
**The Race of Gentlemen Special Event
Pismo State Beach
Initial Study/
Negative Declaration**

September 2016



**State of California
Department of Parks and Recreation,
Off-Highway Motor Vehicle Recreation Division**

The Race of Gentlemen Special Event
Pismo State Beach
Initial Study/
Negative Declaration

September 2016



Prepared for:

State of California, Department of Parks and Recreation
Off-Highway Motor Vehicle Recreation Division

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NEGATIVE DECLARATION

Project: The Race of Gentlemen Special Event

Lead Agency: California Department of Parks and Recreation (CDPR), Off-Highway Motor Vehicle Recreation (OHMVR) Division

Availability of Documents: The Initial Study for this Negative Declaration is available for review at:

- Oceano Dunes District Office
340 James Way, Ste. 270
Pismo Beach, CA 93449
(805) 773-7170
Contact – Dena Bellman
- CDPR, OHMVR Division
1725 23rd Street, Suite 200
Sacramento, CA 95816
(916) 445-9152
Contact – Ryan Miller

PROJECT DESCRIPTION:

The OHMVR Division is evaluating the potential environmental effects of permitting The Race of Gentlemen Special Event proposed to be held at Pismo State Beach.

Event sponsors have applied for a Special Event Permit to hold The Race of Gentlemen at Pismo State Beach. The event comprises a Friday night welcome gathering at the North Beach Campground (October 14, 6 p.m. to 10 p.m.), a weekend vintage car display named “Customs by the Sea” at the Grand Avenue lot (October 15-16, 8:00 a.m. to 5:00 p.m.), weekend races of pre-World War II vehicles and antique motorcycles on hard sand at Pismo State Beach (October 15-16, 10:30 a.m. to 6:00 p.m.), and a Saturday beach party and bonfire (October 15, 6 p.m. to 10 p.m.). Race times will be flexible with incoming tide.

A vehicle race comprises two vehicles racing on a short (660 feet) stretch of beach located immediately south of the Grand Avenue beach entrance. Cars and motorcycles would cross the finish line with an average maximum speed of 35 miles per hour (mph). CDPR staff or the event sponsor may shorten the course to reduce speeds if deemed necessary for public safety, resource protection, or other operational considerations. Up to 120 vehicles may participate in the race with each race winner qualifying for the next round of competition. Races will occur for multiple vehicle classes. Event participation is by invitation only. Race vehicles are pre-selected through an application process. Participant vehicles would go through a technical inspection by designated qualified event staff. The event staff, drivers, and monitors would all have radio communications for the go/no go signal to proceed, as well as a flagman for a visual signal of go/no go. Spectators would be kept a minimum of 20 feet from the course by solid roadway delineators lined with fencing to establish the boundary of the vehicle race area. Multiple bleachers would be set up for spectator viewing. The event area would include an event stage, vendor area, restrooms, vendor parking, and a vehicle technical inspection area.

Participants will be camping at North Beach Campground. All vehicles would be subject to the same sound restrictions and equipment requirements applicable to all State Beach visitors. All safety and resource-protective measures in effect at the State Beach would apply to event participants. The 15 mph vehicle speed limit on the beach would remain in effect for all areas of the beach except for the 660-foot race strip located immediately in front of the fenced event spectator area. All pre-existing Oceano Dunes State Vehicular Recreation Area (SVRA) camping and vehicle limits would remain in effect during the event.

All event activities would be held in areas of the State Beach that are normally open to motorized vehicles and would not create effects beyond the areas open to motor vehicles and other recreation.

PROPOSED FINDING

The OHMVR Division has reviewed the Initial Study and determined there is no substantial evidence that the project may have a significant effect on the environment. No changes to the project plans or mitigation measures are required. Pursuant to CEQA Guidelines Sections 15064(f)(3) and 15070(a), a Negative Declaration has been prepared for consideration as the appropriate CEQA document for the project.

BASIS OF FINDING

Based on the environmental evaluation presented in the attached Initial Study, the project would not cause significant adverse effects related to aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, and utilities/service systems. In addition, substantial adverse effects on humans, either direct or indirect, would not occur. The project does not affect any important examples of the major periods of California prehistory or history. Nor will the project substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. The project does not have impacts that are individually limited, but cumulatively considerable.

RECORD OF PROCEEDINGS AND CUSTODIAN OF DOCUMENTS

The record, upon which all findings and determinations related to the approval of the project are based, includes the following:

1. The Negative Declaration and all documents referenced in or relied upon by the Negative Declaration.
2. All information (including written evidence and testimony) provided by OHMVR Division staff to the decision maker(s) relating to the Negative Declaration, the approvals, and the project.
3. All information (including written evidence and testimony) presented to the OHMVR Division by the environmental consultant who prepared the Negative Declaration or incorporated into reports presented to the OHMVR Division.
4. All information (including written evidence and testimony) presented to the OHMVR Division from other public agencies and members of the public related to the project or the Negative Declaration.
5. All applications, letters, testimony, and presentations relating to the project.
6. All other documents composing the record pursuant to Public Resources Code section 21167.6(e).

The OHMVR Division is the custodian of the documents and other materials that constitute the record of the proceedings upon which the OHMVR Division's decisions are based. The contact for this material is:

Ms. Dena Bellman
Oceano Dunes District Office
340 James Way, Suite 270

Pismo Beach, CA 93449
(805) 773-7170

Pursuant to section 21082.1 of the California Environmental Quality Act, the OHMVR Division has independently reviewed and analyzed the IS/ND for the proposed project and finds these documents reflect the independent judgment of the OHMVR Division.

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**Pismo State Beach
The Race of Gentlemen Special Event Initial Study**

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Chapter 1 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

This Initial Study has been prepared by the Off-Highway Motor Vehicle Recreation (OHMVR) Division of the California Department of Parks and Recreation (CDPR). This Initial Study evaluates the potential environmental effects of permitting The Race of Gentlemen Special Event, proposed for October 14-16, 2016, in Pismo State Beach. The Race of Gentlemen comprises a race of pre-World War II vehicles and antique motorcycles on hard sand for a distance of 660 feet. The race would occur within the area of Pismo State Beach open to street legal vehicles. The entire event includes a Friday night welcome gathering, weekend races and vintage car display, and a Saturday night beach party and bonfire.

The California Environmental Quality Act (CEQA; Public Resources Code § 21000 et seq.) and the CEQA Guidelines (14 CCR §15000 et seq.) establish the OHMVR Division as the lead agency. The lead agency is defined in CEQA Guidelines Section 15367 as “the public agency which has the principal responsibility for carrying out or approving a project.” The lead agency decides whether an Environmental Impact Report (EIR) or Negative Declaration is required for the project and is responsible for preparing the appropriate environmental review document.

According to CEQA Guidelines Section 15070, a public agency shall prepare a proposed Negative Declaration or a Mitigated Negative Declaration when:

1. The Initial Study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or
2. The Initial Study identifies potentially significant effects, but:
 - Revisions in the project plans made before a proposed Mitigated Negative Declaration and Initial Study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and
 - There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

Pursuant to Section 15070, the OHMVR Division has determined a Negative Declaration is the appropriate environmental review document for The Race of Gentlemen Special Event.

1.2 LEAD AGENCY CONTACT INFORMATION

The lead agency for the proposed project is the OHMVR Division. The contact person for the lead agency is:

Dena Bellman
Oceano Dunes District Office
340 James Way, Ste. 270
Pismo Beach, CA 93449
(805) 773-7170
Dena.Bellman@parks.ca.gov

1.3 DOCUMENT PURPOSE AND ORGANIZATION

The purpose of this document is to evaluate the potential environmental effects of The Race of Gentlemen proposed to be held at Pismo State Beach. This document is organized as follows:

- Chapter 1 – Introduction. This chapter provides an introduction to the project and describes the purpose and organization of this document.
- Chapter 2 – Project Description. This chapter describes the project location, area, site, objectives, and characteristics.

- Chapter 3 – Environmental Checklist and Responses. This chapter contains the Environmental Checklist, which identifies the significance of potential environmental impacts (by environmental issue). It includes a brief discussion of each impact resulting from implementation of the proposed project and the information sources used in the analysis. This chapter also contains the Mandatory Findings of Significance.
- Chapter 4 – Report Preparation. This chapter provides a list of those involved in the preparation of this document.

1.4 REQUIRED PERMITS AND APPROVALS

The following permits or approvals are required for this project:

- CDPR Special Event Permit
- California Department of Transportation (Caltrans) Encroachment Permit
- City of Grover Beach Encroachment Permit
- County of San Luis Obispo Encroachment Permit

Chapter 2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND SITE DESCRIPTION

The OHMVR Division proposes to issue a Special Event Permit for The Race of Gentlemen at Pismo State Beach in the community of Grover, San Luis Obispo County, California (Figure 1). Pismo State Beach and Oceano Dunes State Vehicular Recreation Area (SVRA) located immediately south of Pismo State Beach, contain 5½ miles of beach open for vehicle use, which attracts visitors from throughout the United States.

Street-legal vehicle access to Pismo State Beach is available from Grand Avenue in Grover Beach and from Pier Avenue, which is south of Grand Avenue. The Race of Gentlemen beach event area would occur immediately south of the Grand Avenue beach entrance (Figure 2). Overnight camping by event participants would occur at the North Beach Campground (Figure 2).

2.2 PROJECT OBJECTIVES

The Race of Gentlemen is an exhibition of restored pre-World War II cars and antique motorcycles through beach races and display. The purpose of the Special Event Permit is to formalize the event to create a safe environment for participants and spectators and ensure adequate environmental review.

2.3 PROJECT CHARACTERISTICS

2.3.1 Event Activities

Welcome and Opening Events

The event organizers propose to reserve the entire Pismo State Beach North Beach Campground October 13-16, 2016 to offer these camping spots to the participants of the event. All 103 campground spaces would be closed to the public.

Event sponsors would host a Friday night welcome gathering at the North Beach Campground from 6:00 p.m. to 10:00 p.m. The public would be allowed free walk-in entry to view the historic trailers, cars, and motorcycles displayed by the owners at each of their campsites. The Friday night welcome would provide amplified period music and offer a BBQ and beverage vendor.

Beach Race Festival

The proposed race would consist of two vehicles driving from the start point at the northern end of the event area for a distance of approximately 660 feet along the hard sand of the beach. The average maximum speed of these pre-World War II vehicles and antique motorcycles would be 35 miles per hour (mph) as they cross the finish line. Maximum speed would vary based on vehicle class with some vehicles performing slower and others going faster. C DPR staff or the event sponsor may shorten the course to reduce speeds if deemed necessary for public safety, resource protection, or other operational considerations per permit conditions (Section 2.5). The vintage cars and motorcycles are hand-selected for the exhibitions by the event's founders, and must be built using pre-WWII chassis and engines, as well as period-correct, hand-fabricated parts. The vehicles chosen to participate in this portion of the event are individually selected by the promoter's technical team and are required to go through a technical evaluation for both safety and authenticity to period.

The event area would be located on the stretch of Pismo State Beach south of the Grand Avenue entrance to the park (Figure 2). The event area would measure up to 1,500 feet in length to accommodate the race distance, room for race vehicles to turn around after the finish line, and staging area for event staff, emergency responders, and park resource monitors. The northern, eastern, and southern ends of the event area would have boundaries delineated by temporary chain-link fencing. The northern border delineation would have signage allowing

vehicle use to the south and non-vehicle use to the north. K-rails filled with sea water would delineate the race track from the event area. Beach wind fencing would be placed along the east side of the k-rails.

The event area would cover the entire depth of the beach with the races occurring on the hard pack sand. The event area would be set up with bleachers (10 feet tall), tents, vendor spaces for food and merchandise, a stage for live music, a vintage trailer serving as the event office, an elevated platform for the announcer, small VIP towers, and a large wood-fueled bonfire (Figure 2). The bonfire would be established and monitored by the Five Cities Fire Department staff with a fire truck and hose lines laid as deemed necessary by the fire department. CDPR would require appropriate licensing, permits, and insurance from any food vendor/caterer operating at the event. An amplified sound system would be set up to announce the races.

The event area would open to the public at 10:00 a.m. Participant vehicles may enter the park as early as 8:00 a.m. to enter the north end of the event area. Races would occur between 10:30 a.m. and 6:00 p.m. on Saturday and Sunday, October 15 and 16, 2016. Start and end times of the races would depend upon the tide. A party and bonfire is proposed on Saturday, October 15 between 6:00 p.m. and 10:00 p.m.

An event admission area would be set up at the west end of Grand Avenue east of the Grand Avenue entry kiosk on Grand Avenue, and west of the driveway into the Grand Avenue parking lot to allow the same-day purchase of event tickets. All event participants would be camping at North Beach campground and would enter the event area at Grand Avenue. Spectators could include paid camping or day use visitors entering from Pier Avenue; all spectators would pay an event entry fee at the event gates. There would be no drive-in spectators. Day-use vehicles entering the beach from Pier Avenue and driving north would be blocked approximately 100 feet south of the event area. The event sponsor would staff an admission area on the south end of the event area for those driving to that side.

Up to 120 cars and motorcycles would participate in the beach race; there would be approximately 80 cars and 40 motorcycles. Each race consists of two vehicles, with the majority of the racing both days being fun races where the participants choose to race each other for bragging rights. Approximately one-third of the race day on Sunday is single elimination racing where participants sign up to be included. Single elimination has five classes based on age of vehicle and size of engine; three classes for cars and two classes for motorcycles. Winners receive a felt banner and bragging rights; there are no monetary or incentive prizes.

Vintage Car Display

The special event includes a “Show and Shine” type exhibition called “Customs by the Sea” located at the Grand Avenue dirt lot (Figure 2). This area would be rented to the event promoters to allow the display of the vintage and pre-World War II vehicles. These would predominantly be vehicles that have not been selected to participate in the race, but are still authentic to the period as well as other vintage cars. Being allowed to park in this prime location encourages vintage car owners to drive their vehicles and add ambiance and authenticity to the event. The Show and Shine exhibition would occur on both Saturday and Sunday from 8:00 a.m. to 5:00 p.m.

2.3.2 Beach Access

The Grand Avenue vehicle ramp access to Pismo State Beach would not be available to the public to drive on during set up and during the event. Visitors wanting vehicle day use access to the beach would be directed to the Pier Avenue ramp one mile south of Grand Avenue. Walk-in visitors to Pismo State Beach would have beach access from Grand Avenue to the north, through the overlook entry and the boardwalk.

All event tickets may be pre-purchased through the event sponsor, which would be responsible for managing event entry. Same day tickets may also be purchased online or at an information and sales booth set up at the west end of Grand Avenue east of the kiosk and at the southern end of the event area on the beach. There would be no event gate sales at kiosk entry points (Grand Avenue and Pier Avenue).

Non-event beach access for vehicles would remain available at the Pier Avenue beach entrance. Pedestrian and equestrian access to the beach would remain open and accessible outside of the event parameters.

2.3.3 Race Event Attendance

Event organizers anticipate up to 8,000 spectators based on experience of past events in Wildwood, New Jersey. An estimated 2,000 passenger vehicles from event spectators would require parking either in campgrounds, local accommodations, street lots along Grand Avenue, or directly on the beach as accessed from Pier Avenue (due to the Grand Avenue beach ramp closure). The dirt lot at Grand Avenue as well as available lots up Grand Avenue would be leased for parking for the weekend and managed by event volunteers. Proposed event parking lots are within walking distance to the park. The dirt lot at Grand Avenue accommodates 400 vehicles.

All Visitor Use Limits established by the park's existing Coastal Development Permit Amendment (CDP 4-82-300-A5) would remain in effect during this event. Day use street-legal vehicles are limited to 2,580. Neither the CDP nor Pismo State Beach operating rules limit the number of pedestrian visitors. The number of event tickets sold would be based on the fire marshal evaluation of the event area set up. If the fire marshal sets a limit, the promoters would abide that.

Special event signage would be posted as far out as U.S. 101 to direct spectators to the event area parking. Signage language and placement along State Route 1 would be determined based on requirements from the California Department of Transportation (CalTrans).

2.3.4 Safety Measures

Prior to the beach race, the participating vehicles would go through a technical inspection by designated qualified event staff. The technical inspection requirements are listed in Appendix A. The course would consist of a defined course on hard sand with a start and finish line marked by pylons (Figure 2). The event staff, drivers, and park monitors would all have radio communications for the go/no go signal to proceed, as well as flagmen for a visual signal of go/no go.

Spectators would be kept a minimum of 20 feet from the east side of the race course by solid roadway K-rail type delineators lined with taller temporary fencing. Bleachers would be provided to accommodate the spectators and provide safe distance viewing.

All vehicles would be subject to the same sound restrictions and equipment requirements applicable to all State Beach visitors. All safety and resource-protective measures in effect at the State Beach would apply to event participants. The 15 mph vehicle speed limit on the beach would remain in effect for all areas of the beach except for the race course beach strip located immediately in front of the event spectator area (Figure 2).

All routine and emergency protocols would remain in place during the event.

Vehicle towing services would be provided onsite at the south end of the event.

2.3.5 Traffic Controls and Signage

Event organizers propose the following traffic control plan to direct event spectators to event parking, ticketing, and beach entrance. Temporary signage would direct visitors to parking and

beach entrance areas and to alert them to road closures as shown in Table 1. Signage would also be erected seven days prior to the event to provide motorists advance notice of the upcoming event.

Parking

Off-site parking for event guests with vintage vehicles has been designated on the dirt lot on Grand Avenue. The adjacent paved parking lot would be reserved for non-vintage motorists. Beach parking for vehicles with 4-wheel drive has been designated on the south side of the event area with access from Pier Avenue (Figure 2). Street parking would be available on State Route 1 north of Grand Avenue and parking in residential areas would be available as approved by the City of Grover Beach. Several private lots would be available off of Grand Avenue.

Traffic Flow

Westbound Traffic: Event traffic would use W. Grand Avenue and Pier Avenue as the two entrances into the event. Grand Avenue would serve as the primary entrance. Approximately five hundred feet west of State Route 1, the two westbound traffic lanes of Grand Avenue would be merged into a single lane. The northernmost lane (Lane 1) would be closed to extend the sidewalk by providing a pedestrian walkway for foot traffic. The center lane (Lane 2) would direct the westbound traffic to the dirt lot and paved parking areas, and the southern lane (Lane 3) would be a clear traffic lane remaining open and available for production vehicles, public safety, and emergency medical personnel. Grand Avenue would be closed to all traffic immediately after the Fin's restaurant parking lot.

Flaggers would be positioned on W. Grand Avenue at the intersection of State Route 1, as well as at the entrance to both the dirt and paved parking lots. As motorists make their way west on Grand Avenue, a flagger would direct vintage vehicles into the first dirt lot driveway for vintage vehicle parking. A second flagger would be positioned at the sidewalk and pedestrian lane to ensure safe crossing. Non-vintage motorists would continue west on Grand Avenue and turn into the paved parking lot.

Once in the driveway, motorists would have one direct traffic flow lane through the parking lot and onto Le Sage Drive where they would make their way back to State Route 1 and to alternative parking options.

Rideshare Services Pick-up and Drop-off: All rideshare services and all pick-up/ drop-off traffic would be directed down Le Sage Drive where they would remain straight and flow into the rideshare parking lot. A limited number of vehicles would be permitted to stay in the parking lot before continuing with the flow of traffic around the parking lot and merging with the westbound traffic lane back onto Le Sage Drive toward State Route 1. The event organizers would provide outreach to the rideshare companies addressing the proposed loading/offloading plan for this event. Rideshare transportation would be promoted in event social media.

Fin's Traffic: All Fin's patrons would head down Le Sage Drive and into the Fin's parking lot.

Event Exit: At the end of the event, pedestrians would utilize the pedestrian lane and sidewalk up Grand Avenue. Cars parked in the dirt and paved parking lots would be directed out towards Le Sage Drive and Grand Avenue with flaggers controlling traffic and pedestrian crossing. Local officers would be placed at the intersections of State Route 1/Grand Avenue, State Route 1/Le Sage Drive, and State Route 1/Pier Avenue to help direct traffic flow.

The following specific measures would be implemented to control traffic flow and minimize traffic impacts:

1. Changeable Message Signs would be placed on State Route 1 to alert the public one week in advance of potential delays and street closures due to the event on October 15th and 16th.

2. Grover Beach Police and local CHP would control traffic at the intersections of Grand Avenue/State Route 1, La Sage Drive/State Route 1, and Pier Avenue/State Route 1 to ensure traffic flow remains safe and orderly.
3. A local towing service is retained on contract to facilitate timely removal of broken down vehicles and illegal parking.
4. A traffic management company is retained to provide sign installation, lane closure, and detours.
5. A pedestrian detour plan would be properly marked with signage for pedestrians walking north or south on the beach.

Table 1. Race of Gentlemen Event Signage	
Sign Location	Sign Text
Post Mounted Signs seven days prior to event (October 7, 2016)	
Southbound on State Route 1 north of Grand Avenue	Upcoming Road Closure at Grand October 15th & 16th. No beach access.
Northbound On State Route 1 south of Pier Avenue	Upcoming Road Closure at Grand October 15th & 16th. For beach access use Pier Avenue.
Changeable Message Signs day of event	
Grand Avenue and 4th Street	Event Parking for 4-wheel drive vehicles enter at Pier Avenue Event Entrance off of Pier Avenue and Grand Avenue Grand is closed; Use Pier Avenue for beach access
Grand Avenue right before the Railroad	No vehicle access ahead Grand Avenue closed ahead
On State Route 1 north of Grand Avenue	Road Closure west of State Route 1 on Grand Avenue
On State Route 1 south of Pier Avenue	Beach Event Parking enter at Pier Avenue for 4-Wheel Drive Vehicles
Southbound Highway 101	Event October 15&16. Exit 4th Street
Northbound Highway 101	Event October 15&16. Exit 4th Street
Grand Avenue and State Route 1 (On both sides of W. Grand Ave)	Road Closure Ahead; Event Pedestrian Access Only
Le Sage Drive at Park Lane (On both sides of Le Sage)	No through traffic
Grand and Pier Avenues	Event Access

2.4 EVENT STAFFING

Oceano Dunes District staff would be present during the Race of Gentlemen event to provide monitoring and compliance as outlined in the Special Event Permit conditions (Section 2.5). Staff would include personnel from all core program areas as shown below in Table 2. Administrative staff and park aids would monitor for compliance with the Special Event Permit Conditions. Resource staff would monitor and report on any special event activity interfacing with park resources in a way that needs to be modified or is inappropriate. Maintenance staff would provide additional support as needed to address unintended results of non-compliant event activity. Ranger staff would monitor the event for permit compliance in conjunction with the Administrative staff to enforce and address potential violations of California law, monitor

traffic impacts and institute traffic controls as necessary for compliance with the Special Event Permit conditions, and maintain and provide for public safety.

Oceano Dunes District Staff	Friday, Oct 14	Saturday, Oct 15	Sunday, Oct 16
Law Enforcement	Two 10-hour shifts	Four 10-hour shifts	Four 10-hour shifts
Park Aids	Two 8-hour shifts	Four 8-hour shifts	Four 8-hour shifts
Life Guards		Two 10-hour shifts	Two 10-hour shifts
Maintenance	Two 8-hour shifts	Two 8-hour shifts	Two 8-hour shifts
Administration	One 8-hour shift	One 8-hour shift	One 8-hour shift
Resources	Two 8-hour shifts	Two 8-hour shifts	Two 8-hour shifts

2.5 SPECIAL EVENT PERMIT CONDITIONS

CDPR has developed a standard set of Special Event Permit terms and conditions for special events (Appendix A). The OHMVR Division has determined that the following additional conditions specific to the event are required:

Race of Gentlemen Conditions:

1. All rules, regulations and policies apply.
2. Permittee or vendors must have proper license and permit to sell, including sales or distribution of food and/or alcohol.
3. Event parking must be located off-site with transportation plan.
4. All vendors and musicians subject to approval by the State.
5. All event marketing subject to approval by State; including web-site, required education materials, event directions and parking.
6. Event vendors, musicians, and staff will have pre-determined passes and allowed to arrive and set up during specific times established in Schedule of Events.
7. Permittee required to employ a zero waste vendor for trash collection and disposal.
8. Vendors may not use Styrofoam products.
9. Vendors providing sales of service or product are required to pay State a \$100.00 vendor fee. This fee is payable one (1) week prior to event.
10. Permittee may not mechanically alter the beach.
11. The race course will be monitored by State; Monitors will be in direct contact with race officials for go/no go; Race will be temporarily delayed if shorebirds are present.
12. CDPR staff or the event sponsor may shorten the course to reduce speeds if deemed necessary for public safety, resource protection, or other operational considerations.
13. The sea water intake for the k-rails shall have a filter that excludes intake of fish.
14. Permittee must assure there are vehicle leak inspections prior to beach entry and spill prevention measures in force on the beach; no refueling allowed on beach.
15. Submit and receive approval from State on Planning and Permitting Requirements (attached).
16. Permittee and all vendors must provide proof of insurance.

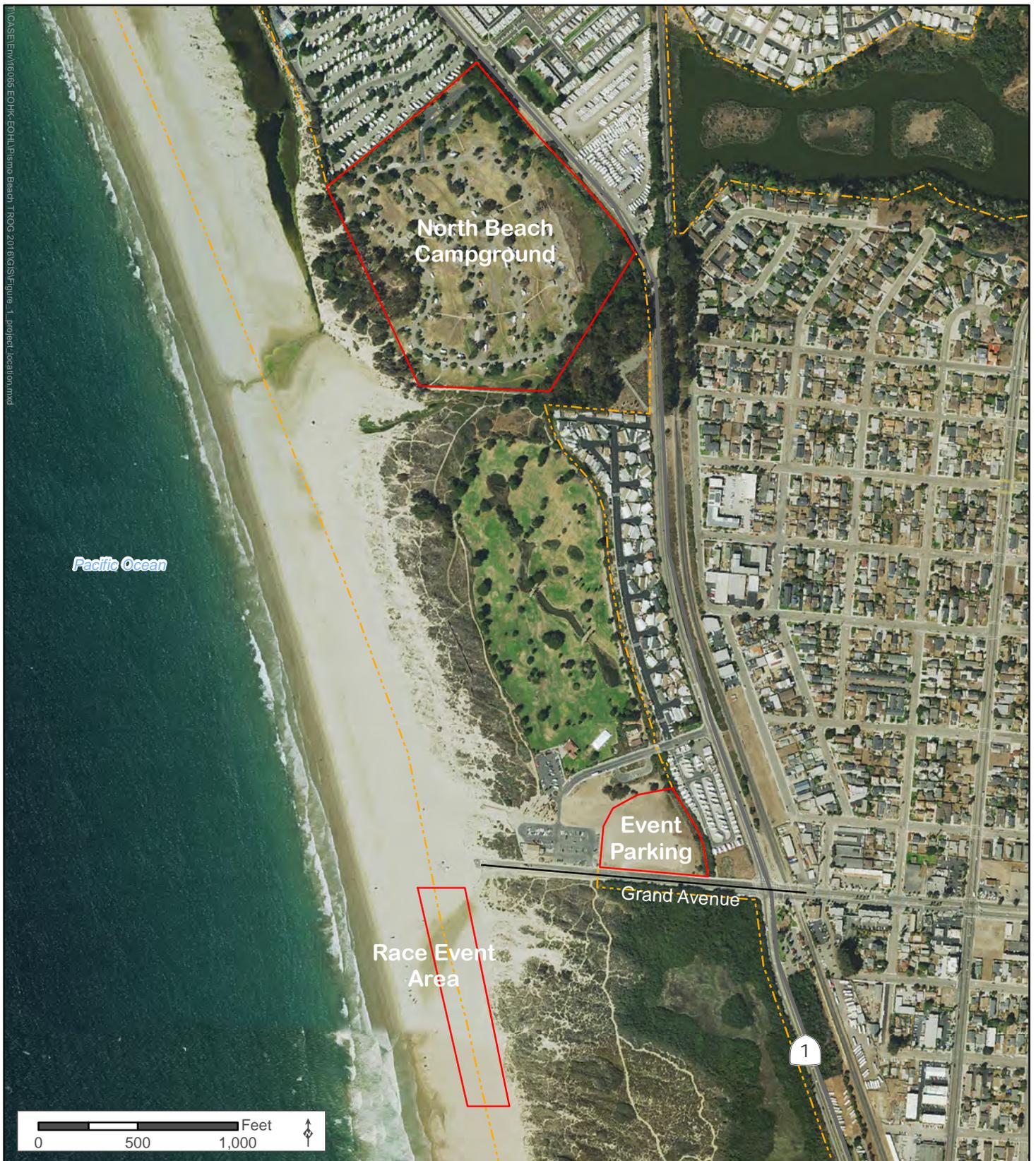


Figure 1 Project Location

The Race of Gentlemen Initial Study





Figure 2 Event Site

The Race of Gentlemen Initial Study

Chapter 3 ENVIRONMENTAL CHECKLIST AND RESPONSES

PROJECT INFORMATION

1. **Project Title:** The Race of Gentlemen Special Event
2. **Lead Agency Name and Address:** C DPR, OHMVR Division
1725 23rd Street, Suite 200
Sacramento, CA 95816
3. **Contact Person and Phone Number:** Dena Bellman, (805) 773-7170
Associate Park & Recreation Specialist
California State Parks, Oceano Dunes District
4. **Project Location:** Pismo State Beach
5. **Project Sponsor’s Name and Address:** The Race of Gentlemen
Bobby Green, (310) 490-2790
3720 Canyon Crest Road, Alta Dena, CA 91001
6. **General Plan Designation:** Property is a state park owned by the state government. Local general plan designations do not apply to state properties.
7. **Zoning:** Property is a state park owned by the state government. Local zoning designations do not apply to state properties.
8. **Description of the Project:** Project is a weekend special event involving beach races of pre-World War II vintage automobiles and motorcycles. See Chapter 2 for full description.
9. **Surrounding Land Uses and Setting:** The project would take place on a state beach. Surrounding lands include the beach shoreline and sand dunes, campgrounds, a golf course, restaurant, beach overlook, parking, and the adjacent developed community of Grover Beach.
10. **Other Public Agencies Whose Approval is Required:** California Department of Transportation (Caltrans) Encroachment Permit for signage on State Route 1; City of Grover Beach Encroachment Permit for signage on Grand Avenue; San Luis Obispo County Encroachment Permit for signage on Pier Avenue. Approval by California Highway Patrol is to be determined for CHP staffing at State Route 1 and Pier Avenue intersection.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Population/Housing
<input type="checkbox"/>	Agricultural and Forestry Resources	<input type="checkbox"/>	Hazards and Hazardous Materials	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Air Quality	<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Recreation
<input type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Transportation/Traffic
<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Utilities/Service Systems
<input type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Noise	<input checked="" type="checkbox"/>	Mandatory Findings of Significance
<input checked="" type="checkbox"/>	None				

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION would be prepared.
- I find that although the proposed project could have a significant effect on the environment, there would not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION would be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a potentially significant impacts or potentially significant unless mitigated@ impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Off-Highway Motor Vehicle Recreation Division

Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or

- more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in 5. below, may be cross-referenced).
 5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration (Section 15063(c)(3)(D)). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 7. Supporting Information Sources. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 8. Explanation(s) of each issue should identify:
 - a) The criteria or threshold, if any, used to evaluate the significance of the impact addressed by each question; and
 - b) The mitigation measures, if any, prescribed to reduce the impact below the level of significance.

3.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.1.1 Environmental Setting

The proposed special event would occur at Pismo State Beach, south of Grand Avenue, which is open to street-legal vehicles (Figure 2). This stretch of beach is visible from adjacent areas within Pismo State Beach from the western terminus of Grand Avenue.

State Route 1 in the project area is eligible for state scenic highway status. However, none of the highway segments that are located in the project area (State Route 1 and U.S. 101) are officially designated as state scenic highways. State Route 1 becomes a state scenic highway north of the city of San Luis Obispo, about 14 miles north of the project site.

3.1.2 Discussion

Would the proposed project:

- a. **Have a substantial adverse effect on a scenic vista?**
- b. **Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**
- c. **Substantially degrade the existing visual character or quality of the site and its surroundings?**
- d. **Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

No Impact (Responses a – d). The proposed special event would take place within an area that has been subject to ongoing motorized activities, including large gatherings of vehicles, since the 1900s. The event would not result in additional street-legal vehicles or OHVs within Pismo State Beach since vehicle use limits would remain in effect for the event. The event would not result in new trails or roads; all activities would take place in the designated riding area for street-legal vehicles. The event site does not contain scenic resources such as trees, rock outcroppings, or historic buildings within view of a state scenic highway. None of the stretches of the highways located in the area (State Route 1 and U.S. 101) have state scenic highway status. State Route 1 becomes a state scenic highway north of the city of San Luis Obispo, about 14 miles north of the project site. The project site is not visible from the state scenic designated portion of State Route 1. There would be no new sources of substantial light or glare as a result of this project. Since no new trails, roads, or any other type of development would

occur, and the activities proposed are already occurring or entirely consistent with activities already occurring within the event area, no scenic vistas would be adversely affected.

Sources:

California Department of Transportation. 2016. California Scenic Highway Mapping System. Officially Designated Scenic Highway Routes. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm. Accessed August 11, 2016.

3.2 AGRICULTURAL AND FORESTRY RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project*:</i>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
*In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				

3.2.1 Environmental Setting

The project area is located within a state beach. No farmland, forest, or timberland exists in the project area.

3.2.2 Discussion

Would the proposed project:

- a. **Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
- b. **Conflict with existing zoning for agricultural use, or a Williamson Act contract?**
- c. **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public**

Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- d. Result in the loss of forest land or conversion of forest land to non-forest use?**
- e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No Impact (Responses a – e). The project area is located within a designated state beach. No farmland, forest, or timberland exists on the event site, and adjacent farmland, forest, or timberland would not be affected (Figure 1). The project site is zoned as park land in the San Luis Obispo County General Plan. The proposed project would not remove any acreage from agricultural production. The project would have no impact on prime farmland or other agricultural resources in the project vicinity. The project would not affect any land that has been zoned for agricultural use or is currently in Williamson Act contracts; nor would this project conflict with any land that has been zoned as forest land, timberland, or timberland zoned Timberland Production. The project does not involve other changes in the existing environment which could result in the conversion of farmland to non-agricultural use or conversion forest land to non-forest use.

Sources:

California Department of Parks and Recreation (CDPR). 1975. Pismo State Beach and Pismo Dunes State Vehicular Recreation Area General Development Plan and Resource Management Plan. April.

San Luis Obispo County. 2009. Coastal Zone Land Use Ordinance, Title 23 Of The San Luis Obispo County Code. Revised January 2009.

_____ 2007. South County-Coastal Planning Area Rural Land Use Category Map. Department of Planning and Building. Revised October 23, 2007.

_____ 1989. The Land Use and Circulation Elements of the San Luis Obispo County General Plan, South County Coastal. Adopted by the San Luis Obispo County Board of Supervisors March 1, 1988 - Resolution 88-115, Amended March 14, 1989.

3.3 AIR QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.3.1 Environmental and Regulatory Setting

Air quality is a function of pollutant emissions and topographic and meteorological influences. The physical features and atmospheric conditions of a landscape interact to affect the movement and dispersion of pollutants and determine its air quality. The U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) are the federal and state agencies charged with maintaining air quality in the nation and state, respectively. The USEPA delegates much of its authority over air quality to CARB. CARB has geographically divided the state into 15 air basins for the purposes of managing air quality on a regional basis. An air basin is a CARB-designated management unit with similar meteorological and geographic conditions. There are 15 air basins in the state. Pismo State Beach and adjacent Oceano Dunes SVRA lie within San Luis Obispo County in the South Central Coast Air Basin (SCCAB). The SCCAB covers all of San Luis Obispo County, Santa Barbara County, and Ventura County.

The USEPA has established National Ambient Air Quality Standards (NAAQS) for six common air pollutants: ozone (O3), particulate matter (PM), which consists of “inhalable coarse” PM (particles between 2.5 and 10 microns in diameter, or PM10) and “fine” PM (particles 2.5 microns in diameter and smaller, or PM2.5), carbon monoxide (CO), nitrogen dioxide (NO2), sulfur dioxide (SO2), and lead. The USEPA refers to these six common pollutants as “criteria” pollutants because the agency regulates the pollutants on the basis of human health and/or environmentally-based criteria. CARB has established California Ambient Air Quality Standards (CAAQS) for the six common air pollutants regulated by the federal Clean Air Act (the CAAQS are more stringent than the NAAQS), plus the following pollutants: hydrogen sulfide (H2S), sulfates (SOX), vinyl chloride, and visibility reducing particles. The federal and state governments have also established exhaust emission standards for on- and off-road vehicles, such as cars, trucks, recreational vehicles, and heavy-duty diesel construction equipment as well as the fuels these vehicles use

Pismo State Beach 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. These strong prevailing winds exert a force on the surface of the dunes that causes particles to move along the ground surface. This movement can take the form of sand creep, in which sand grains are pushed along the ground surface, or saltation, in which sand grains are lifted by the wind, carried a short distance (generally a few inches to a few feet), and then fall back down to the ground surface. These processes can cause some particles to become suspended in the air and carried away downwind. Generally, when winds exceed approximately 10 miles per hour, the sand grains in the unvegetated dunes that naturally form in the Guadalupe-Nipomo Dunes Complex begin to creep or saltate and generate dust and PM that can affect air quality conditions, although the wet hardpack near the surf zone is least prone to saltation.

The San Luis Obispo County Air Pollution Control District (SLOAPCD), the local agency charged with preserving air quality, divides SLO County into different air quality regions that have similar geologic and meteorological conditions. Pismo State Beach is located in the South County air quality region of SLO County. The SLOAPCD maintains and operates three ambient air quality monitoring stations in the South County Region: CDF-Arroyo Grande, Mesa2, and Nipomo-Regional Park (SLOAPCD 2014a). These stations measure ambient concentrations of particulate matter, which is a regulated air pollutant under both the federal and state Clean Air Act. Particulate matter is known to cause adverse lung, heart, and other health effects, and is considered a “criteria” air pollutant because the USEPA and CARB regulate PM on the basis of human health and/or environmentally-based criteria (USEPA 2016a). The national and state Clean Air Acts regulate two kinds of particulate matter: PM₁₀, also called “inhalable coarse” PM, which consists of particles with an aerodynamic diameter of 10 micrometer or less, and PM_{2.5}, also called “fine” particulate matter, which consists of particles with an aerodynamic diameter of 2.5 microns or less. Both types of PM are very small, invisible to the naked eye, and are capable of penetrating deep into the lungs (and potentially bloodstream), resulting in adverse health effects (USEPA 2016b).

Of the three South County monitoring stations, CDF is the closest to Pismo State Beach, located approximately 0.5 miles to the southeast. The Nipomo-Regional Park station is more than five miles and Mesa2 approximately two miles southeast of the project area. From 2010 to 2015 the SLOAPCD’s CDF monitoring station measured levels of PM that were above the state’s 24-hour standard for PM₁₀, which is set at 50 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), an average of 75 times per year. In addition, the CDF station measured levels of PM₁₀ that exceeded the national 24-hour standard for PM₁₀ (150 $\mu\text{g}/\text{m}^3$) three times in 2012, two times in 2013, and two times in 2014 (SLOAPCD 2013, 2014b, 2016); the station did not exceed the national 24-hour standard in 2015, nor in 2016 (to date). The CDF station also measured levels of PM_{2.5} that exceeded the national 24-hour standard for PM_{2.5} (35 $\mu\text{g}/\text{m}^3$) three times in 2013, four times in 2014, and one time in 2015 (CARB 2016, SLOAPCD 2014b, 2016). The OHMVR Division currently undertakes a number of dust control and monitoring activities at Oceano Dunes SVRA and Pismo State Beach.

The SLOAPCD currently has nine regulations containing approximately 100 rules that control and limit emissions from sources of air pollutants. This includes Rule 1001, Coastal Dunes Dust Control Requirements, which requires the operator of a coastal dune vehicle activity area (CDVAA) greater than 100 acres in size to prepare and implement a Particulate Matter Reduction Plan (PMRP) to minimize PM₁₀. Rule 1001, Section B.4., defines the term CDVAA as “Any area within 1.5 miles of the mean high tide line where public access to coastal dunes is allowed for vehicle activity.” The parts of Pismo State Beach and adjacent Oceano Dunes SVRA where vehicle activity is permitted comprise a CDVAA as defined by SLOAPCD Rule 1001.

In 2001, the SLOAPCD adopted its 2001 Clean Air Plan. This plan updates the SLOAPCD's 1998 Clean Air Plan, addresses ozone and particulate matter emissions, and identifies the control measures necessary to attain air quality standards.

3.3.2 Discussion

Would the proposed project:

a. Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. Within San Luis Obispo County, the applicable air quality plan is the SLOAPCD's 2001 Clean Air Plan (SLOAPCD 2001). This plan addresses attainment and maintenance of state and federal ambient air quality standards (SLOAPCD 2001, page 1-1); however, the Clean Air Plan "primarily addresses the [County's] ozone nonattainment problem" (SLOAPCD 2001, page 1-2). The OHMVR Division notes that Chapters 4 and 7 of the Clean Air Plan present a 1991 reference year emissions inventory summary (SLOAPCD 2001, Table 4-1) and uncontrolled and controlled reactive organic gas (ROG) and nitrogen oxide (NOX) emissions forecasts for 1996, 2000, 2003, 2006, and 2015 (SLOAPCD 2001, Tables 7-1 and 7-2, respectively). The 1991 inventory and 1996, 2000, 2003, 2006, and 2015 emissions forecasts all include an "Off-Road Recreational Vehicle" line item in their "Other Mobile" source category. The Clean Air Plan defines mobile sources to include "on-road vehicles like cars and trucks, and other mobile sources such as off-road vehicles, airplanes, and ships" (SLOAPCD 2001, page 4-3). The Clean Air Plan contains a list of ARB mobile source control strategies (SLOAPCD 2001, Table 6-3) and also acknowledges that CARB is "responsible for adopting off-road mobile source emission standards for source categories not regulated by EPA" (SLOAPCD 2001, page 8-2). In addition, the Clean Air Plan (page 7-1) states:

Two different regulatory scenarios were used in developing the emission forecasts for this Plan:

The first forecast scenario is presented in Table 7-1 and reflects projected future emissions assuming none of the control measures described in this Plan are implemented. This forecast accounts for future year socioeconomic growth and the emission reductions anticipated from District rules adopted prior to 1989. Emission reductions from existing and anticipated future control measures adopted by the state ARB for consumer products, utility engines, on-road and *off-road motor vehicles*, and other mobile sources are also included in this forecast. (emphasis added)

Emissions of ROG and NOX from OHVs, therefore, appear to be accounted for in the Clean Air Plan. Regarding PM10, the Clean Air Plan's 1991 reference year emissions inventory (Table 4-1) does include an estimate of "PM" and "PM-10" emissions for "Off-Road Recreational Vehicles"; however, the Clean Air Plan's emission forecasts are limited to ROG and NOX, presumably because the 2001 Plan "primarily addresses the [County's] ozone nonattainment problem (SLOAPCD 2001, page 1-2).

The District's 2009 emission inventory acknowledges that it does not include a specific estimate of emissions from Oceano Dunes SVRA because emission factors from that source are not currently available. Dust and particulate matter are the pollutant of greatest concern downwind of Pismo Beach and Oceano Dunes SVRA. The proposed special event would take place on hard pack sand that is not prone to saltation and would occur outside of the windy season when the CDF station typically measures the highest levels of particulate matter. The proposed race event would also occur near Grand Avenue, in front of a large, artificial foredune system that breaks the flow of the prevailing winds, decreasing the potential for saltation. Although the race area is located upwind of the residential areas, the Nipomo Mesa, and the SLOAPCD CDF monitoring station, it is not an area that the OHMVR Division, SLOAPCD, and CARB have identified as an area most likely influencing air quality conditions downwind of Pismo State Beach and Oceano Dunes SVRA. The OHMVR Division continues to work with the SLOAPCD

and CARB to control dust and PM10 downwind of Pismo Beach and Oceano Dunes SVRA, both voluntarily and as required under Rule 1001. These ongoing efforts are intended to result in a net air quality benefit on the Nipomo Mesa. Thus, the proposed project would not conflict with an applicable air quality plan or Rule 1001.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. The Race of Gentlemen is a two-day, temporary event that is expected to draw a large number of visitors to Pismo State Beach. These visitors would generate emissions primarily from street-legal automobiles and motorcycles that are consistent with normal park operations; however, as described in Section 2.3, the race event itself would consist of 120 pre-World War II vehicles (80 cars and 40 motorcycles) racing for a distance of approximately 660 feet (0.125 miles). These vintage automobiles and motorcycles are required to use pre-World War II (i.e., pre-1940's) chassis and engines, and thus these restored vehicles would likely be exempt from current motor vehicle exhaust standards established by the USEPA and CARB. Specific information on the emissions profiles for remanufactured, pre-1940's vehicles is not available; however, Table 3 compares the emissions standards for pre-1970 vehicles (i.e., emission before passage of the federal Clean Air Act) against current emissions standards for motor vehicles and off-highway recreational vehicles.

Table 3. Comparison of Emission Factors					
Vehicle Type	Pollutant Emission Factor (Grams / Mile)				
	ROG	NOX	CO	PM10	CO2
<i>On-Road Passenger Car^(A)</i>					
Model Year 1965	5.454	4.663	62.720	0.057	474.816
Model Year 2016	0.007	0.034	0.402	0.002	268.664
<i>On-Road Motorcycle^(B)</i>					
Model Year 1965	8.138	0.516	51.589	0.051	70.668
Model Year 2016	2.019	1.083	15.827	0.002	167.376
<i>Off-Road All-Terrain Vehicle</i>					
2-Stroke	34.2	0.01	54.1	0.42	109.63
4-Stroke	0.68	0.49	19.8	0.06	109.63
Source: EMFAC2014, RV2013					
(A) Emission factors based on 25% of the gasoline automobiles travelling 25 miles per hour, 50% of the gasoline automobiles traveling at 35 miles per hour, and 25% of the gasoline automobiles traveling at 40 miles per hour.					
(B) Emission factors based on 25% of the gasoline motorcycles traveling at 30 miles per hour, 50% of the motorcycles traveling at 35 miles per hour, and 25% of the motorcycles traveling at 40 miles per hour.					

In general, the EMFAC data for 1965 on-road passenger cars indicate emissions generated by the cars will be greater at 35 miles per hour, as opposed to 25 miles per hour, or 40 miles per hour; the same holds true with the 1965 on-road motorcycle data. As shown in Table 3, race vehicles may emit more pollutants on a grams-per-mile basis than current on-road and some all-terrain vehicles; however, the total miles traveled during the entire race weekend would be minor (approximately 24 to 30 miles, depending on the number of races run per hour), and would generate less than one pound of emissions of ROG, NOX, and PM10, and less than four pounds of CO during the entire duration of the two-day event. These levels of emissions would not cause or contribute to any existing or projected air quality violation.

- c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Less Than Significant Impact. As discussed in a) and b) above, The Race of Gentlemen would not conflict with an applicable air quality plan nor cause or substantially contribute to an existing or projected air quality violation. Thus, the project would not result in a cumulatively considerable net increase in any pollutant for which the SCCAB does not attain ambient air quality standards (ozone and PM10).

- d. Expose sensitive receptors to substantial pollutant concentrations?**

Less Than Significant Impact. Sensitive receptors are people or groups of people that have an increased sensitivity to air pollution or environmental contaminants. A sensitive receptor is generally defined as a location where human populations, especially children, seniors, and sick people, may be continuously exposed to air pollutants. These typically include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The Race of Gentlemen is a two-day event that would occur at Pismo State Beach, more than a mile away from most sensitive receptors. The event would not increase day use vehicles at Pismo State Beach above permit limits. It is expected to result in a large number of walk-in visitors that are likely to park in the vicinity of sensitive receptors including residences in Grover Beach; however, given the intermittent and short-term (two days) nature of the event's activities, it would not expose sensitive receptors to substantial pollutant concentrations.

- e. Create objectionable odors affecting a substantial number of people?**

Less Than Significant Impact. Visitor vehicle traffic in Grover Beach has the potential to cause common odors associated with vehicle operation (e.g., gasoline, oils) in the immediate vicinity of the roadway; however, these odors would not affect a substantial number of people. Event activities within Pismo State Beach would not create objectionable off-site odors that could affect a substantial number of people.

Sources:

California Air Resources Board (CARB) 2007. *Staff Report California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit*. Sacramento, CA. November 16, 2007.

http://www.arb.ca.gov/cc/inventory/pubs/reports/staff_report_1990_level.pdf

_____. 2009. *Climate Change Scoping Plan – A Framework for Change*. Endorsed by ARB December 2008. Sacramento, CA. May 11, 2009.

<http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>

_____. 2011. *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document*. Released August 19, 2011. Sacramento, CA. Approved August 24, 2011.

<http://www.arb.ca.gov/cc/scopingplan/fed.htm>

_____. 2016. Air Quality and Meteorological Information System. n.d. Web. April 6, 2016.

<<http://www.arb.ca.gov/aqmis2/aqdselect.php>>

San Luis Obispo County Air Pollution Control District (SLOAPCD). 2001. *Clean Air Plan San Luis Obispo County*. San Luis Obispo County, CA. December 2001.

_____. 2012a. *Strategic Action Plan 2013 - 2017*. San Luis Obispo, CA. November 2012.

_____. 2012b. *CEQA Air Quality Handbook: A Guide for Assessing the Air Quality Impacts for Projects Subject to CEQA Review*. San Luis Obispo, CA. April 2012.

_____. 2013. 2012 Annual Air Quality Report. San Luis Obispo, CA. November 2013.

_____. 2014a. 2013 Annual Air Quality Report. San Luis Obispo, CA. September 2014.

_____2014b. "2013 Annual Air Quality Report" [PowerPoint Presentation]. 2014.

_____2016. 2014 Annual Air Quality Report. San Luis Obispo, CA. January 2016.

United States Environmental Protection Agency (USEPA) 2016a. "Particulate Matter (PM) Pollution." Particulate Matter. U.S. EPA, Science and Technology [Air], National Ambient Air Quality Standards, Six Principal Pollutants. February 23, 2016. Web. April 6, 2016. <<https://www.epa.gov/pm-pollution>>

_____2016b. "Particulate Matter Basics." Particulate Matter Basics. U.S. EPA, Science and Technology [Air], National Ambient Air Quality Standards, Six Principal Pollutants, Particulate Matter. February 23, 2016. Web. April 6, 2016. <<https://www.epa.gov/pm-pollution/particulate-matter-pm-basics#effects>>

3.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.4.1 Regulatory Setting

In addition to CEQA, other federal and state laws apply to the biological resources identified in this report. Each of these laws is identified and discussed below.

Federal Endangered Species Act (FESA)

FESA establishes a broad public and federal interest in identifying, protecting, and providing for the recovery of threatened or endangered species. The Secretary of the Interior and the Secretary of Commerce are designated in FESA as responsible for identifying endangered and threatened species and their critical habitat, carrying out programs for the conservation of these species, and rendering opinions regarding the impact of proposed federal actions on listed species. The USFWS and the National Marine Fisheries Service (NMFS) are charged with implementing and enforcing FESA. USFWS has authority over terrestrial and continental aquatic species, and NMFS has authority over species that spend all or part of their life cycle at sea, such as salmonids.

Section 9 of FESA prohibits the unlawful “take” of any listed fish or wildlife species. Take, as defined by FESA, means “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such action.” The USFWS’s regulations define harm to mean “an act which actually kills or injures wildlife.” Such an act “may include “significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding or sheltering” (50 CFR § 17.3). Take can be permitted under FESA pursuant to sections 7 and 10. Section 7 provides a process for take permits for federal projects or projects subject to a federal permit, and Section 10 provides a process for incidental take permits for projects without a federal nexus. FESA does not extend the take prohibition to federally listed plants on private land, other than prohibiting the removal, damage, or destruction of such species in violation of state law.

The Migratory Bird Treaty Act of 1918 (MBTA)

Under the MBTA, it is unlawful to “pursue, hunt, take, capture or kill; attempt to take, capture or kill; possess, offer to or sell, barter, purchase, deliver or cause to be shipped, exported, imported, transported, carried or received any migratory bird, part, nest, egg or product, manufactured or not.” In short, under the MBTA it is illegal to disturb a nest that is in active use, since this could result in killing a bird or destroying an egg. The USFWS oversees implementation of the MBTA.

California Endangered Species Act (CESA)

Provisions of CESA protect state-listed threatened and endangered species. The Fish and Game Commission is charged with establishing a list of endangered and threatened species. CDFW regulates activities that may result in “take” of individuals (i.e., “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”). Habitat degradation or modification is not expressly included in the definition of “take” under the California Fish and Game Code, but CDFW has interpreted “take” to include the killing of a member of a species which is the proximate result of habitat modification.

Fish and Game Code Section 3503, 3503.5, and 3505

Pursuant to Fish and Game Code section 3503, it is unlawful to “take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto.” Sections 3503.5 and 3505 provide similar protection specifically to raptors and their nests and to egrets, respectively. Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “taking” by CDFW.

Species of Special Concern and Fish and Game Code Fully Protected Species

CDFW maintains lists of animal Species of Special Concern (CSSC) that serve as “watch lists.” A CSSC is not subject to the take prohibitions of CESA. The CSSC are species that are declining at a rate that could result in listing under FESA or CESA and/or have historically occurred in low numbers, and known threats to their persistence currently exist. This designation is intended to result in special consideration for these animals and is intended to focus attention on the species to help avert the need for costly listing under federal and state endangered species laws. This designation also is intended to stimulate collection of additional information on the biology, distribution, and status of poorly known at-risk species, and focus research and management attention on them.

Four sections of the Fish and Game Code list 37 fully protected species (Fish and Game Code §§ 3511, 4700, 5050, and 5515). Fully protected species may generally not be taken or possessed except for scientific research. Incidental take of species that are designated as fully protected may be authorized via development of a natural community conservation plan (NCCP; Fish and Game Code § 2800 et seq.).

Fish and Game Code Section 4150

Pursuant to Fish and Game Code section 4150, “[a]ll mammals occurring naturally in California which are not game mammals, fully protected mammals, or fur-bearing mammals, are nongame mammals. Nongame mammals or parts thereof may not be taken or possessed except as provided in this code or in accordance with regulations adopted by the commission.”

3.4.2 Environmental Setting

Vegetation and Wildlife

Four sensitive habitat types are found in and around the project site: coastal strand, active pioneer coastal dune, central coast dune scrub, and central coast foredunes. Pismo State Beach represents the northern extent of the Guadalupe-Nipomo Dunes system, having the plant and animal communities that are typical of the Guadalupe-Nipomo Dunes, and is therefore considered part of the larger dune system.

The Guadalupe-Nipomo Dunes is the largest remaining dune system south of San Francisco and the second largest in the state of California. It encompasses an 18-mile (29 km) stretch of coastline on the central coast of California and extends from southern San Luis Obispo County to northern Santa Barbara County. The Guadalupe-Nipomo Dunes system is home to a unique dunes ecosystem and is recognized as a National Natural Landmark.

Special-Status Species

Special-status species are those plants and animals that are legally protected or otherwise recognized as vulnerable to habitat loss or population decline by federal, state, or local resource conservation agencies and organizations. In this analysis, special-status species include:

- Species that are state and/or federally listed or proposed for listing as threatened or endangered
- Species considered as candidates for listing as threatened or endangered
- CDFW Species of Special Concern
- Fully protected species per California Fish and Game Code
- Plants considered by the California Native Plant Society (CNPS) and CDFW to be rare, threatened, or endangered [California rare plant ranked, (CRPR); e.g. CRPR 1B]

A list of those special-status species that have potential to occur in the project area is presented in Appendix B. Due to the fact that the proposed project activity would occur within the street legal vehicle riding and developed campground areas of Pismo State Beach, most of the species have no or low potential to occur in the proposed special event area. These species are summarized in Appendix B and are not further addressed in this analysis. Three species with potential for occurrence, monarch butterfly (*Danaus plexippus*), California brown pelican (*Pelecanus occidentalis californicus*), and western snowy plover (*Charadrius alexandrinus nivosus*), are discussed further below.

Monarch Butterfly

Monarch butterflies roost in eucalyptus trees adjacent to North Beach Campground at Pismo State Beach from late October to February. While the monarch itself does not currently have legal protection, CDFW recognizes it as a “Special-status Invertebrate” and tracks its known communal wintering sites. On California State Park property, monarch butterflies and their overwintering habitat are protected from development and visitor use; collecting and killing of all animals, including monarchs, and destruction of all native vegetation is prohibited.

California Brown Pelican

The California brown pelican, a fully protected species under the California Fish and Game Code, has potential to come to shore to rest in the event area, but does not breed or forage on land at Pismo State Beach.

Western Snowy Plover

Pismo State Beach and Oceano Dunes SVRA both contain known habitat for the western snowy plover, a federally-listed threatened species and CSSC that breeds, forages, and roosts on sandy beaches and adjacent open habitats. Nests are initiated as early as March, with all breeding activities concluded by the end of September. Throughout the non-breeding season (October – February), western snowy plovers along the coast tend to aggregate in loose flocks along the beach, often around the mouths of freshwater creeks and rivers and along the swash line or upper beach. Although the USFWS has designated western snowy plover critical habitat within Pismo State Beach, designated critical habitat does not extend as far north as the Race of Gentlemen event area. Western snowy plovers occur within Pismo State Beach year round and could roost or forage within the event area in October.

3.4.3 Discussion

Would the proposed project:

- a. **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

Less than Significant Impact.

Monarch Butterfly. The proposed project would have no impact on the Monarch butterfly. At the time of the event, butterfly numbers would be low, if any, as most butterflies would not have arrived for overwintering. No event activities would occur within the grove itself.

Snowy Plover and Brown Pelican. The October date for The Race of Gentlemen event falls within the non-breeding season for the western snowy plover (October 1 through February 28), and thus no nests, eggs, or chicks would be affected. The event would not draw additional visitors to the park beyond permitted limits, would occur within an area already active with vehicle use, and the race would be held within a closed course bounded by fencing to the east and the ocean to the west. The noise and overall activity within the race course area would likely discourage western snowy plovers or any other shorebirds from roosting or foraging in or near the race course, but they could occur there. Due to the high speed nature of the event, if western snowy plovers were roosting or foraging in the race course area, the event would pose a risk of collision with plovers. Similarly, brown pelicans do not breed or forage in the project area but may roost along the shoreline. Resting brown pelicans within the race course area could also be at risk of collision.

CDPR implements protection, monitoring, and management measures for western snowy plovers (and California least terns) at Pismo State Beach and Oceano Dunes SVRA. CDPR develops and implements an annual management plan for the western snowy plover and California least tern breeding season, which includes the following measures that are implemented year-round:

- Monitoring for locations of western snowy plovers within Oceano Dunes SVRA and Pismo State Beach
- Continued enforcement of dog leash laws
- Continued enforcement of the posted 15 MPH vehicle speed limits on the beach

Additionally, increased monitoring and enforcement of park rules during The Race of Gentlemen event would occur as a condition of the Special Event Permit (Section 2.5). These measures would ensure that a race heat would not proceed while any western snowy plovers or brown pelicans were in the race course. Any such birds found in the zone of collision risk would be monitored, and the race would be delayed, until the birds left on their own.

With park management measures and permit conditions in place, including additional monitoring of the race course area, dog leash law enforcement, and speed limit enforcement (other than within the race course area), the special event impact on western snowy plover and California brown pelican is less than significant. No additional mitigation is required.

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**
- c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact (Responses b – c). No impact to riparian or other aquatic habitat would occur due to the proposed Race of Gentlemen event. The race and event area would occur in the portion of the beach open to vehicle use, which does not contain wetland habitat. Although CDP 4-82-300-A5 and the County's Local Coastal Program refer to the area as environmentally sensitive habitat, the event would not alter the existing conditions of the shoreline habitat. Pismo State Beach and Oceano Dunes SVRA would continue to be subject to the daily vehicle use limits established by the CDP. Sensitive dune vegetation is fenced off from vehicular entry. No impact to sensitive dune habitat would occur. Implementation of the project would not result in the removal, filling, hydrological interruption, or other disturbances to wetlands as no wetlands occur within the event area.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

No Impact. See response to a. above.

- e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

No Impact. No heritage or ordinance trees are in the project area. As noted above, although CDP 4-82-300-A5 and the County's Local Coastal Program refer to the area as environmentally sensitive habitat, the event would not alter the conditions of the habitat. The project does not conflict with any local policies or ordinances protecting biological resources.

- f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?**

No Impact. The OHMVR Division is currently developing an HCP that includes Pismo State Beach; however, the HCP has not been approved by the trustee agencies. This project would be consistent with activities anticipated by the HCP.

Sources:

California Natural Diversity Database. Biogeographic Data Branch. California Department of Fish and Game. 2016.

California Department of Parks and Recreation (CDPR). 2016. 2016 Nesting Season Management Plan to Avoid Take of the California Least Tern and Western Snowy Plover at Oceano Dunes State Vehicular Recreation Area, San Luis Obispo County, California. February 2016.

_____. 2015. Nesting of the California Least Tern and Snowy Plover at Oceano Dunes State Vehicular Recreation Area, San Luis Obispo County, California, 2015 Season, Oceano

Dunes District, CDPR, Off-Highway Motor Vehicle Division. Prepared for California Department of Fish and Game and U.S. Fish and Wildlife Service.

3.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.5.1 Environmental Setting

No archaeological or paleontological sites are known to occur within the vehicle use area of Pismo State Beach where the Race of Gentlemen event is located. The cultural resources located within Pismo State Beach are part of the OHMVR Division’s Cultural Resource Management Program. All known cultural resources within Pismo State Beach are surveyed, recorded, protected, and preserved in compliance with the California Environmental Quality Act (CEQA), PRC 5024 and PRC 5024.5, among additional federal and state laws and regulations.

The Race of Gentlemen project area had been surveyed by OHMVR Division archaeologists as part of a prior cultural resource inventory of the Oceano Dunes District, which includes both Oceano Dunes SVRA and Pismo State Beach. The cultural resource inventory resulted in a final report, A Cultural Resource Inventory of the Oceano Dunes State Vehicular Recreation Area, San Luis Obispo County, California (Perez 2011). All cultural resources recorded during the 2009-2011 cultural resource inventory and identified as having significant cultural value and eligibility for listing in the National Register of Historic Places and/or the California Register of Historical Resources, occur within the fenced portion of the SVRA and are not located in designated vehicle area of Pismo State Beach where the Race of Gentlemen event is proposed.

One Native American group, the Northern Chumash have requested to be involved in AB52 consultation. A California State Park archaeologist submitted a consultation letter to Northern Chumash tribal representatives.

3.5.2 Discussion

Would the proposed project:

- a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

No Impact (Responses a – b). The area identified for the special event has been open to motorized vehicles for over a century. The event was reviewed by the OHMVR Division, and it was determined that there are no known archaeological sites within the area to be used for event activities. Ample protections are in effect, along with ongoing monitoring, to prevent issues from arising. In the unlikely event that cultural resources are discovered, pursuant to

standard CDPR protocols all activities surrounding the site would cease until the area has been cleared by a CDPR archaeologist.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The event would not significantly modify existing topography or impact paleontological resources or geologic features. There has been no documentation of unique paleontological resources or geological features in the project area by OHMVR Division cultural resource specialists, or by other resource staff.

d. Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. Native American remains found in June 2008 are located more than three miles to the south of event area. The area identified for the event has been open to motorized vehicles for over a century. In the unlikely event that human remains are discovered, pursuant to standard OHMVR Division protocols all activities surrounding the site would cease until the area has been cleared by an OHMVR Division archaeologist and the County Coroner is notified.

Sources:

California Department of Parks and Recreation (CDPR). 2000. Cultural Resource Inventory Survey of the CCMA Project Area, in Compliance with CEQA, conducted by Phil Hines, Associate State Archaeologist, and Dionne Gruver, Archaeological Project Lead in 2000, Oceano Dunes State Vehicular Recreation Area, San Luis Obispo County.

Perez. 2011. Alicia C. Perez. *A Cultural Resource Inventory of Oceano Dunes SVRA, San Luis Obispo County, California*. CDPR, OHMVR Division. Submitted to CDPR, OHMVR Division. Copies available from CDPR, OHMVR Division, Sacramento, CA.

3.6 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.6.1 Discussion

Would the proposed project:

- a. **Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - 1. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**
 - 2. **Strong seismic ground shaking?**
 - 3. **Seismic-related ground failure, including liquefaction?**
 - 4. **Landslides?**

No Impact (Responses a1 – a4). Although Pismo State Beach is located in a seismically active area associated with the San Andreas fault system, the proposed special event would not expose people or structures to seismic or landslide hazards. No new buildings or permanent facilities are proposed; small temporary structures associated with the event such as vendor tables or spectator fencing would not pose a hazard to park visitors during a seismic event. San Luis Obispo County hazard maps show the project area to have a low potential for landslides. However, the area proposed for the Race of Gentlemen event is a stretch of beach currently open to vehicular activity. No landslide risk would result from the operation of this event. The proposed special event would not exacerbate existing geologic conditions on the project site or surrounding areas.

b. Result in substantial soil erosion or the loss of topsoil?

No Impact. The project activities would occur in sand, a highly erosive material, but typical of the area because of the beach location. The Race of Gentlemen event area is currently open to street-legal vehicular activity. No additional erosion would result from this event. All event activities would be located on the sandy beach; therefore, there would be no loss of topsoil.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

No Impact. Staging facilities for the event would be located on the flat portions of the beach. The event race course would be located in the sand hardpack, which is subject to daily fluctuations from the ocean tide. The event would not affect the stability of the beach. Sand by nature is unstable; however, the small, temporary nature of the event facilities (vendor booths, stage, bleachers, fencing, etc.) would not expose people or structures to any risk from sand movement. The installed bleachers would be designed for deployment on sandy surfaces and meet manufacturing specifications for load. The fire marshal would review the proposed structures for compliance with public safety standards.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. Expansive soils are not a consideration in the sandy soils found in the project area.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The project does not propose installation of new septic tanks nor does the project create the need for a system for disposal of additional wastewater.

Sources:

San Luis Obispo County. 2013. Coastal Zone Land Use Ordinance, Title 23 Of The San Luis Obispo County Code. Revised November 2013.

_____ 2007. South County-Coastal Planning Area Rural Land Use Category Map. Department of Planning and Building. Revised October 23, 2007.

_____ 1989. The Land Use and Circulation Elements of the San Luis Obispo County General Plan, South County Coastal. Adopted by the San Luis Obispo County Board of Supervisors March 1, 1988 - Resolution 88-115, Amended March 14, 1989.

3.7 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.7.1 Regulatory and Environmental Setting

Gases that trap heat in the atmosphere and affect regulation of the Earth’s temperature are known as greenhouse gases (GHGs). GHGs that contribute to climate regulation are a different type of pollutant than criteria or hazardous air pollutants because climate regulation is global in scale, both in terms of causes and effects. Some GHGs are emitted to the atmosphere naturally by biological and geological processes, such as evaporation (water vapor), aerobic respiration (carbon dioxide), and off-gassing from low oxygen environments including swamps or exposed permafrost (methane); however, GHG emissions from human activities, such as fuel combustion (carbon dioxide) and refrigerants (hydrofluorocarbons), are primarily responsible for the significant contribution to overall GHG concentrations in the atmosphere, climate regulation, and global climate change.

Human production of GHGs has increased steadily since pre-industrial times (approximately pre-1880), and atmospheric carbon dioxide concentrations in the atmospheric carbon dioxide concentrations have increased from a pre-industrial value of 280 ppm in the early 1800’s to 407 ppm in March 2016 (NOAA 2016). The effects of increased GHG concentrations in the atmosphere include climate change (increasing temperature and shifts in precipitation patterns and amounts), reduced ice and snow cover, sea level rise, and acidification of oceans. These effects in turn will impact food and water supplies, infrastructure, ecosystems, and overall public health and welfare.

The 1997 United Nations’ Kyoto Protocol international treaty set targets for reductions in emissions of four specific GHGs – carbon dioxide, methane, nitrous oxide, and sulfur hexafluoride – and two groups of gases – hydrofluorocarbons and perfluorocarbons. These GHG are the primary GHG emitted into the atmosphere by human activities. Common GHGs include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), and sulfur hexafluoride (SF₆).

GHG emissions from human activities contribute to overall GHG concentrations in the atmosphere and the corresponding effects of global climate change (e.g., rising temperatures, increased severe weather events such as drought and flooding). GHGs can remain in the atmosphere long after they are emitted. The potential for a GHG to absorb and trap heat in the atmosphere is considered its global warming potential (GWP). The reference gas for measuring GWP is CO₂, which has a GWP of one. By comparison, CH₄ has a GWP of 25, which means that one molecule of CH₄ has 25 times the effect on global warming as one molecule of CO₂. Multiplying the estimated emissions for non-CO₂ GHGs by their GWP determines their carbon dioxide equivalent (CO₂e), which enables a project’s combined global warming potential to be expressed in terms of mass CO₂ emissions.

The California Global Warming Solutions Act of 2006 (AB32) requires CARB to reduce GHG emissions to 1990 levels by 2020. CARB identified 427 million metric tons of carbon dioxide

equivalent (MTCO_{2e}) as the total statewide GHG 1990 emissions level and adopted this level as the 2020 GHG emissions limit (CARB 2007). CARB estimates 2020 GHG emission levels will reach approximately 600 million MTCO_{2e} if no actions are taken under a “business-as-usual” scenario. To achieve the necessary GHG reductions, CARB approved the *Climate Change Scoping Plan* on December 11, 2008 identifies the measures (i.e., mandatory rules and regulations and voluntary measures) that will achieve at least 174 MMTCO_{2e} of reductions and reduce statewide GHG emissions to 1990 levels by 2020 (CARB 2008). In 2011, the CARB released a supplement to the 2008 Scoping Plan Functional Equivalent Document (FED) that included an updated 2020 BAU statewide GHG emissions level projection of 507 MMTCO_{2e} (CARB 2011). CARB recently released its first update to the Scoping Plan (CARB 2014).

Executive Order B-30-15, or the 2030 Carbon Target and Adaptation, issued by Governor Brown in April 2015, sets a target of reducing GHG emissions by 40 percent below 1990 levels in 2030. By directing state agencies to take measures consistent with their existing authority to reduce GHG emissions, this order establishes coherence between the 2020 and 2050 GHG reduction goals set by AB 32 and seeks to align California with the scientifically established GHG emissions levels needed to limit global warming below two degrees Celsius. In addition, the order requires CARB to work closely with other state agencies and the public to update the State’s climate change Scoping Plan, scheduled for completion and adoption in 2016. CARB has also adopted several rules designed to reduce vehicular GHG emissions, including the Pavley Regulations (AB1493), which will reduce GHG emissions from passenger vehicles between 22 and 30 percent, and the Low Carbon Fuel Standard, which requires a ten percent reduction in the carbon intensity of transportation fuels by 2020.

In 2009, the OHMVR Division adopted its Strategic Plan, which describes five guiding principles and adopts a framework of six goals for the OHMVR Division to meet its legislative mandates (OHMVR Division 2009). The OHMVR Division adheres to the guiding principles outlined in its Strategic Plan during management and operation of its SVRAs, including the principles of sustainability, transparency in decision making, and use of sound data for management decision making. Specifically, as outlined in Objective 1.3 of the Strategic Plan, this would include a goal, by 2020, to reduce the carbon footprint associated with SVRA management by 25% below 2009/2012 fiscal year levels.

In 2011, the San Luis Obispo County Board of Supervisors adopted the EnergyWise Plan, which outlines the County’s approach to reducing municipal and community-wide GHG emissions to 15% below baseline 2006 levels by establishing goals, measures, and actions (San Luis Obispo County 2011). This plan includes emissions from off-road equipment and transportation in its GHG inventories and reduction goals.

3.7.2 Discussion

Would the proposed project:

- a. **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

Less Than Significant Impact. The Race of Gentlemen is temporary (two-day) recreational event that would generate greenhouse gas emissions from existing, in-use on- and off-road street legal vehicles participating in the race and coming to attend the event. An estimated 2,000 passenger vehicles would attend the event. The event would not involve stationary sources of equipment that would consume substantial amounts of electricity or fuel, would not result in vehicle or camping activity at the park that exceeds permitted levels, and would not result in permanent land use changes that significantly alter existing recreation and vehicle use patterns. In addition, the event organizer would control and manage traffic to reduce idling and the inefficient combustion of fuels to the maximum extent practicable. Race vehicles would be built using pre-World War II chassis and engines that would not combust as efficiently, and are

not subject to the same regulatory standards, as modern-day vehicles. Vintage vehicles are likely to produce higher GHG emissions; however, the limited number of racing vehicles (120) and short race distances (0.125 miles) would not generate levels of GHG emissions (less than 30 pounds total) that represent a significant effect on the environment.

b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The project consists of a temporary recreational event. There are no applicable plans, policies, or regulations governing GHG emissions from recreational events; however, individual recreationists and vehicles not participating in the race or exhibition would be subject to rules and regulations pertaining to vehicle emission standards, fuel standards, and regional transportation plans intended to reduce GHG emissions, such as the Pavley Regulations and the Low Carbon Fuel Standard.

Sources:

California Air Resources Board (CARB). 2007. *Staff Report California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit*. Sacramento, CA. November 16, 2007. <http://www.arb.ca.gov/cc/inventory/pubs/reports/staff_report_1990_level.pdf>

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_____. 2014. *First Update to the Climate Change Scoping Plan*. Sacramento, CA. May 2014.

California Department of Parks and Recreation, Off-Highway Motor Vehicle Recreation (OHMVR) Division 2009. *Strategic Plan*. Sacramento, CA. 2009.

County of San Luis Obispo (SLO County). 2011 *EnergyWise Plan – Designing Energy and Climate Solutions for the Future*. Prepared by PMC for San Luis Obispo County. San Luis Obispo County, Ca. November 2011.

3.8 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.8.1 Discussion

Would the proposed project:

- a. **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- b. **Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?**

- c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or hazardous waste within one-quarter mile of an existing or proposed school?**

No Impact (Responses a – c). Gasoline and diesel needed to power vehicles and generators would be the only hazardous materials in use on the project site, and park rules require that fuel be legally contained within the vehicles or in specially designed fuel cans. All refueling of vehicles would occur off the beach at local gas stations. No maintenance of vehicles on the beach would be permitted. All vehicles would be inspected for leaks prior to admittance on the race course (see Special Event Permit conditions in Section 2.5). All racers are required to have a drip tray or absorbent pad under their car in the pits for any drips. Spill containment would be provided in the event of a leak while on the race course. Event organizers would have shovels and sealable 5-gallon buckets on hand at several locations to remove any spill. In addition, the event would not increase the amount of fuel used over the event weekend. The project would not involve the routine transport, use, or disposal of other types of hazardous materials such as asbestos, lead, toxic waste, etc. The project would not involve hazardous emissions. The nearest school is over one mile from the event site.

- d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?**

No Impact. No hazardous material sites are known to occur on or in the vicinity of the project site. The project site is not on the Department of Toxic Substance Control's Hazardous Waste and Substance Site List (Cortese List).

- e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**
- f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

No Impact (Responses e – f). The airport closest to the project site is the Oceano County Airport located in Oceano. This airport is a general aviation airport and has an adopted Airport Land Use Plan (2007). The project site is located over one mile north of the airport and is not located within the Oceano County Airport land use plan area (Airport Land Use Commission 2007). The airport would not pose a safety hazard to participants of the Race of Gentlemen special event. There are no private air strips within two miles of the project site.

- g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

No Impact. The proposed special event would not impair implementation of or physically interfere with the existing Pismo State Beach emergency response plan or emergency evacuation plan.

- h. Expose people or structures to a significant risk of loss, injury, or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wild lands?**

No Impact. The project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. The project is not within the urban/wildland interface. Pismo State Beach has adequate firefighting capabilities in the event of small fires within the park, and for larger fires, the area would be subject to existing Pismo State Beach emergency response plans.

Sources:

*The Race of Gentlemen Special Event Initial Study/Negative Declaration – September 2016
California Department of Parks & Recreation, Off-Highway Motor Vehicle Recreation Division*

San Luis Obispo County Airport Land Use Commission. 2007. Airport Land Use Plan for the Oceano County Airport. Adopted February 1976. Amended May 2007.

3.9 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.9.1 Discussion

Would the proposed project:

a. Violate any water quality standards or waste discharge requirements?

No Impact. The project would not create the need for additional wastewater discharge and would not cause any discharge with the potential to violate water quality standards. Additionally,

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the event would not generate a substantial increase in vehicles within Pismo State Beach. The Race of Gentlemen event would be subject to the protection measures that are in effect at Pismo State Beach. The project would not violate any water quality standards or waste discharge requirements.

- b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?**

No Impact. The project would not extract groundwater and therefore would not affect the quantity of subsurface water supplies. The project would not change the direction or rate of groundwater flow. The project does not involve the use of groundwater supplies and therefore does not impact the groundwater table or nearby wells.

- c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?**
- d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?**
- e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?**

No Impact (Responses c – e). The existing drainage pattern of the area would not be altered as a result of the event. The project would not alter the course of a stream or river. The event would not generate additional vehicles within Pismo State Beach. There would be no increase in the rate or amount of surface runoff, because no new impermeable surfaces would be developed for the event. The event would not create additional sources of polluted runoff.

- f. Otherwise substantially degrade water quality?**

No Impact. The small event would not affect water quality as it would not increase vehicle use on the beach beyond permitted limits or otherwise introduce new pollutants or pollutant sources to Pismo State Beach. All refueling of vehicles would occur off the beach, and no maintenance of vehicles on beach would be permitted. All vehicles would be inspected for leaks prior to admittance on the race course (see Special Event Permit conditions in Section 2.5). All racers are required to have a drip tray or absorbent pad under their car in the pits for any drips. Spill containment would be provided in the event of a leak while on race course. Event organizers would have shovels and sealable 5-gallon buckets on hand at several locations to remove any spill.

- g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**
- h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?**
- i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?**

No Impact (Responses g – i). According to the San Luis Obispo County Flood Hazard Map, the project site is located within a flood hazard area and/or a 100-year floodplain. However, the

project does not involve construction of residential or other structures and would not occur during the most likely time for a flood event to occur (e.g., rainy season).

j. Result in inundation by seiche, tsunami, or mudflow?

No Impact. The project is located in an area that could be subject to inundation by tsunamis; however, the event is of very short duration and would not cause an increase in visitor use limits at the park. In the unlikely event of a tsunami, an emergency response plan is in effect for the County.

3.10 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.10.1 Discussion

Would the proposed project:

a. Physically divide an established community?

No Impact. There is no established community within the project area.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. Motorized recreation is a legal use allowed by the park's General Development Plan (CDPR 1975) and San Luis Obispo County's Local Coastal Plan (LCP; San Luis Obispo County 2009, 2007, 1989). The number of vehicles permissible on Pismo State Beach/Oceano Dunes SVRA is established by CDP 4-82-300-A5 issued by the California Coastal Commission (CCC 2001). The proposed Race of Gentlemen event would have up to 120 participating vehicles and would not substantially increase the number of vehicles on the beach. Permitted limits as specified by the CDP would remain in effect.

CDPR enforces a vehicle speed limit of 15 mph along the shoreline in accordance with the 1975 General Development Plan for Pismo State Beach and Oceano Dunes SVRA. The Race of Gentlemen special event would increase the speed of vehicles traveling along the shoreline above the 15 mph speed limit strictly within the 660-foot length of the enclosed race course. Maximum racing speeds at the finish line would reach between 40 mph for cars and 50 mph for motorcycles dependent upon the vehicle class, although the majority of vehicles would not attain these speeds.

The purpose of the 15 mph speed limit on the state beach is to provide public safety and protection of shoreline birds that may be present. To prevent public safety and natural resource impacts, the race event would be confined to a designated area controlled by fencing and monitoring. Resource monitors would be placed along the 1,500 feet of race course, pit, and turnaround area to ensure that no shoreline birds are present and in danger of vehicle collision. Speed above the 15 mph limit would only occur within the designated race area; the 15 mph speed limit would otherwise remain in effect. CDPR staff or the event sponsor may shorten the course to reduce speeds if deemed necessary for public safety, resource protection, or other operational considerations as specified in the Special Event Permit conditions (Section 2.5).

With these avoidance measures in place, the temporal increase in vehicle speed on the beach would not cause a significant conflict with any applicable plans.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The project site is not located in an area covered by an HCP or natural community conservation plan. An HCP is being developed for Pismo State Beach/Oceano Dunes SVRA; however, it has not yet been finalized.

Sources:

California Coastal Commission (CCC). Coastal Development Permit Amendment 4-82-300-A5, issued May 2001.

California Department of Parks and Recreation. 1975. Pismo State Beach and Pismo Dunes State Vehicular Recreation Area General Development Plan and Resource Management Plan. April.

San Luis Obispo County. 2009. Coastal Zone Land Use Ordinance, Title 23 Of The San Luis Obispo County Code. Revised January 2009.

_____ 2007. South County-Coastal Planning Area Rural Land Use Category Map. Department of Planning and Building. Revised October 23, 2007.

_____ 1989. The Land Use and Circulation Elements of the San Luis Obispo County General Plan, South County Coastal. Adopted by the San Luis Obispo County Board of Supervisors March 1, 1988 - Resolution 88-115, Amended March 14, 1989.

3.11 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local -general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.11.1 Discussion

Would the proposed project:

- a. **Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**
- b. **Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?**

No Impact (Responses a – b). No locally important mineral resources are designated at this site in the San Luis Obispo County General Plan. The proposed special event would not affect any known mineral resources of regional or local importance.

3.12 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project result in:</i>				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.12.1 Discussion

Would the proposed project:

- a. Expose persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

No Impact. The event would not result in additional street legal vehicles or spectators within Pismo State Beach or Oceano Dunes SVRA beyond the current use limits. All sound restrictions governing vehicles and amplified sounds within the North Beach Campground for the Friday night welcome gathering and within the race event area for the vehicle races and the beach party activities would be subject to special event restrictions specified in Project Description, Section 2.5. The races will be loud with vehicles that emit more noise than is typical for the street legal vehicles normally driving just south of Grand Avenue, but the additional noise would be temporary. There are no noise sensitive receptors located near the event area (Figure 1) that would be impacted by noise from race vehicles, spectators, or amplified sound from the beach party.

- b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

No Impact. The proposed event would not generate or expose people to excessive ground borne vibration or ground borne noise levels. Groundborne vibration or groundborne noise

levels are typically caused by blasting or pile driving. No blasting, pile driving, or similar activities would be required to erect temporary event structures.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

No Impact. The event is temporary and would not generate substantial noise or create a permanent source of noise.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The Race of Gentlemen special event would involve up to 8,000 spectators and 120 race participants. Overnight camping for the event would occur at the Pismo State Beach North Beach Campground. Event organizers propose to reserve the entire campground October 13-16, 2016, and all 103 campground spaces would only be available to visitors with an event pass for camping. This would ensure that individuals in the campground would be intentionally participating in the special event and would not be disturbed by noise generated from event activities and other camping spectators. All visitor use limits established by Pismo State Beach's existing Coastal Development Permit Amendment (CDP 4-82-300-A5) would remain in effect during this event. Day use street-legal vehicles are limited to 2,580. All spectators and their non-competition vehicles would be subject to the same noise restrictions as other Pismo State Beach visitors. There is no limit to the number of pedestrian visitors. Although pedestrian visitation would be higher than for an average fall weekend, the pedestrian numbers would be closer to the number reached during a typical Fourth of July weekend. It would thus not result in a substantial increase above prior visitor levels and therefore would not result in a substantial increase in noise levels experienced at the park.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The nearest airport to the project site is the Oceano County Airport, located over one mile south of the event. The project would not expose people to excessive noise levels associated with use of the Oceano County Airport.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The proposed project is not within the vicinity of a private airstrip.

Sources:

California Coastal Commission. Coastal Development Permit Amendment 4-82-300-A5, issued May 2001.

California Department of Parks and Recreation. 1975. Pismo State Beach and Pismo Dunes State Vehicular Recreation Area General Development Plan and Resource Management Plan. April.

3.13 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.13.1 Discussion

Would the proposed project:

- a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

No Impact. The project would not induce population growth in Grover Beach or its environs. The project consists of a temporary event to be held on two days within Pismo State Beach. No permanent population or housing would be generated as a result of the special event. The event would not add any new permanent residents to the area.

- b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?**
- c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

No Impact (Responses b – c). The project would not affect existing housing; there is no housing at the project site. The closest residence is over one mile from the project site.

3.14 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i) Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.14.1 Discussion

Would the proposed project:

- a. **Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:**

1. **Fire protection?**
2. **Police protection?**
3. **Schools?**
4. **Parks?**
5. **Other public facilities?**

No Impact. CDPR provides primary emergency response services within Pismo State Beach. The event would not create a permanent increase the need for fire or police protection services or create an adverse impact on such services. The Race of Gentlemen special event would hire law enforcement and medical personnel to staff the event as needed per recommendations of local agencies. The project would not result in an increased number of students served by local schools or affect other parks as it comprises a two-day special event at Pismo State Beach and would not bring in new residents. No new public facilities would be required to accommodate the event or event visitors.

3.15 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.15.1 Discussion

Would the proposed project:

- a. **Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

No Impact. The project would result in a two-day increase in visitor use of Pismo State Beach above a typical fall weekend. The event would not create increased use of nearby community parks in Grover Beach or generate demand for recreational facilities.

- b. **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. The project does not include recreational facilities beyond what already exist at Pismo State Beach or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. The erection of temporary structures associated with the event, such as spectator fencing, bleachers, vendor tents, and a stage on the beach would have no adverse effect on the environment.

3.16 TRANSPORTATION/TRAFFIC

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.16.1 Discussion

Would the proposed project:

- a. **Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?**
- b. **Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?**

Less than Significant Impact (Responses a – b). Event organizers estimate possibly 8,000 spectators may attend the event based on event history resulting in approximately 2,000

passenger vehicles coming into Grover Beach and parking in lots along Grand Avenue. The traffic control plan is presented in Section 2.3.5. The dirt lot on Grand Avenue would be used by event organizers for event admissions and vintage vehicle parking. The paved lot on Grand Avenue as well as private lots would be available for parking. Traffic flow and limited parking specifically for rideshare and other pickup and dropoff traffic would be accommodated via Le Sage Drive. Beach parking would be available for vehicles entering on Pier Avenue. No admission would be provided from the entrance kiosk at Grand Avenue. The beach entrance ramp at this location would be closed to vehicle traffic to avoid a traffic queue on Grand Avenue.

Signage directing vehicles to the event and to Oceano Dunes SVRA access would be posted on Grand and Pier Avenues. Signage would also be placed on State Route 1 in consultation with Caltrans. Proposed signage is identified in Table 1.

Traffic impacts associated with increased visitor use of Pismo State Beach would be short-term as visitors stagger arrival and departure throughout the two-day event. The temporary traffic impact would not conflict with local congestion management plans.

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The proposed special event would not affect air traffic patterns.

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact. The proposed special event is consistent with vehicle access at Pismo State Beach. The event organizers would use radio communications between drivers and spotters to ensure the race course is clear and safe before each vehicle race. Fencing would be erected to keep spectators at least 20 feet away from the race course for safety purposes. The vehicle speeds in excess of the 15 mph limit would be strictly limited to the designated race course and monitored by CDPR staff. The Race of Gentlemen would not create any traffic hazards.

The Friday night gathering at North Beach Campground could result in spill-over parking along State Route 1 impacting traffic movement near Monarch Grove. The Friday night gathering would be open to the public but not advertised. Members of the public who wish to attend would be directed to park in the Grand Avenue dirt lot and walk to the North Beach Campground via the boardwalk.

e. Result in inadequate emergency access?

No Impact. The proposed special event would not affect emergency access. All entrances are required to allow emergency vehicles access at any time.

f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. The proposed special event would not conflict with adopted alternative transportation policies. The event would not prevent pedestrians or cyclists from accessing Pismo State Beach.

3.17 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<i>Would the project:</i>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3.17.1 Discussion

Would the proposed project:

- a. **Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**
- b. **Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- c. **Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**
- d. **Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**
- e. **Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

No Impact (Responses a – e). No water uses are proposed that would exceed waste water treatment requirements. Additional portable toilet facilities would be brought in to the event area to adequately serve visitors. The project would not require construction of new or expanded water or wastewater treatment facilities. This project consists of a two-day special event taking place at the beach and in North Beach Campground and would not affect storm water drainage or facilities. No new water supplies or entitlements would be needed; there would be no expansion of existing water use associated with this project.

- f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**
- g. Comply with federal, state, and local statutes and regulations related to solid waste?**

No Impact (Responses f – g). The project consists of a two-day special event and would not result in new housing or businesses that would require permanent year-round garbage collection. Event organizers would be responsible for picking up all garbage, markers, and event banners following the event. They are also required to employ a zero waste organization to handle appropriate sorting and refuse removal. Additionally, no Styrofoam is allowed to be used. Garbage would be deposited in main dumpsters already maintained at Pismo State Beach, the number and capacity of which have been designed to accommodate users on a busy weekend. Pismo State Beach manages trash collection in compliance with all federal, state, and local laws and statutes.

3.18 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means the incremental effects of a project are considerable when viewed in connection with the efforts of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

3.18.1 Discussion

Would the proposed project:

- a. **Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Less Than Significant Impact. As discussed above, all participants would be paid camping or day use visitors, all vehicles would be subject to the same sound restrictions and equipment requirements applicable to all state beach visitors, all speed limit and other safety and resource-protective measures already in effect at the state beach would apply to event participants, and all pre-existing vehicle limits would remain in effect during the event. CDPR staff would monitor the event for compliance with Special Event Permit conditions and protection of natural resources. The proposed project would thus not substantially degrade the quality of the environment, significantly impact fish or wildlife species or their habitat, adversely affect plant or animal communities, or affect historic or other cultural resources.

- b. **Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means the incremental effects of a project are considerable when viewed in connection with the efforts of past projects, the effects of other current projects, and the effects of probable future projects)?**

No Impact. The project would not have environmental effects that are individually limited, but cumulatively considerable. The proposed event would be very short-term in duration and would not change usage at the SVRA during a busy summer weekend.

c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. The Race of Gentlemen event proposes vehicle activity on Pismo State Beach in an area designated for vehicle use. Any increase in noise or increase in PM10 emissions or greenhouse gas emissions resulting from the Race of Gentlemen vehicle activity would be negligible. The project would not have environmental effects that would cause substantial adverse effects on humans, either directly or indirectly.

Chapter 4 REPORT PREPARATION

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Phillip Gleason -- Analyst

Pismo State Beach
The Race of Gentlemen Special Event IS/ND

APPENDIX A

SPECIAL EVENT PERMIT TERMS AND CONDITIONS
California Department of Parks and Recreation

SPECIAL EVENT PERMIT TERMS AND CONDITIONS*

Special Event Permits, when approved, shall be issued subject to the following provisions:

1. All activities and arrangements for advance preparations within the above named unit, shall be at the direction of the District Superintendent or authorized representative.
2. Rules and regulations of the Department of Parks and Recreation unless specifically exempted or otherwise noted shall be observed by the permittee, employees, agents, or contractors.
3. The only special activities granted permittee herein are those which are listed in writing on the permit.
4. No structures or sets may be constructed unless specifically provided for and described in writing, no digging or excavation is permitted, and no shrubbery or trees are to be cut, trimmed or injured. No additions, alterations, modification, or decorations may be affixed to any Department of Parks and Recreation facility without specific written approval of the District Superintendent.
5. Fires will not be permitted except upon the specific written approval of the District Superintendent and under specific direction.
6. Vehicles under the authority of the permittee will be parked in areas designated by the District Superintendent.
7. Permittee will control all traffic and vehicles associated with the event as directed by the District Superintendent.
8. Permittee will maintain the permitted area in a clean and sanitary condition and will restore the area to the condition in which it was received to the satisfaction of the State.
9. Permittee will repair or be billed at the discretion of the State any and all damage to the park unit or any State property which was a result of permittee's activities. State will be the sole judge of the extent of damage and the extent of repairs required to remedy the damage. All repairs will be performed to the satisfaction of the State.
10. The State may require at its discretion, the following special conditions:
 - a) Fire control measures and additional firefighting equipment to be furnished by permittee as required by the District Superintendent.
 - b) First-aid service to be supplied by permittee, including ambulance service, doctors or nurses.
 - c) Additional police protection and/or traffic control personnel. Policing of the event will be provided by permittee and at own expense.
 - d) Parking arrangements required for permittee's operating personnel.
 - e) Additional sanitary facilities as required by the District Superintendent. Sanitary facilities over and above those furnished by State may be provided by permittee and at own expense.
 - f) The permittee will be charged a fee based on the number of hours and job classification of State personnel required to meet any special condition.

All special conditions and associated fees will be listed on the permit.

11. Unless otherwise specified on the Special Event Permit, the State agrees to provide the following services, if available or appropriate.

- a) Maintain public restrooms.
 - b) Provide fresh water.
 - c) Provide electricity.
 - d) Provide garbage cans and remove refuse.
 - e) Clean all areas prior to occupancy by permittee.
12. The interest of permittee created by this agreement may be subject to property taxation. Permittee agrees to pay any possessory interest tax or any other tax levied on such interest and to indemnify the State from any damage or loss arising, by reason of such tax or Revenue Taxation Code Section 107.6.
 13. Permittee may be charged a permit fee in addition to normal park fees, based on costs incurred by the State, size and scope of the event, and prevailing fees for commercial facilities in the locality.
 14. Depending on circumstances and probability of occurrence, permittee may be charged a damage deposit as determined by the District Superintendent. Costs for damage repair and any fines or penalties for noncompliance with permit conditions will be deducted from this deposit, The District Superintendent shall determine if all or only a portion of the deposit is refundable.
 15. The District Superintendent may terminate without prior notice any special event activity when it is necessary for the safety and enjoyment of the public for the protection of resources, or for violation of any rules or regulations of the Department of Parks and Recreation or conditions of this permit. In addition, any Special Event Permit may be cancelled without notice in the event of disaster or unforeseen emergency.
 16. It is an express condition of this permit that the State, its officers, agents and employees shall be free from any and all liabilities and claims for damages and/or suit for or by reason of any death of or injury or injuries to any person or persons or damages to property of any kind whatsoever, whether the person or property of permittee. its agents or employees, or third persons, from any cause or causes whatsoever while in or upon said premises or any part thereof during the term of this permit or occasioned by any occupancy or use of said premises or any activity carried on by permittee in connection therewith; and permittee hereby covenants and agrees to indemnify and to save harmless the State, its officers, agents and employees from all liabilities charges, expenses (including counsel fees) and costs on account of or by reason of any such deaths, injury, liabilities, claims, suits, or losses however occurring or damage growing out of same.
 17. For events having greater potential hazard or liability to the State than is incurred through typical daily park activities, permittee will be required to provide the District Superintendent with a certificate of insurance with required endorsements as proof of liability insurance coverage. The policy will cover the period of the permit and will be in an amount no less than one of the following as determined by the District Superintendent:
 - o Public Liability \$300,000 each person, \$500,000 each occurrence. Property Damage Liability and Products Damage Liability \$200,000; OR
 - o Combined single limit (CSL) \$500,000 per occurrence; OR
 - o Combined single limit (CSL) \$1,000,000 per occurrence.

Insurance policies shall be underwritten to the satisfaction of the State and shall contain the following special endorsement:

State of California, its officers, employees, and servants are included as additional insured but only insofar as operations under this contract or permit are concerned;

The insurer will not cancel or reduce the insured's coverage during the period that this permit is in effect or without 30 days prior written notice, whichever is shorter, to State.

This cancellation provision shall not be construed in derogation of the duty of the permittee to furnish insurance during the entire term of the permit.

18. Contacts relating to the insurance policy and payment of fee and in regard to the permit generally may be made through the District Superintendent.

**Source: DPR Form 246, Special Event Permit Application*

Pismo State Beach
The Race of Gentlemen Special Event IS/ND

APPENDIX B

SPECIAL-STATUS SPECIES LIST
MIG|TRA

Special-Status Species with Potential to Occur within the Project Site

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Invertebrates			
Mimic tryonia (california brackishwater snail) <i>Tryonia imitator</i>	-	Inhabits coastal lagoons, estuaries and salt marshes, from Sonoma County south to San Diego County. Found only in permanently submerged areas in a variety of sediment types; able to withstand a wide range of salinities.	None. No habitat within project site, no occurrences of the species within or immediately adjacent to the project site.
Globose dune beetle <i>Coelus globosus</i>	-	Inhabits foredunes and sand hummocks immediately bordering the coast from Bodega Bay head to Ensenada, Baja California, and all of the Channel Islands except San Clemente Island.	Low. Any potential habitat within project site is highly degraded; the only known occurrence near the project site is considered to be "possibility extirpated" per the CNDDDB.
White sand bear scarab beetle <i>Lichnanthe albipilosa</i>	-	Inhabits coastal sand dunes of San Luis Obispo County, in the vicinity of Dune Lakes. Found hovering close to the surface of the dunes near the lake, but some distance from the surf.	Low. Any potential habitat within the project site is highly degraded; no known occurrences of the species within or immediately adjacent to the project site.
Oso Flaco robber fly <i>Ablautus schlingeri</i>	-	Sand dunes	Low. Any potential habitat within the project site is highly degraded.
Oso Flaco flightless moth <i>Areniscythis brachypteris</i>	-	Open, coastal sand dune slopes in San Luis Obispo County. Larvae live in tubes attached to buried, green parts of plants at the margin of the active, moving sand dunes.	Low. Any potential habitat within the project site is highly degraded; no known occurrences of the species within or immediately adjacent to the project site.

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Monarch butterfly <i>Danaus plexippus</i>	-	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	Moderate. Overwintering site at North Beach Campground; however, most butterflies do not arrive until late October/November.
Fish			
Steelhead - south/central California coast DPS <i>Oncorhynchus mykiss irideus</i>	FT, SSC	Fed listing refers to runs in coastal basins from the Pajaro River south to, but not including, the Santa Maria River.	None. No habitat present on or adjacent to event site.
Tidewater goby <i>Eucyclogobius newberryi</i>	FE, SSC	Brackish water habitats along the Calif. coast from Agua Hedionda Lagoon, San Diego Co. to the mouth of the Smith River. Found in shallow lagoons and lower stream reaches, they need fairly still but not stagnant water and high oxygen levels.	None. No habitat present on or adjacent to site.
Amphibians and Reptiles			
California red-legged frog <i>Rana draytonii</i>	FT, SSC	Lowlands and foothills in or near permanent sources of deep water with dense, shrubby, or emergent riparian vegetation. Requires 11-20 weeks of permanent water for larval development. Must have access to aestivation habitat.	None. Habitat is adjacent to site, but all project activities will occur well away from the habitat.
Southwestern pond turtle <i>Actinemys marmorata pallida</i>	SSC	Permanent or nearly permanent bodies of water in many habitat types; below 6,000 ft. elev. Require basking sites such as partially submerged logs, vegetation mats, or open mud banks. Need suitable nesting sites.	None. Habitat is adjacent to site but all project activities will occur well away from the habitat.

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Coast horned lizard <i>Phrynosoma blainvilli</i>	SSC	Frequents a wide variety of habitats, most common in lowlands along sandy washes with scattered low bushes. Open areas for sunning, bushes for cover, patches of loose soil for burial, and abundant supply of ants and other insects.	Low. No habitat within project site, no known occurrences of the species within or immediately adjacent to the project site; however, suitable habitat exists adjacent to the site.
Silvery legless lizard <i>Anniella pulchra pulchra</i>	SSC	Loose soils of beach, chaparral, pine-oak woodland, and streamside growth of sycamores, cottonwoods, and oaks. Burrows in dune sand of beaches, washes, and loose soil near bases of slopes and near streams. Forages in leaf litter by day.	None. No habitat within project site due to ongoing disturbance; no occurrences of the species within or immediately adjacent to the project site.
Birds			
Sharp-shinned hawk <i>Accipiter striatus</i>	-	Ponderosa pine, black oak, riparian deciduous, mixed conifer, and Jeffrey pine habitats. Prefers riparian areas. North-facing slopes with plucking perches are critical requirements. Nests usually within 275 ft. of water.	None. Mature trees are not present on site.
California black rail <i>Laterallus jamaicensis coturniculus</i>	ST, SP	Inhabits freshwater marshes, wet meadows, and shallow margins of saltwater marshes bordering larger bays. Needs water depth of about 1 inch that does not fluctuate during the year and dense vegetation for nesting habitat.	None. No habitat within project site; no occurrences of the species within or immediately adjacent to the project site.

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Western snowy plover <i>Charadrius alexandrinus nivosus</i>	FT, SSC	Sandy beaches, salt pond levees, and shores of large alkali lakes. Needs sandy, gravelly, or friable soils for nesting.	Moderate. Species uses portions of the park for nesting and foraging. A comprehensive plover/tern management plan minimizes impacts from park users.
California least tern <i>Sternula antillarum brownii</i>	FE, SE, SP	Nests along the coast from San Francisco Bay south to northern Baja California. Colonial breeder on bare or sparsely vegetated, flat substrates: sand beaches, alkali flats, landfills, or paved areas.	Low. Event dates are outside of the period during which species is present along the Central Coast. Species uses portions of the park for nesting and foraging April-September and winters in Central and South America. Over the past decade, none have been observed in or near the project area in October.
California brown pelican <i>Pelecanus occidentalis californicus</i>	SP	California brown pelicans usually rest on water or inaccessible rocks (either offshore or on mainland), but also use mudflats, sandy beaches, wharfs, and jetties.	Breeding: None. There are currently no California brown pelican breeding colonies within the project area. Foraging: None. Brown pelicans feed offshore over open water. Roosting: Brown pelicans become fairly common on the beaches throughout the project area after the breeding season from June through October.
Mammals			
American badger <i>Taxidea taxus</i>	SSC	Commonly found in treeless areas including tallgrass and shortgrass prairies, grass-dominated meadows and fields within forested habitats, and shrub-steppe communities.	Low. No habitat within project site, no occurrences of the species within or immediately adjacent to the project site.
Townsend's big-eared bat <i>Corynorhinus townsendii</i>	Candidate FT	Uses a variety of habitats almost always near caves or other roosting areas near pine forests and scrub habitats.	None. No on-site habitat exists and no occurrences of the species are known within the project site.

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Plants			
Hoover's bent grass <i>Agrostis hooveri</i>	CRPR 1B.2	Closed cone coniferous forest, chaparral, cismontane woodland or valley and foothill grassland usually on sandy soils. 6-610 m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
Santa Margarita manzanita <i>Arctostaphylos pilosula</i>	CRPR 1B.2	Broadleafed upland forest, closed-cone coniferous forest, chaparral cismontane woodland. 75-1100m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
Marsh sandwort <i>Arenaria paludicola</i>	FE, SE, CRPR 1B.1	Marshes and swamps. Found growing up through dense mats of <i>Typha</i> , <i>Juncus</i> , <i>Scirpus</i> , etc. in freshwater marsh. 10-170m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
San Luis mariposa-lily <i>Calochortus obispoensis</i>	CRPR 1B.2	Chaparral, cismontane woodland, coastal scrub, valley and foothill grassland often on serpentine soils. 50-730m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
San Luis Obispo owl's clover <i>Castilleja densiflora</i> var. <i>obispoensis</i>	CRPR 1B.2	Meadows and seeps, valley and foothill grasslands; often on serpentine soils. 10-430m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
Coastal goosefoot <i>Chenopodium littoreum</i>	CRPR 1B.2	Coastal dunes. 10-30m.	Low. Project area subject to routine disturbance; no habitat within project site, no occurrences of the species within or immediately adjacent to the project site; however, suitable habitat exists adjacent to the site.
Brewer's spineflower <i>Chorizanthe breweri</i>	CRPR 1B.3	Closed-cone coniferous forest, chaparral cismontane woodland, coastal scrub on serpentinite, rocky, or gravelly soils. 45-800m	None. No on-site habitat exists and no occurrences of the species are known within the project site.
Straight-awned spineflower <i>Chorizanthe rectispina</i>	CRPR 1B.3	Chaparral, cismontane woodland, coastal scrub. 85-1035m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Surf thistle <i>Cirsium rothophilum</i>	ST, CRPR 1B.2	Coastal dunes, coastal bluff scrub. Open areas in central dune scrub; usually in coastal dunes. 3-60m.	None. Project area subject to routine disturbance; no habitat within project site, no occurrences of the species within or immediately adjacent to the project site.
La Graciosa thistle <i>Cirsium scariosum</i> var. <i>loncholepis</i>	FE, ST, CRPR 1B.1	Coastal dunes, brackish marshes, riparian scrub. Lake edges, riverbanks, other wetlands; often in dune areas. 5-185m.	None. Project area subject to routine disturbance; no habitat within project site, no occurrences of the species within or immediately adjacent to the project site. The event areas are not included within the proposed critical habitat for this species.
California saw-grass <i>Cladium californicum</i>	CRPR 2.2	Freshwater and alkali marshes, seeps. Freshwater or alkaline moist habitats. 60-600m.	None. No habitat within project site, no occurrences of the species within or immediately adjacent to the project site; however, suitable habitat exists adjacent to the site.
Pismo clarkia <i>Clarkia speciosa</i> ssp. <i>immaculata</i>	FE, CRPR 1b.1	Chaparral, cismontane woodland, valley and foothill grassland. On ancient sand dunes not far from the coast. Sandy soils, openings. 25-185m.	None. No habitat present on or adjacent to site.
Dune larkspur <i>Delphinium parryi</i> ssp. <i>blochmaniae</i>	CRPR 1B.2	Chaparral, coastal dunes (maritime). On rocky areas and dunes. 30-375m.	Low. Project area subject to routine disturbance; no habitat within project site, no occurrences of the species within or immediately adjacent to the project site; however, suitable habitat exists adjacent to the site.
Beach spectaclepod <i>Dithyrea maritima</i>	ST, CRPR 1B.1	Coastal dunes, coastal scrub. Formerly more widespread in coastal habitats in so. Calif. seashores, on sand dunes, and sandy places near the shore. 3-50m.	Low. On-site habitat is highly degraded and subject to routine disturbance, but occurrences of species have been recorded very near the project site.
Blochman's leafy daisy <i>Erigeron blochmaniae</i>	CRPR 1B.2	Coastal dunes. Sand dunes and hills. 3-185m.	Low. On-site habitat is highly degraded and subject to routine disturbance, but occurrences of species have been recorded very near the project site.

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Indian Knob mountainbalm <i>Eriodictyon altissimum</i>	FE, SE, CRPR 1B.1	Chaparral (maritime), cismontane woodland, coastal scrub on sandstone soils. 80-270m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
Mesa horkelia <i>Horkelia cuneata</i> var. <i>puberula</i>	CRPR 1B.1	Chaparral (maritime), cismontane woodland, coastal scrub. 70-810m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
San Luis Obispo County lupine <i>Lupinus ludovicianus</i>	CRPR 1B.2	Chaparral, cismontane woodland. 50-525m.	None. No on-site habitat exists and no occurrences of the species are known within the project site.
Nipomo Mesa lupine <i>Lupinus nipomensis</i>	FE, SE, CRPR 1B.1	Coastal dunes. Dry sandy flats, restricted to back dunes, assoc. with central dune scrub habitat. 10-50m.	Low. Project area subject to routine disturbance; no habitat within project site, no occurrences of the species within or immediately adjacent to the project site.
Crisp monardella <i>Monardella crispera</i>	CRPR 1B.2	Coastal dunes, coastal scrub. Often on the borders of open, sand areas, usually adjacent to typical backdune scrub vegetation. 5-120m.	Low. No habitat within project site, no occurrences of the species within or immediately adjacent to the project site; however, suitable habitat exists adjacent to the site.
San Luis Obispo monardella <i>Monardella frutescens</i>	CRPR 1B.2	Coastal dunes, coastal scrub. Stabilized sand of the immediate coast. 10-100m.	Low. No habitat within project site, no occurrences of the species within or immediately adjacent to the project site; however, suitable habitat exists adjacent to the site.
Gambel's water cress <i>Nasturtium gambelii</i>	FE, ST, CRPR 1B.1	Marshes and swamps. Freshwater and brackish marshes at the margins of lakes and along streams, in or just above the water level. 5-1305m.	None. No habitat within project site, no occurrences of the species within or immediately adjacent to the project site.
Coast woolly-heads <i>Nemacaulis denudata</i> var. <i>denudata</i>	CRPR 1B.2	Coastal dunes. 0-100m.	Low. On-site habitat is highly degraded, subject to routine disturbance, and no occurrences near project site.

Common Name Scientific Name	Listing Status ¹	Habitat	Potential to Occur On Site
Black-flowered figwort <i>Scrophularia atrata</i>	CRPR 1B.2	Closed-cone coniferous forest, chaparral, coastal dunes, coastal scrub, riparian scrub. Sand, diatomaceous shales, and soils derived from other parent material; around swales and in sand dunes. 10-250m.	None. No habitat present on or adjacent to site.
San Bernardino aster <i>Symphotrichum defoliatum</i>	CRPR 1B.2	Meadows and seeps, marshes and swamps, coastal scrub, cismontane woodland, lower montane coniferous forest, grassland. Vernal mesic grassland or near ditches, streams, and springs; disturbed areas. 2-2040m.	Low. No habitat within project site, no occurrences of the species within or immediately adjacent to the project site; however, suitable habitat exists adjacent to the site.
¹ Listing Status Key: FE – Federal Endangered FT – Federal Threatened FC – Federal Candidate SE – State Endangered ST – State Threatened SC – State Candidate CSSC – Calif. Species of Special Concern SFP – State Fully Protected		California Rare Plant Rank: CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere. CRPR 2: Plants rare, threatened, or endangered in Calif. but common elsewhere. CRPR 3: More information about this plant needed (Review List). CRPR 4: Limited distribution (Watch List). CRPR Threat Code extensions and their meanings: .1 – Seriously endangered in California (over 80% of occurrences threatened / high degree and immediacy of threat) .2 – Fairly endangered in California (20-80% occurrences threatened) .3 – Not very endangered in California (<20% of occurrences threatened or no current threats known).	

Sources: California Natural Diversity Database (CNDDDB 2016), field observations, and local knowledge of Pismo State Beach Resource Ecology personnel.