

**CALIFORNIA COASTAL COMMISSION**

South Coast Area Office  
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August 15, 2014

City of Newport Beach  
ATTN: Brenda Wisneski  
Post Office Box 1768  
Newport Beach, CA 92658

**Re: NOTICE OF INCOMPLETE APPLICATION**

Applicant: City of Newport Beach  
Location: Fire rings at Balboa Pier and Corona del Mar State Beach  
Newport Beach, Orange County

**Coastal Development Permit Application No. 5-14-1213**

Dear Ms. Wisneski:

The above referenced application was received on July 17, 2014. Coastal Commission staff has reviewed your application for a pilot program limiting fire ring fuel to charcoal for the 60 fire rings dispersed within the Balboa Pier area and Corona del Mar State Beach. Commission staff has determined that the submission is incomplete pending the receipt of the information requested below:

**1. PILOT PROGRAM DURATION**

Your application does not specify how long the proposed pilot program would be in place. Please describe the proposed duration of the pilot program, including proposed start and end dates.

**2. CHARCOAL AVAILABILITY**

Please describe how charcoal will be made available to fire ring users during the pilot program. For example, page 2 of the submitted Project Description states that the City will make free charcoal available "as funds permit." How much money has been allocated to providing free charcoal? What is the estimated quantity (number of bags) that will be made available? Over what time period? How many free bags of charcoal would be given out at each location per night? Where are the free charcoal locations, how are they staffed, and how is the public informed of the availability and location of free charcoal? During what hours is free charcoal available? Is there a limit to the number of bags given out per ring or per person? What type of charcoal has been and will be given away (lump or briquettes)? To expand the City's ability to provide free charcoal, have you considered approaching charcoal companies about donating charcoal for purposes of this pilot program? Will the City make charcoal available for purchase at Corona del Mar State Beach and in the Balboa Pier area? If the City does make charcoal available for purchase on-site, will there be a limit on the price charged?

**3. MONITORING EFFORTS TO DATE**

Please describe in more detail the efforts that the City has already undertaken to monitor compliance with the charcoal-only rule and its impacts on fire ring use. For example, how many staff has the City

dedicated to outreach and enforcement at Balboa Pier and Corona del Mar State Beach? What hours or frequency are they monitoring fire ring use at each location? What questions are staff asking fire ring users to generate the observations reported on page 3 of the Project Description? Are these informal conversations or are staff conducting a formal survey of fire ring users (i.e., with verbal or written questionnaire)? If there is a survey questionnaire, please submit a copy.

The application states that “[g]enerally the same numbers of people are using the fire rings as before the regulation and for the same approximate duration” (p. 3 of Project Description). Please provide the data collected to date regarding the numbers of people using the fire rings prior to and since implementation of the charcoal-only rule. Please describe how the City is collecting data on duration of fire ring use. For example, what time of day and how many times a day are staff counting fire rings in use? Does the City have any baseline data on average duration of use before the charcoal-only rule went into effect?

Is the City surveying fire ring users to find out whether their experience with charcoal is comparable to wood? What questions is the City asking fire ring users about their experience and about whether the charcoal-only rule is a deterrent to their use of the fire rings? If there is a survey questionnaire, please submit a copy.

Is the City collecting data on the numbers of people that leave the beaches after being educated about the charcoal-only rule on both days that free charcoal is available and days when free charcoal is not available to determine whether the charcoal-only rule is a deterrent to fire ring use?

Has the City conducted air quality monitoring to assess whether fire ring emissions have decreased since implementing the charcoal-only rule? If so, please describe the methodology and provide results. If no air quality monitoring has been conducted, please describe who will conduct this monitoring, how it will be done, and when this monitoring will begin.

The fire ring use count data collected by educational outreach staff members (reported on page 3 of the Project Description) does not include count data for Corona del Mar on Saturdays. Is that data being collected? If so, please provide those numbers. If this data is not being collected, please describe why it is not.

#### **4. IMPACTS OF CHARCOAL**

Did the City assess the potential air quality and health impacts associated with use of charcoal (both lump and briquettes) and starter products, including lighter fluid, compared to use of wood? If so, please provide copies of any scientific studies reviewed or staff presentations prepared on this topic.

#### **5. ALTERNATIVES**

Please provide detailed maps of the following:

- (1) the fire rings at each location as currently configured, with distances between fire rings clearly marked;
- (2) which fire rings, as currently configured, could be designated for wood burning in compliance with Rule 444;

- (3) how the fire rings at Corona del Mar State Beach and the Balboa Pier area could be reconfigured to comply with Rule 444's spacing requirements and allow wood burning; and
- (4) other beach uses occurring in the Balboa Pier area and at Corona del Mar State Beach.

## 6. PROPOSED MONITORING PROGRAM

Commission staff would like the City to consider expanding the proposed monitoring plan to include the following items:

- (1) Assess duration of use of charcoal-only fire rings and at a control site where wood burning is allowed;
- (2) Document use of lighter fluid at charcoal-only fire rings to understand whether lighter fluid is only used to start charcoal or is being used to maintain flames to approximate a wood fire;
- (3) Document the average number of bags of charcoal used at fire rings and the average duration of use;
- (4) Count the number of people leaving the beach areas after learning about the charcoal-only rule;
- (5) Track the dates and amount of free charcoal provided to fire ring users to compare use statistics when free charcoal is available and not available and to compare numbers of people without charcoal that are leaving the beach after learning about the charcoal-only rule;
- (6) Survey fire ring users to assess quality of fire ring experience at charcoal-only fire rings and at a control site where wood burning is allowed;
- (7) Document enforcement actions including number of warnings given and citations issued, as well as the reasons for warnings and citations (specifically, track warnings and citations issued for burning "natural wood" as defined in Ordinance No. 2014-2 vs. other banned substances like trash, furniture, treated wood, etc.);
- (8) Replicate or expand on the SCAQMD's air quality monitoring conducted March-May 2013.

If the City believes any of the above identified monitoring would not be possible, please describe the issues/concerns the City has and explain whether there are changes the City would recommend that would allow the monitoring (or variation on it) to occur.

Please do not limit your submittal to the above mentioned items. You may submit any information which you feel may help Commission staff gain a clear understanding of the scope of your project. Upon receipt of the requested materials we will proceed with determining the completeness of your application.

Thank you for your attention to these matters. We look forward to working with you. If you have any questions, you may contact me at (562) 590-5071.

Sincerely,



Erin Prahler  
Coastal Program Analyst