3.0 IMPACT ANALYSIS

3.1 Analysis Methodology

In evaluating the PWP's potential impacts on the physical environment, State Parks employed the following analytical methodology:

Step 1: Incorporation of Avoidance and Minimization Measures (AMMs). The EIR incorporates AMMs identified in the proposed HCP as PWP components that are designed to minimize impacts to the existing environmental setting. As with the Habitat Conservation Plan, the PWP assumes normal Park operations including the application of AMMs to protect sensitive biological resources. The AMMs are not considered mitigation measures but rather resource protection measures that are part of the proposed HCP and therefore in turn the PWP. Thus, the application of these measures is considered prior to making a finding of significance for project impacts. For the purposes of this EIR, the AMMs apply mostly to biological resources (Chapter 7).

Step 2: Compliance with Applicable Laws, Ordinances, Statutes, and Regulations. The EIR presumes, unless specifically noted, that PWP management programs and Development Project have been and continue to be designed, constructed, operated, and maintained in accordance with the applicable requirements described in the regulatory setting discussion of the respective resource sections. The regulatory setting is not intended to be exhaustive; rather, it is intended to provide a summary of key regulatory requirements that materially affect the relationship between the PWP project's design, construction, operation, and maintenance and potential environmental impacts. Chapter 3, "The Plan," of Volume 1,"PWP" also includes a list of the specific design requirements that were used in the design of the PWP Development and Small Projects.

Step 3: Identification of Existing Physical Conditions. The EIR identifies the existing physical environmental conditions that exist in the PWP planning area that could change as a result of PWP implementation. For biological resources (Chapter 7) the EIR also relies heavily on the extensive biological resource information provided in the HCP EIR (CDPR 2020). For additional resource settings (such as cultural resources, recreation, etc.) Volume 2 provides extensive information on the existing conditions). The environmental setting generally reflects the physical environmental conditions of the PWP planning area as they existed at the time of publication of the Notice of Preparation (NOP). Existing park operations are part of the environmental setting, including visitor use, visitor services, park operations and maintenance, and cultural and natural resource management. Any environmental impacts that may be associated with current park operations are part of the existing environmental setting and are therefore considered part of the baseline against which changes from PWP implementation are measured. Where applicable, State Parks has prepared CEQA documents for operations, resource protection and development of ongoing projects in the past. In accordance with CEQA Guidelines section 15125(a), the environmental setting describes only those physical environmental conditions necessary to understand the significant effects of the proposed PWP and its alternatives.

Step 4: Identification of EIR Scope. The EIR impact analysis includes the full range of environmental resource topics from Appendix G of the State CEQA Guidelines. Existing park operations are part of the existing physical setting of the PWP planning area and are baseline conditions for evaluating the proposed PWP and do not need to be

authorized. The PWP identifies both immediate and potential future management programs and Development Projects that would modify park operations (such as changes in use numbers) and cause a physical change to the environment (such as construction of Development Projects). The impacts associated with future activities are also assessed in the cumulative impacts to the degree that detail is known.

Step 5: Collection and Use of Data. The EIR analysis is based on the best available science and field survey data. State Parks has annually collected data on park resources and performed individual specialized studies, assisted by qualified professionals both in the public and private sector. State Parks has engaged with resource agencies (e.g., U.S. Fish and Wildlife Service [USFWS], CDFW, California Coastal Commission (CCC), and San Luis Obispo Air Pollution Control District [SLOAPCD]) and utilized a scientific advisory group comprised of agency representatives and environmental scientists during the course of the HCP preparation. These data have also been used for the environmental review contained in this PWP EIR, as applicable. Additional data was collected specifically in support of the PWP EIR. This includes site specific surveys for cultural resources, noise baseline measurements for the PWP Development Projects, and traffic counts. These data collection efforts are described in Volume 2 (cultural resources) or in the respective resource sections of this EIR.

Step 6: Analysis of Project Impacts. The EIR evaluates the significance of the PWP's potential impacts, (the change to the physical environmental conditions that could result from implementation of the PWP) on the full range of resources identified in Appendix G to the CEQA guidelines. Pursuant to CEQA Guidelines section 15126, this EIR analyzes the potential environmental impacts stemming from all aspects of PWP implementation including management programs and actions, and Development Projects and Small Projects as described in Chapter 3, "The Plan," of Volume 1. This examination is based on the incremental change to the existing physical conditions that would result from the implementation of the PWP and considers the public comments submitted by agencies and interested individuals during the 30-day public review period for the 2018 NOP (See Appendix A of this EIR for the Scoping Report including the NOP). The EIR's impact analyses consider the direct and indirect impacts of the proposed PWP, and enable State Parks to determine if the proposed HCP would have a beneficial impact, no impact, a less-than-significant impact, a potentially significant impact, or a significant and unavoidable impact to the environment.

Step 7: Inclusion of Mitigation Measures. Th is EIR describes the feasible mitigation measures proposed to avoid or minimize the PWP's significant impacts. Project mitigation measures are in addition to the standard and specific resource protection measures incorporated into the PWP as part of implementing State Park management programs, and generally require State Parks to avoid, prevent, or minimize impacts to resources, or – if impacts do occur – to rehabilitate, restore, or compensate for the impact in a manner that is proportional to the impact.

3.2 Impacts Found Not to be Significant

This EIR includes the full range of resource analysis. Please refer to the specific resource sections for impacts not found to be significant.

3.3 Cumulative Impacts

3.3.1 Introduction

CEQA Guidelines section 15130 requires that an EIR evaluate a project's cumulative impacts to determine if the project's incremental effect is cumulatively considerable. As defined in section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time" (14 CCR § 15355).

As set forth in the CEQA Guidelines, the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (14 CCR § 15130(b)). As stated in CEQA, "a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable" (PRC § 21083(b)). An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR (14 CCR § 15130(a)(1)). The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable (14 CCR § 15064(h)(4)). The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects that do not contribute to the cumulative impact (14 CCR § 15130(b)).

3.3.2 Geographic Scope

The geographic area that could be affected by the Pismo State Beach and Oceano Dunes SVRA PWP and its proposed projects varies depending upon the environmental resource being evaluated. The geographic scope of each resource is identified in the environmental and regulatory setting of each EIR chapter. Some resources, such as air quality, land use planning, and recreation, have a regional geographic scope. Other resources, such as cultural resources, have a localized geographic scope. Biological resources have both site-specific and regional geographic scopes, dependent upon the individual resource being evaluated.

3.3.3 Cumulative Project List

CEQA Guidelines (§ 15130(b)(1)(A)) allow for the use of a list of past, present, and reasonably foreseeable probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency for the cumulative impact analysis. The cumulative analysis includes projects that would result in similar impacts as the proposed PWP due to their potential to contribute collectively to significant cumulative impacts. Sources of information on past, present, and probable future projects include Oceano Dunes District staff and the websites for the planning or community development departments of San Luis Obispo County, the City of Pismo Beach, the City of Grover Beach, and the Oceano Community Services District. The projects considered for the cumulative impact analysis are identified in Table 3-1. The future PWP projects with specific known locations are shown in Figure 3-1

Potential Future PWP Projects. Other projects considered in this cumulative impact analysis are listed in Table 3-1.

As described in PWP Volume 1, State Parks is currently preparing a Habitat Conservation Plan (HCP) and Implementing a Dust Control Plan related to a Stipulated Abatement Order. The HCP is a long-range land use management plan for compliance with the Federal Endangered Species Act that is reviewed and approved by the U.S. Fish and Wildlife Service. The HCP includes a series of covered activities, including those listed in Table 3-1. The Dust Control Plan is a plan implemented to comply with the Stipulated Abatement Order. The other projects listed in Table 3-1 are projects in the vicinity of Pismo State Beach and Oceano Dunes SVRA that have recently been completed, are in the planning phase, are under construction, or are considered reasonably foreseeable. This includes projects reviewed and approved by federal agencies, other state agencies, and local agencies.

An “X” in Table 3-1 denotes which impacts from these projects could combine with the impacts identified for the proposed PWP actions and projects analyzed in this EIR to create a cumulative impact. These cumulative impacts are addressed at the end of each of the individual environmental resource chapters of this EIR.

Table 3-1a. List of Future Projects and their Potential for Cumulative Impacts with PWP Proposed Activities and Projects–Oceano Dunes District HCP Covered Activities – Potential Future Projects

Project Type	Location	Project Impact	Status
CA-12b SNPL Adult Banding	Oceano Dunes SVRA	Biological Resources	Potential Future
CA-15 Listed Plant Management - Propagation and Outplanting	Pismo State Beach and Oceano Dunes SVRA	Biological Resources	Potential Future
CA-28 Cable Fence Maintenance - Replacement	Oceano Dunes SVRA	Biological Resources	Potential Future
CA-38 Grover Beach Lodge and Conference Center (150-unit lodge and conference center)	Pismo State Beach. West end of Grand Ave. in Grover Beach	Air Quality Biological Resources Land Use Recreation	Approved in 2012 but not built
CA-41 Pismo Creek Estuary Seasonal (Floating) Bridge	Pismo State Beach. Near Pismo Coast Village RV Park in Pismo Beach	Biological Resources Recreation	Potential Future
CA-42 Riding in 40 Acres (OHV trail)	Oceano Dunes SVRA. East of Boneyard near Oso Flaco Lake	Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Recreation	Tentative. State Parks is exploring options
CA-43 Replacement of the Safety and Education Center	Oceano Dunes SVRA. Near Post 4	Air Quality Biological Resources Recreation	Potential Future
CA-44 Dust Control Activities – New PMRP	Oceano Dunes SVRA.	Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Land Use	Active Planning. Draft Plan released June 2019.

Project Type	Location	Project Impact	Status
		Recreation	
CA-48 Oso Flaco Lake Boardwalk Replacement	Oceano Dunes SVRA. Oso Flaco Lake	Biological Resources Cultural Resources and Tribal Cultural Resources Recreation	Potential Future
CA-49 Special Projects	Pismo State Beach or Oceano Dunes SVRA	Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Recreation	Potential Future

Table 3-1b. List of Future Projects and their Potential for Cumulative Impacts with PWP Proposed Activities and Projects–Other Oceano District Projects

Project Type	Location	Project Impact	Status
Stipulated Abatement Order/Dust Control Plan	Oceano Dunes SVRA	Land Use and Planning Noise Recreation	In implementation phase
Natural Communities Conservation Plan	Oceano Dunes SVRA	Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Land Use Recreation	In conceptual stage

Table 3-1c. List of Future Projects and their Potential for Cumulative Impacts with PWP Proposed Activities and Projects–Other State Agencies

Project Type	Location	Project Impact	Status
Grover Beach Subsea Fiber Optic Cables Project; proposed by RTI approved by State Lands Commission and California Coastal Commission	Grover Beach	Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Greenhouse Gas Hazards and Hazardous Materials Hydrology and Water Quality Noise Recreation Transportation and Traffic	Under construction

Table 3-1d. List of Future Projects and their Potential for Cumulative Impacts with PWP Proposed Activities and Projects–U.S. Fish and Wildlife Service

Project Type	Location	Project Impact	Status
Guadalupe-Nipomo Dunes National Wildlife Refuge Final Comprehensive Conservation Plan	Guadalupe-Nipomo Dunes National Wildlife Refuge south of Oso Flaco Lake Natural Area	Biological Resources Recreation	Approved in 2016

Table 3-1e. List of Future Projects and their Potential for Cumulative Impacts with PWP Proposed Activities and Projects–Local Agencies

Project Type	Location	Project Impact	Status
Arroyo Grande Creek Channel Waterway Management Plan (sediment and vegetation removal, restoration)	Arroyo Grande Creek	Agriculture Biological Resources Hydrology and Water Quality	Approved in 2010
Central Coast Blue (injection well for tertiary treated wastewater)	City of Pismo Beach	Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Energy Greenhouse Gas Hazards and Hazardous Materials Hydrology and Water Quality Land Use Noise Transportation and Traffic	Draft EIR 7/17/2020
Inn at the Pier	City of Pismo Beach	Air Quality Geology, Soils, and Paleontological Resources Noise	Constructed in 2020 MND
The Tides Oceanview Inn	City of Pismo Beach	Aesthetics Air Quality Biological Resources Geology, Soils, and Paleontological Resources Hazards and Hazardous Materials Hydrology and Water Quality Noise	MND 11/5/2018

Project Type	Location	Project Impact	Status
Grover Beach Lodge (proposed hotel adjacent to Park)	City of Grover Beach (also see HCP above)	Air Quality Biological Resources Land Use Recreation	Approved in 2012 but not built
Northeast Grover Beach Mixed-Use Development Plan	City of Grover Beach	Aesthetics Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Geology, Soils, and Paleontological Resources Hazards and Hazardous Materials Hydrology and Water Quality Noise Public Services Utilities and Service Systems Transportation and Traffic	MND 6/12/2019
Harbor Terrace Campground (campground)	Avila Beach, proposed by Port San Luis Harbor District	Aesthetics Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Geology, Soils, and Paleontological Resources Greenhouse Gas Hazards and Hazardous Materials Noise Transportation and Traffic	Under construction as of 2020; impacts on aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas, hazards, noise, transportation and traffic

Project Type	Location	Project Impact	Status
Arroyo Grande Creek HCP (dam operation)	San Luis Obispo County	Biological Resources Cultural Resources and Tribal Cultural Resources Hydrology and Water Quality	
DJ Farms/Pasadera - Guadalupe Housing Development Project (800 homes)	City of Guadalupe, Santa Barbara County	Aesthetics Agriculture Air Quality Biological Resources Cultural Resources and Tribal Cultural Resources Geology, Soils, and Paleontological Resources Greenhouse Gas Hazards and Hazardous Materials Hydrology and Water Quality Noise Public Services Recreation Transportation and Traffic Utilities and Service Systems	Broke ground in 2018
Escalante Meadows (80 low-income apartments)	City of Guadalupe, Santa Barbara County	Air Quality Geology, Soils, and Paleontological Resources Noise	NOD 3/2/2020 MND
Nipomo Mesa Woodlands Development (957-acre mixed use)	Nipomo Mesa, County of San Luis Obispo	Aesthetics Agriculture Air Quality Biological Resources	EIR Addendums in 2016 and 2017 (1998 FEIR)

Project Type	Location	Project Impact	Status
		Cultural Resources and Tribal Cultural Resources Geology, Soils, and Paleontological Resources Hazards and Hazardous Materials Hydrology and Water Quality Noise Public Services Utilities and Service Systems Transportation and Traffic	

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