Improvement Project. Construction efforts will be restricted to the currently developed campground footprint site.
- Pismo State Beach Boardwalk Project. The project will install a new 1.1-mile public access boardwalk south of the existing one that will run south along the foredunes between Grand and Pier Avenues. As discussed in Section 22.2.2.3, “Fuels,” sand dunes, which would include foredunes, are generally considered non-burnable.
- Park Corporation Yard Infrastructure Improvement Project. The corporation yard maintenance road would be located in an area densely vegetated with Central Coast dune scrub habitat and a small portion of riparian habitat. However, summertime fog is common in the Oceano Dunes SRVA and consistent fog has the potential to reduce plant flammability during the dry season and reduce fuel moisture loss rates thereby reducing wildfire hazards. State Parks would comply with all PRCs related to fire safety and wildfire suppression discussed below that would reduce the potential for wildfires to occur during development of the maintenance road.

Oso Flaco Improvement Project and Phillips 66/Southern Entrance Project

The western/northwestern portion of the Oso Flaco Improvement Project site and Phillips 66/Southern Entrance Project site are within an SRA (Figure 23-1). As shown on Figure 23-2, these project sites are designated by CAL FIRE as Moderate Fire Severity Zones and a portion of the Phillips 66/Southern Entrance Project site is designated as a High Fire Severity Zone. Currently, the Oso Flaco Improvement Project site is leased for agricultural uses and Phillips 66/Southern Entrance Project site is a mix of developed and undeveloped lands. With construction of the Oso Flaco Improvement Project and Phillips 66/Southern Entrance Project, a larger area would be available in which visitors could recreate, thereby increasing the potential for accidental fires and potentially increasing the number of people and structures that could be exposed to wildfire. Both projects propose RV, tent, and cabin camping and the Phillips 66/Southern Entrance Project proposes a multi-use event space and multiple OHV trails. In addition, the Oso Flaco Improvement Project would include a Park general purpose building, facilities and maintenance buildings, and an office for lifeguards and ranger.



Wildfire risks would be offset by State Parks compliance with fire safety and wildfire suppression measures identified in Section 23.1, “Regulatory Setting,” above. State Parks would prepare wildfire and prescribed burn management plans as well as implement additional Park fire management programs designed to meet Park resource management objectives while ensuring that firefighter and public safety are not compromised as required by the State Parks District Management Plan. Vehicles would be maintained in good working order and equipped with spark arrestors consistent with PRC 4442. All site-specific improvement projects within the SRA would provide minimum wildfire protection standards identified in PRC 4290, including providing adequate emergency access. In addition, visitors to the Oceano Dunes SRVA would be subject to the provisions identified in Oceano Dunes District Order 544-008-2020, which provides regulations for lighting, building, or use of campfires; and PRC 4311, which prohibits lighting, building, or use of a fire except in a camp stove or fireplace provided, maintained, or designated for such purpose. Adherence to these safety measures, when considered together, would minimize the risk of increased frequency, intensity, or size of wildfires and decrease the risk of exposure of people or structures to wildfire. Therefore, impacts related to the potential for the Oso Flaco Improvement Project and Phillips 66/Southern Entrance Project to exacerbate wildfire risks would be **less than significant**.

Mitigation Measures: No mitigation is required.

22.3.1.3 Small Development Projects

The following small development projects are not within an SRA; therefore, **no impact** related to wildfire would occur:

- Pismo Creek Estuary Seasonal (Floating) Bridge Installation;
- Safety and Education Center Replacement Project.

The following small development projects are within an SRA (Figure 23-1) and designated by CAL FIRE as Moderate Fire Severity Zones (Figure 23-2); however, these projects do not include any features that would exacerbate wildfire risks, and **no impact** would occur:

- Oceano Campground Campfire Center Replacement;
- Trash Enclosure Project at Post 2;
- 40 Acre Riding Trail Installation Project. The project would include establishment of riding trails in an area currently closed to motorized recreation. The 40 Acre Riding Trail Installation Project site would be located in sand dunes that do not include enough fuel to support wildfire spread and would be considered non-burnable (National Wildfire Coordinating Group 2015). Oso Flaco Boardwalk Replacement. The project would include replacement of the existing boardwalk.

22.4 Cumulative Effects

The Oceano Dunes SRVA is within the CAL FIRE/San Luis Obispo County Unit, and this unit provides wildfire response in all areas identified as a SRA within San Luis Obispo County (CAL FIRE 2020). CAL FIRE provides staffing for the San Luis Obispo County Fire Department through a contract with San Luis Obispo County. Future development of related projects within the CAL



FIRE/ San Luis Obispo County Unit SRA could exacerbate wildfire risks through construction of additional structures and increased public access to undeveloped areas.

As discussed in Impact 23-1, adherence to safety measures identified in the State Parks District Management Plan, PRC, and Oceano Dunes District Order 544-008-2020, when considered together, would minimize the risk of increased frequency, intensity, or size of wildfires and decrease the risk of exposure of people or structures to wildfire. Therefore, the PWP would result in a **less than significant cumulative** effects related to wildfire risks.

