

4.15 Wildfire

4.15.1 Introduction

This section assesses the potential for the Project to result in significant adverse environmental impacts related to fire hazards and wildfires. Discussed are the physical and regulatory settings, the baseline for determining environmental impacts, the significance criteria used for determining environmental impacts, and potential impacts associated with the construction, demolition, including the transitional phase, and operation and maintenance at the Rodeo Refinery and Santa Maria Site.

The Project also includes the Pipeline Sites—four regional pipelines serving the Santa Maria Site and the Rodeo Refinery. The Santa Maria Site is connected to the Rodeo Refinery by approximately 200 miles of subterranean pipeline, crossing San Luis Obispo, Santa Barbara, Kern, Kings, Fresno, Merced, Stanislaus, San Joaquin, Alameda and Contra Costa Counties. Phillips 66 proposes to empty and clean the pipelines at existing maintenance access points and to decommission or sell them; they would not be excavated as part of this Project. No physical changes would occur. Therefore, the Pipeline Sites are not further addressed in this section.

4.15.2 Environmental Setting

4.15.2.1 *Regional Setting*

Contra Costa County

The Rodeo Refinery is in an unincorporated area of northwestern Contra Costa County. The Rodeo Refinery encompasses approximately 1,100 acres of land near the community of Rodeo and adjoins the shore of San Pablo Bay. Land uses in the region include extensive undeveloped land characterized by grasslands, scrub, and small pockets of trees, and a patchwork of developed areas including low-density and medium density residential, industrial and commercial uses.

San Luis Obispo County

The Santa Maria Site is in an unincorporated area of southern San Luis Obispo County just south of the City of Nipomo. Land uses in the region include extensive undeveloped land characterized by grasslands, scrub, and sand dunes, and, to the north and east, developed areas including low-density and medium density residential and commercial uses.

4.15.2.2 *Local Setting*

Rodeo Refinery

The Rodeo Refinery is in the Rodeo-Hercules Fire Protection Area (Contra Costa County 2010). The Rodeo Site, where construction and operation of the Project would occur, is the 495-acre active area west of I-80 where the Rodeo Refinery's facilities and equipment are located; the remaining 600+ acres of the Rodeo Refinery comprise undeveloped land and small developed areas that include the Carbon Plant and tank farm. According to CAL FIRE (2020), the Rodeo Site is in a CAL FIRE Local Responsibility Area, but the portion of the Rodeo Refinery east of I-80 where the Carbon Plant is located is in a moderate to high fire hazard severity zone in a CAL FIRE State Responsibility Area.

Santa Maria Site

The Project Site currently receives fire protection and paramedic service from CAL FIRE, a California state agency that functions as the San Luis Obispo County Fire Department under a contract with the County. Fire Station #22 (Mesa Fire Station) at 2391 Willow Road in Arroyo Grande, less than 0.5 mile away from the steam methane reformer, is the jurisdictional station ("first in") for the Project Site and has a 5-minute

response time. Station 22 staffs up to 25 firefighter personnel, including one Fire Captain, one Fire Apparatus Engineer, two licensed paramedics, and 25 paid call firefighters dispatched via radio pager (CAL FIRE 2021). The next closest station to the Project Site is Fire Station #20 (Nipomo Fire Station) at 450 Pioneer Avenue in Nipomo, which is approximately 8 miles away and has an eight-minute response time. Station 20 staffs up to 25 firefighter personnel, including one Fire Captain, one Fire Apparatus Engineer, two licensed paramedics, and 25 paid call firefighters dispatched via radio pager (CAL FIRE 2021).

The Santa Maria Site consists of approximately 240 developed acres, containing refinery equipment, storage tanks, and buildings, and another approximately 1360 acres of undeveloped grassland and scrub. Adjacent uses are largely agriculture and open space. The Santa Maria Site is in a high fire hazard severity zone of a State Responsibility Area (CAL FIRE 2020).

4.15.2.3 Regulatory Setting

State of California Regulations and Policy

Defensible Space for Fire Protection

State of California regulations regarding defensible space requirements are contained in PRC Section 4291 and California Government Code Section 51182. The PRC primarily directs the creation of defensible space in State Responsibility Areas, while the California Government Code sets the fuel-treatment requirements in local responsibility areas that are designated as very high hazard severity zones. Both codes generally include a requirement to maintain defensible space of 100 feet from each side and from the front and rear of structures but not beyond the property line except under specific circumstances.

State Board of Forestry and Fire Protection – 2018 Strategic Fire Plan

The Board of Forestry and Fire Protection (Board) developed and adopted the Strategic Fire Plan pursuant to the direction provided under PRC Sections 4114 and 4130 regarding fire protection plan development. The Board has used this plan since the 1930s and periodically updates it to reflect current and anticipated needs. The 2018 Strategic Fire Plan reflects CAL FIRE's focus on (1) fire prevention and suppression activities to protect lives, property, and ecosystem services and (2) natural-resource management to maintain the state's forests as a resilient carbon sink to meet California's climate change goals and to serve as important habitat for adaptation and mitigation. Additionally, the continued inclusive collaboration among local, state, federal, tribal, and private partners remains paramount to effectively manage toward a more fire-resilient wildland–urban interface and natural environment. Through government and community collaboration, the following goals are intended to enhance the protection of lives, property, and natural resources from wildland fire as well as to improve environmental resilience to wildland fire, all of which would apply to this Project:

1. Identify and evaluate wildland-fire hazards and recognize life, property, and natural resource assets at risk, including watershed, habitat, social, and other values of functioning ecosystems. Facilitate the collaborative development and sharing of all analyses and data collection across all ownerships for consistency in type and kind.
2. Promote and support local land-use planning processes as they relate to (a) protection of life, property, and natural resources from risks associated with wildland fire and (b) individual-landowner objectives and responsibilities.
3. Support and participate in the collaborative development and implementation of local, county, and regional plans that address fire protection and landowner objectives.
4. Increase fire-prevention awareness, knowledge, and actions implemented by individuals and communities to reduce human loss, property damage, and impacts to natural resources from wildland fires.

5. Integrate fire and fuels management practices with landowner/land manager priorities across jurisdictions.
6. Determine the level of resources necessary to effectively identify, plan, and implement fire prevention using adaptive management strategies.
7. Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
8. Implement post-fire assessments and programs for the protection of life, property, and natural-resource recovery.

Local Regulations

Contra Costa County General Plan

The Safety Element of the Contra Costa County General Plan (Contra Costa County 2010) provides a general overview of safety planning and resources related to wildfire risks. The plan acknowledges the risk of wildfires given the extensive grasslands and the dry-farming techniques in the county, and establishes policies and measures to reduce risks of wildfire to people and property.

San Luis Obispo County General Plan

The Safety Element of the San Luis Obispo County General Plan (San Luis Obispo County 2014) acknowledges the risk of wildfire in wildlands and the urban/wildland interface, and also that wildlands fires are a natural feature of much of the county's landscape. San Luis Obispo County closely coordinates its fire protection services and programs with the California Department of Forestry and Fire Protection (CAL FIRE) programs and resources. The plan establishes the goal of reducing development conflicts with fire risk, and several policies aimed at achieving that goal. These include establishing development guidelines, ensuring adequate equipment and staffing, and improving readiness and response metrics.

4.15.3 Significance Criteria

Based on CEQA Guidelines Section 15064.5 and CEQA Guidelines Appendix G, a project located in or near state responsibility areas or lands classified as very high fire hazard severity zones would cause adverse impacts related to wildfires if it would:

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

4.15.4 CEQA Baseline

Baseline conditions reflect the 2019 operation and maintenance of the Rodeo Refinery and Santa Maria Site as petroleum refineries, including operation and maintenance activities. The baseline setting also includes the applicable regulatory framework to protect environmental resources, which are described above.

4.15.5 Approach to Analysis

Continuing operation and maintenance of the Rodeo Refinery does not involve any new activities that could increase wildfire risk. No Project activities would take place outside the developed area of the refineries. Once the Santa Maria Refinery is demolished structures and personnel would no longer be present. Exposure of people and structures to significant wildfire risks associated with operation and maintenance would not be exacerbated. Therefore, operation and maintenance of the Project are not further addressed, and the focus of analysis is on construction of new facilities and demolition impacts.

The transitional phase of the Project does not involve activities that would increase wildfire risk above that identified for construction/demolition impacts. Therefore, the transitional phase is not further addressed.

4.15.6 Discussion of No Wildfire Impacts

Review and comparison of the setting circumstances and Project characteristics with each of the significance criteria stated above clearly shows that no direct or indirect wildfire impacts would result for items b. or d. The following discusses the reasoning supporting this conclusion:

A project located in or near state responsibility areas or lands classified as very high fire hazard severity zones would cause adverse impacts related to wildfires if it would:

- b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.*
- d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.*

Hillsides in the active area of the Rodeo Refinery have been subjected to extensive cut-and-fill modifications during construction activities in order to form level areas for the construction of tanks and refining equipment. Site-specific mapping has not identified landslide prone materials (Contra Costa County 1994). Demolition activities would occur within the developed portion of the Rodeo Refinery. In addition, Phillips 66 maintains a fire brigade that is staffed 24-hours per day, 365-days per year, which would continue to be implemented during construction and demolition.

Demolition activities would occur within the developed portion of the Santa Maria Site. At the site, slope gradients are predominantly gentle from extensive grading for refinery facilities. Due to the high infiltration rates of site soils, there is minimal runoff or flooding. Therefore the site is not in an area prone to landslides or flooding. In addition, Phillips 66 maintains a fire brigade that is staffed 24-hours per day, 365-days per year, which would continue to be implemented during demolition.

Since demolition would occur within the existing boundaries of the refineries limiting the potential for a wildland fire, the sites are not prone to landslides or flooding, and Phillips 66 maintains a fire brigade that would be available during demolition, people or structures would not be exposed to significant risks as a result of post-fire slope instability.

4.15.7 Direct and Indirect Impacts of the Proposed Project

Direct impacts result from land modification directly and immediately caused by the construction, operation, or maintenance of a facility. Indirect impacts also occur as a result of a specific project, but do not result from intentional ground disturbance. Common indirect impacts include erosion, vibration, unauthorized artifact collecting, and vandalism. The proposed Project entails ground disturbance construction and demolition activities at the Rodeo Refinery and Santa Maria Site.

Table 4.15-1 presents a summary of the potential tribal cultural resources impacts, as well as significance determinations for each impact.

Table 4.15-1. Summary of Impacts

Impact	Significance Determination		
	LTS	LTSM	SU
Impact 4.15-1. A project located in or near state responsibility areas or lands classified as very high fire hazard severity zones would cause adverse impacts related to wildfires if it would: a. Substantially impair an adopted emergency response plan or emergency evacuation plan;			
Rodeo Refinery and Santa Maria Site			
<i>Construction/Demolition, Transitional Phase^a</i>	✓		
Impact 4.15-2. A project located in or near state responsibility areas or lands classified as very high fire hazard severity zones would cause adverse impacts related to wildfires if it would: c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;			
Rodeo Refinery and Santa Maria Site			
<i>Construction/Demolition, Transitional Phase^a</i>	✓		

Notes: LTS = Less than significant, no mitigation proposed
LTSM = Less-than-significant impact with mitigation
SU = Significant and unavoidable

^a. Transitional phase applies only to Rodeo Refinery

IMPACT 4.15-1

A project located in or near state responsibility areas or lands classified as very high fire hazard severity zones would cause adverse impacts related to wildfires if it would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan.

Construction/Demolition: Less Than Significant, No Mitigation Proposed

Rodeo Refinery

According to CAL FIRE (2020), the Rodeo Site, where all unit modifications and additions would occur, is in a CAL FIRE Local Responsibility Area. However, the portion of the Rodeo Refinery east of I-80 (including the Carbon Plant) is in a moderate to high fire hazard severity zone in a CAL FIRE State Responsibility Area.

Sufficient emergency access is determined by factors such as number of access points, roadway width, and proximity to fire stations. The Rodeo Refinery, including the Carbon Plant, has several temporary/emergency vehicle access entrances on San Pablo Avenue, in addition to the main signalized entrance intersection with Refinery Road. There are multiple roadways that provide external access to the Rodeo Site and there are internal roadways within the refinery that also provide access for both general and emergency vehicles. In addition, as discussed in Section 4.13, *Transportation and Traffic*, as part of obtaining a Contra Costa County construction permit, Phillips 66 is required to implement a Traffic Control Plan, which would further minimize potential impacts.

Therefore, construction and demolition activities at the Rodeo Refinery would not impair an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

Santa Maria Site

The Santa Maria Site is located in a State Responsibility Area but is not located in or near an area classified as a very high fire hazard severity zone. As noted previously, sufficient emergency access is determined by factors such as number of access points, roadway width, and proximity to fire

stations. Access to the Santa Maria Site is via State Route 1, which is also called Mesa View Drive north of the site entrance and is called Willow Road east of the site entrance. There are multiple internal roadways within the refinery that provide access for both general and emergency vehicles. No Project activities would take place outside the developed area of the Santa Maria Site. In addition, as discussed in Section 4.13, *Transportation and Traffic*, as part of obtaining a San Luis Obispo County construction permit, Phillips 66 is required to implement a Traffic Control Plan, which would further minimize potential impacts.

Therefore, construction and demolition activities at the Santa Maria Site would not impair an adopted emergency response plan or emergency evacuation plan. The impact would be less than significant.

Mitigation Measure: None Required

IMPACT 4.15-2

A project located in or near state responsibility areas or lands classified as very high fire hazard severity zones would cause adverse impacts related to wildfires if it would:

- c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.***

Construction/Demolition: Less Than Significant, No Mitigation Proposed

Rodeo Refinery

Demolition of the Carbon Plant, which is surrounded by open space, would involve the temporary use of mechanical equipment that has the potential to ignite a fire. However, all demolition activities, including staging areas, would occur within the existing Carbon Plant and Rodeo Site boundaries. In addition, areas located in State Responsibility Areas, defensible space of 100 feet from structures must be maintained. Similarly, state regulations in local responsibility areas that are designated as very high hazard severity zones, requires that defensible space and fuel-treatment requirements must be met. Phillips 66 currently maintains these areas to minimize the potential for wildfire in accordance with state fire regulations, and would continue to do so during construction and demolition.

Phillips 66 also maintains a fire brigade that is staffed 24-hours per day, 365 days per year with a minimum of 15 people and has an emergency response plan in place. The emergency response plan ensures that in the event of a fire refinery personnel would be able to respond quickly and effectively so that personal injuries, environmental damage, and/or property damage can be minimized.

Therefore, construction and demolition activities at the Rodeo Refinery would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. The impact would be less than significant.

Santa Maria Site

The Santa Maria Site is located in a State Responsibility Area but is not located in or near an area classified as a very high fire hazard severity zone. Demolition of the Santa Maria Site, which is surrounded by open space, would involve the temporary use of mechanical equipment that has the potential to ignite a fire. However, all demolition activities, including staging areas, would occur within the existing Carbon Plant Site boundary. In addition, Phillips 66 currently maintains buffer areas as defensible space to minimize the potential for wildfire, and would continue to do so during demolition.

Phillips 66 also maintains a fire brigade that is staffed 24 hours per day, 365-days per year, and has an emergency response plan in place. The emergency response plan ensures that in the event of a fire refinery personnel would be able to respond quickly and effectively so that personal injuries, environmental damage, and/or property damage can be minimized.

Therefore, demolition activities at the Santa Maria Site would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. The impact would be less than significant.

Mitigation Measure: None Required

4.15.8 References

CAL FIRE. 2020. California Fire Hazard Severity Zone Viewer.

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