4.16 Transportation

This section describes the existing transportation facilities in the Project area. These transportation facilities include roadways, transit, rail corridors, waterways, and non-motorized transportation modes. This section also identifies laws and regulations applicable to transportation, identifies significance thresholds and assesses the Proposed Project's transportation impacts and their significance.

Scoping Comments Received. During the scoping comment period for the EIR, written and verbal comments were received from agencies, organizations, and the public. These comments identified various substantive issues and concerns relevant to the EIR analysis. Appendix B includes all comments received during the scoping comment period. The following list provides a summary of scoping comments applicable to this issue area and considered in preparing this section:

- Assess vehicle trips during decommissioning including the volume of truck traffic and describe what roads will be used.
- Assess use of roadways for heavy construction during any high traffic times.
- Analyze the range of impacts involving transportation and pedestrian safety and access.
- Study traffic circulation including traffic signals or other traffic control devices necessary to accommodate potential increase in truck hauling during decommissioning.
- Identify what type of trucks will be transporting the materials and specify how many a day would travel to each rail facility.
- Address hazards associated with transporting and storing nuclear waste including potential benefits of barge transportation over rail or roads.

4.16.1 Environmental Setting

4.16.1.1 Ground Transportation

Existing Regional Transportation System

As shown in Project Description Figure 2-1, US Route 101 (US-101), which generally runs in a north-south direction, provides the primary regional vehicular and truck access between the Diablo Canyon Power Plant (DCPP) and the Pismo Beach Railyard (PBR) or the Santa Maria Valley Railroad facility in unincorporated Santa Barbara County (SMVR-SB).

The region is served by a single, north-south rail line owned by the Union Pacific Railroad Company (UPRR); the rail corridor extends north towards San Francisco and south towards Los Angeles as the Santa Barbara Subdivision; on both ends the Subdivision connects with the larger Union Pacific and national freight railroad system. A rail connection to a shortline railroad, the Santa Maria Valley Railroad, extends east from the City of Guadalupe through unincorporated Santa Barbara County to the City of Santa Maria. Passenger rail along the north-south corridor is operated by Amtrak and includes the Coast Starlight, a once-daily long-distance train, and the Pacific Surfliner, which operates several roundtrips daily between San Luis Obispo and San Diego. Freight trains are active throughout the corridor, although the frequency and other characteristics of the freight service is unknown and subject to change per UPRR's customer needs and

business practices. As discussed in Section 1.3.3.2, *Surface Transportation Board*, construction activities at railroad facilities (e.g., SMVR-SB) and operations along rail lines are federally preempted.

Existing Street System

The existing roadway system includes the County of San Luis Obispo, County of Santa Barbara, City of Santa Maria, and City of Pismo Beach roadway networks. These roads include arterial and local streets that provide access to the Project sites off US-101. The following section details the roads affected by the Proposed Project in these jurisdictions. Street classifications for roadways are designated in each jurisdiction's respective General Plan.

County of San Luis Obispo

Street classifications are defined in the Land Use and Circulation Element of the County of San Luis Obispo General Plan, Framework for Planning (Inland) as follows (San Luis Obispo, 1980a):

- **Principal Arterial Roads:** A freeway, expressway, or principal county road that connects major population centers and other points of traffic generation. These roads have controlled access and are not intended for local trips.
- **Urban/Rural Arterial Road:** A road that carries traffic between principal arterial roads, centers of population, or carries large volumes of traffic within an urban or rural area. Arterials are not intended to provide primary access to residences and are best used for controlled access to areas of retail and service commercial uses, industrial facilities, and major community facilities.
- **Urban/Rural Collector Road:** A road that enables traffic to move to and from local roads, arterial roads, and activity centers. Collectors are the principal arterial of residential areas and often carry a relatively high volume of traffic. A collector also has the potential for sustaining minor retail establishments. Limits on residential driveway access should be based upon traffic volumes, parcel sizes and sight distances.
- **Local Road:** A road that is used primarily for access to adjacent property.
- **Grade Separation:** A crossing of two transportation routes at different levels such as two roads, or a road and a railroad.
- **Interchange:** A grade separation that includes ramps connecting the separated roadways to allow traffic to change between routes.

Roadways within San Luis Obispo County in the DCPP area include:

- Avila Beach Drive is an arterial road that runs through the unincorporated community of Avila Beach in an east-west direction. The road generally provides two travel lanes, with one lane in each direction. Avila Beach Drive runs from Port San Luis in the west to US-101 in the east. Avila Beach Drive provides a full access interchange to US-101 at Monte Road and Shell Beach Road. Avila Beach Drive is the only publicly-accessible road to the DCPP site, and is the only publicly-accessible road west of San Luis Bay Drive providing a direct connection to the Avila Beach community.

- San Luis Bay Drive is an arterial road that runs through the unincorporated community of Avila Beach, primarily in an east-west direction. The road generally provides two travel lanes, with one lane in each direction. San Luis Bay Drive runs from Avila Beach Drive in the west to US-101 in the east. San Luis Bay Drive provides a full access interchange to US-101 near Ontario Road.
- Intersecting streets between, but not connecting to, the DCPP site and US-101 include:
  - Babe Lane
  - Wild Cherry Canyon
  - Ana Bay Road
  - San Juan Street
  - San Miguel Street
  - San Luis Street
  - Cave Landing Road
  - San Luis Bay Drive
  - Ontario Road
  - Shell Beach Road
  - Monte Road
  - Bay Laurel Place
  - Apple Orchard Lane
  - Sparrow Street
  - See Canyon Road
  - Avila Valley Drive
  - Ontario Road

San Luis Obispo County does not have designated truck routes.

Existing transit services in the DCPP area (see Figure 4.16-1) include (SLO RTA, 2022a) (Amtrak, 2022):

- **Avila Beach Trolley.** The Avila Beach Trolley provides free transit services from Avila Beach to Pismo Beach, where it connects to SLO RTA (2022b) and South County Transit (SoCo Transit) services. The Avila Beach Trolley operates on weekends from July to September and runs on Avila Beach Drive, San Luis Bay Drive, and US-101.
- **Amtrak.** Amtrak provides a thruway bus service, Route 17, that operates on US-101 from Santa Barbara to the Bay Area and includes intermediary stops at Santa Maria, Grover Beach, and the San Luis Obispo Amtrak rail station. Route 17 offers eleven daily one-way trips. Riders must have a valid rail ticket to ride Amtrak thruway services, and tickets are not sold separately.

Existing and proposed bicycle facilities in the DCPP area (see Figure 4.16-2) include:

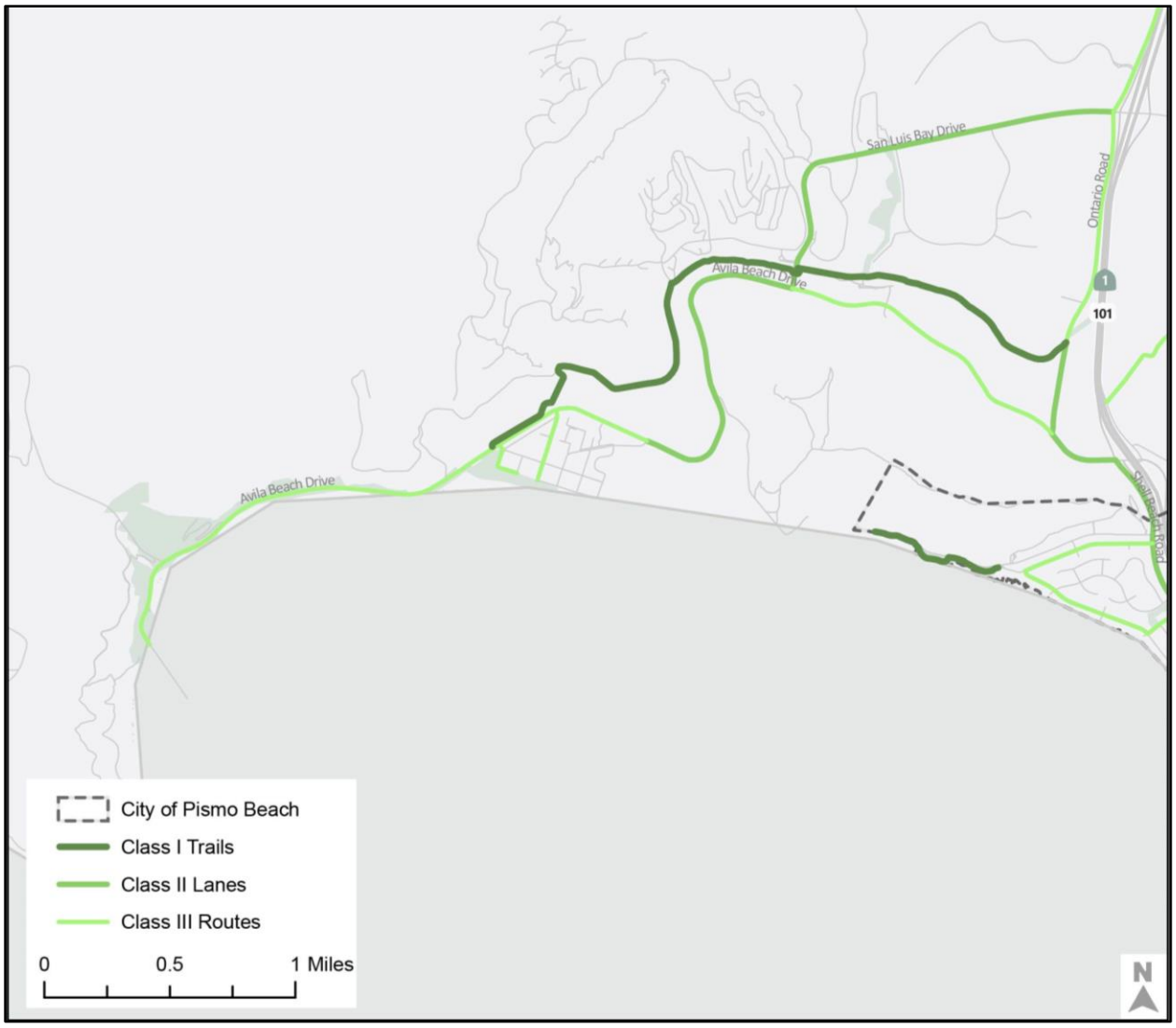
- Class I Bike Path – The Bob Jones Bike Trail runs from San Juan Street to Blue Heron Drive and parallels Avila Beach Drive for part of its route. The trail follows Blue Heron Drive and runs along San Luis Obispo Creek until it reaches the intersection of Ontario Road and US-101.
- Class II Bike Lanes on Avila Beach Drive – From San Luis Street to San Luis Bay Drive and from Ontario Road to Shell Beach Drive
- Class II Bike Lanes on San Luis Bay Drive – From Avila Beach Drive to Ontario Road and US-101
- Class III Bike Route on Avila Beach Drive – From Port San Luis Pier to San Luis Street, from San Luis Bay Drive to Ontario Road, and from Shell Beach Drive to Monte Road
- Class III Bike Route on San Luis Bay Drive – From Ontario Road to Monte Road

In addition to the Bob Jones Bike Trail, Avila Beach Drive includes sidewalks from the San Luis Creek Bridge to San Miguel Street, which provides pedestrian access in the area between the DCPP site and US-101.

Figure 4.16-1. Avila Beach Transit Services

Source: SLO RTA, 2022a; Amtrak, 2022

Figure 4.16-2. Avila Beach Bicycle Facilities



Source: San Luis Obispo, 2015.

City of Santa Maria

The Circulation Element of the City of Santa Maria General Plan (Santa Maria, 2011) categorizes streets on whether they emphasize mobility or access. Per the Circulation Element, "Mobility" means providing the ability for motorists to travel between their points of interest. Land access means providing access to properties at the final destination, which may include parking or driveway access. Street classifications are defined in the Circulation Element of the City of Santa Maria General Plan as follows:

- **Freeway:** Mobility, with no land access and limited access to primary arterial streets.
- **Primary Arterial:** Mobility, with intermittent access to arterials, other streets, and freeways and with minimal direct land access.
- **Secondary Arterial:** Mobility, with access to collectors, some local streets, and major traffic-generating land uses.

- **Collector:** Mixed, with access provided from local streets to arterials, and access also provided to some adjacent land uses.
- **Local:** Primary purpose is to provide access to collector streets.
- **Minor:** Land access, with access to local and collector streets.

Roadways within the City of Santa Maria used to access the SMVR-SB site include:

- Betteravia Road – Betteravia Road is a primary arterial road that runs through the City of Santa Maria in an east-west direction. The road generally provides six travel lanes, with three lanes in either direction, and a center lane for left turns. Betteravia Road runs from Simas Road in the west to Foxen Canyon Road and Philbric Road in the east. Betteravia Road provides a full access interchange to US-101 and provides direct access to the SMVR-SB site.

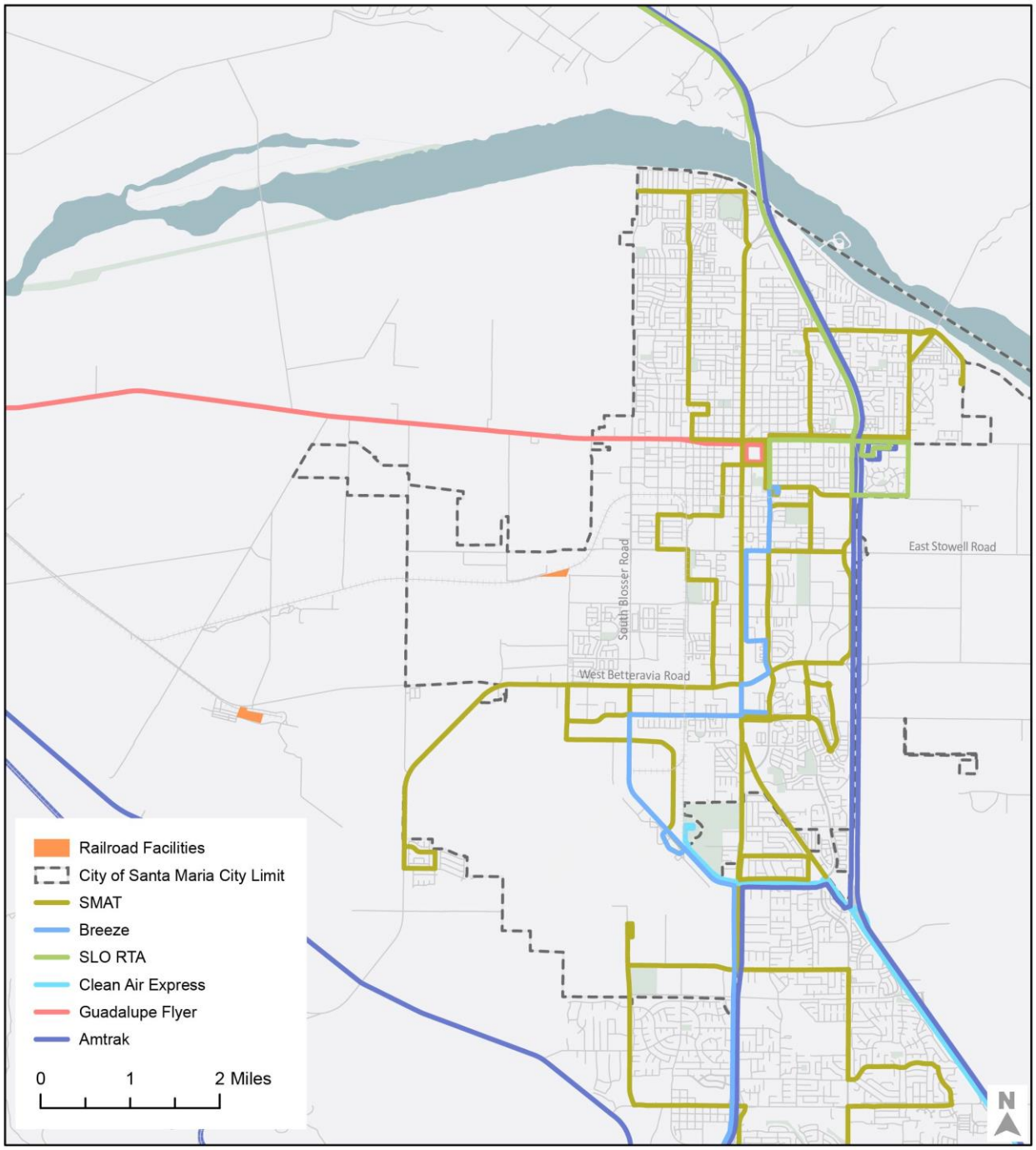
Truck routes within the City of Santa Maria include:

- Main Street
- Stowell Road
- Betteravia Road
- Clark Avenue

Transit services in the City of Santa Maria are provided by Santa Maria Area Transit (SMAT) and The Breeze Bus (Breeze) (see Figure 4.16-3). Several SMAT and Breeze bus routes operate along Betteravia Road (Amtrak, 2022) (Breeze Bus, 2022) (Santa Maria, 2022).

- **SMAT Route 2.** Route 2 operates along Betteravia Road for part of its route and provides transit services from the County Government Center to Taylor Street. Route 2 is primarily a north-south route that provides access to various destinations, including the Santa Maria Transit Center.
- **SMAT Route 4.** Route 4 operates along Stowell Road and Betteravia Road for part of its route and provides transit services from the Santa Maria Public Airport to the Edwards Community Center. Route 4 is primarily a north-south route that provides access to various destinations, including the Santa Maria Transit Center.
- **SMAT Routes 5 and 6.** Routes 5 and 6 operate along Betteravia Road for part of their route and provide transit service from the southern City of Santa Maria city limit to the Santa Maria Transit Center. Routes 5 and 6 are circular routes that provide access to various destinations, including Santa Maria High School and the County Government Center. Route 5 operates counterclockwise, and Route 6 operates in a clockwise direction along the same streets.
- **SMAT Route 8.** Route 8 operates eastbound along Betteravia Road for much of its route and provides transit services from Tanglewood Drive to the County Government Center. Route 8 is primarily an east-west route that provides access to various destinations, including the Santa Maria Police Station.

Figure 4.16-3. Santa Maria Transit Services



Source: Amtrak, 2022; Santa Maria, 2022; San Luis Obispo, 2015; Santa Barbara 2014; SMOOTH, 2022.

- **Breeze Route 100.** Route 100 operates along Stowell Road for part of its route and provides transit service from the Santa Maria Transit Center to the Lompoc Transit Center. Route 100 also operates along Betteravia Road to access the County Government Center on select runs. Route 100 is primarily a north-south route that provides access to Santa Maria Airport, Vandenberg Air Force Base, and Lompoc.

- **Amtrak.** In addition to Amtrak's thruway bus service, Route 17, which operates on US-101 from Santa Barbara to the Bay Area with an intermediate stop at the Santa Maria Transit Center, the Amtrak Pacific Surfliner and Coast Starlight rail services operates on Union Pacific tracks that parallel State Route 1 in the Santa Maria area.

Existing bicycle facilities between US-101 and the SMVR-SB site (see Figure 4.16-4) include:

- Class II Bike Lanes on Betteravia Road – From South Broadway (California State Route 135) to Philbric Road

Existing pedestrian facilities between US-101 and the SMVR-SB site include:

- Betteravia Road includes continuous sidewalks, on at least one side of the street, between US-101 and A Street.

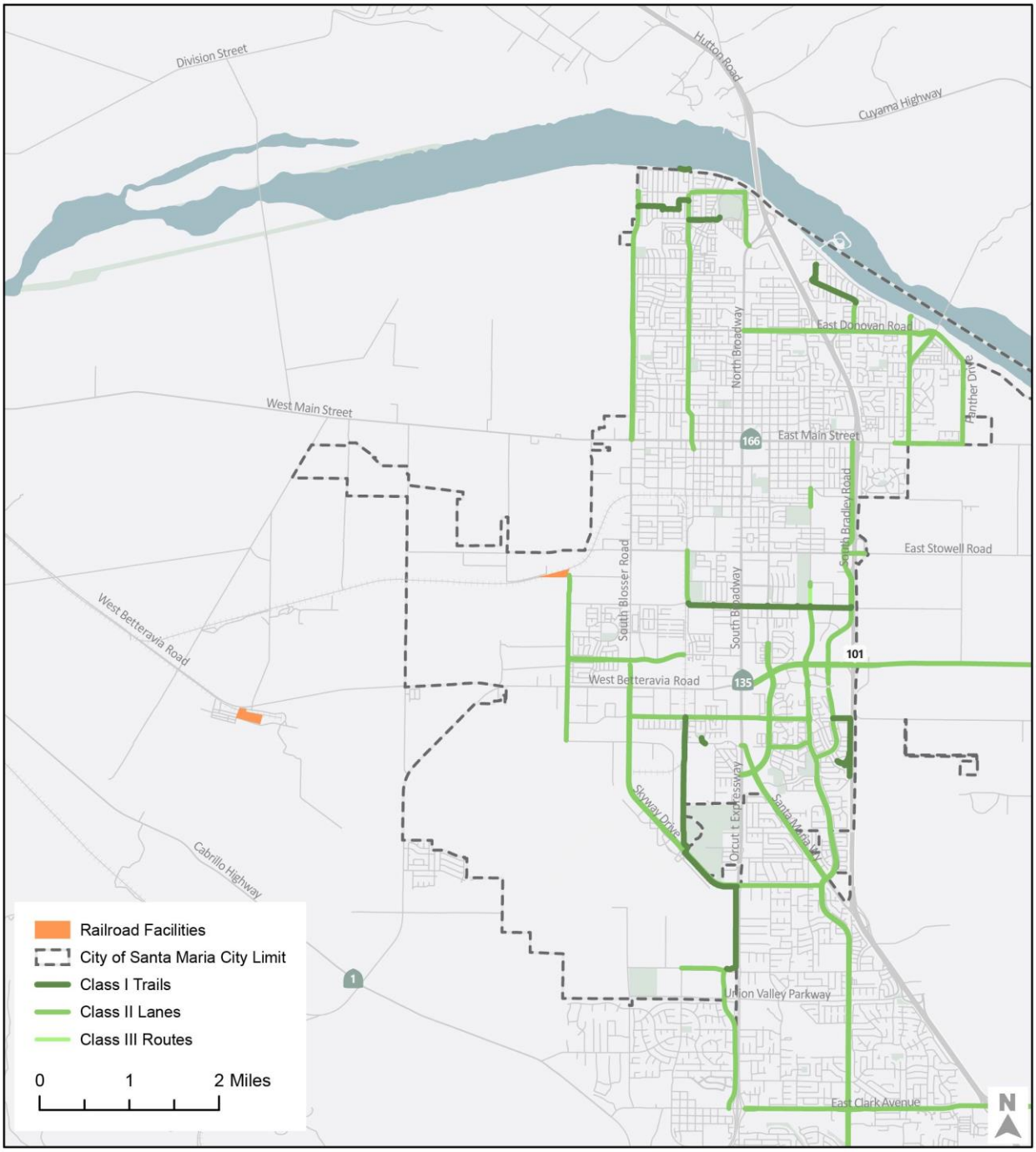
County of Santa Barbara

Street classifications are defined in the Circulation Element of the County of Santa Barbara Comprehensive Plan as follows (Santa Barbara, 2014):

- **Freeway:** A four or six lane divided arterial highway with full control of access and with grade separations at intersections. As the highest type of road facility, Freeways provide maximum service and safety for through traffic. Freeways serve as the principal arterials of the inter- and intra-state system of highways, carrying traffic between cities, traffic generators and points of interest.
- **Expressway:** A four lane arterial highway with at least partial control of which may or may not be divided or have grade separations at intersections. As a secondary type of intercity or community highway, Expressways carry much of the traffic between important centers of activity and employment.
- **Two Lane Expressway:** A two lane arterial highway with at least partial control of access which may have grade separations at intersections. As a secondary type of intercity or community highway, Expressways carry much of the traffic between important centers of activity and employment.
- **Arterial Road:** A divided four lane road with intersections at grade, and partial control of access. Arterial roads serve as the highest type of facility carrying local traffic within communities. With emphasis on through traffic carrying capability, these roads serve as principal access routes to shopping areas, places of employment, community centers, recreational areas, and other places of assembly.

  Major Road: An undivided four lane road with intersections at grade and partial control of access. Major roads serve as a secondary type of arterial facility carrying local through traffic within communities. Major Roads frequently serve as access to shopping areas, employment centers, recreational areas, residential areas, and places of assembly.

Figure 4.16-4. Santa Maria Bicycle Facilities



Source: Santa Barbara, 2014.

- **Two Lane Major Road:** An undivided, two-lane road with intersections at grade and partial control of access. Two Lane Major Roads serve as a secondary type of arterial facility carrying local though traffic within communities. Two Lane Major Roads frequently serve as access to shopping areas, employment centers, recreational areas, residential areas, and places of assembly. Where such roads serve industrially zoned property, the County Standard Industrial Street Section using 10-foot parking shoulders shall be used.

- **Collector Road:** A two lane undivided road with intersections at grade and designed to take a minimum interference of traffic from driveways. Collector Roads are designed to provide principal access to residential areas or to connect streets of higher classifications to permit adequate traffic circulation.

Roadways within the County of Santa Barbara to access the SMVR-SB site include:

- Betteravia Road – Betteravia Road is a Collector Road than runs through both the City of Santa Maria and unincorporated Santa Barbara County in an east-west direction. The road generally provides two travel lanes, with one lane in either direction. Betteravia Road runs from Simas Road in the west to Foxen Canyon Road and Philbric Road in the east. Betteravia Road provides access to US-101. Betteravia Road provides direct access to the SMVR-SB site at Simon Road.

The County of Santa Barbara does not have designated truck routes. However, the Santa Barbara County Code of Ordinances prohibits the use of trucks on the following roadways (Santa Barbara, 2017):

- Ballard Canyon Road – Motor trucks, over thirty feet in combined length, with three or more axles are prohibited
- Harris Grade Road – Autos with trailers over thirty feet in combined length, and trucks over thirty feet in combined length are prohibited.
- Painted Cave Road – Autos with trailers over thirty feet in combined length, and trucks over thirty feet in combined length are prohibited.
- San Marcos Road – Autos with trailers over thirty feet in combined length, and trucks over thirty feet in combined length are prohibited.

City of Pismo Beach

Street classifications are defined in the Circulation Element of the City of Pismo Beach General Plan as follows (Pismo Beach, 2019):

- **Freeways:** Provide high-speed intra- and inter-regional mobility. Access is typically restricted to arterials via interchanges, with grade-separated crossings and wide, continuous medians separate lanes traveling in opposite directions. Typically, the maximum speed limit on freeways ranges from 50 to 65 miles per hour (mph) with usually one mile or greater spacing between interchanges. US-101 is the only freeway in the city with multiple full or partial interchanges; ramps are closely spaced near Downtown and the Pismo Outlets.

- **Arterials:** Serve to connect areas of major activity within the urban or suburban area and function to distribute traffic between freeways or expressways and collector streets. Arterials have limited access directly to adjacent land uses. Typical arterials within the city are two to four lanes with speed limits ranging from 30 to 50 mph.

- **Collectors:** Function as connector routes between local and arterial streets, and provide access to residential, commercial, industrial (etc.) areas. Collector streets also provide direct access to adjacent properties; driveway access is not restricted but access should be managed so that driveway spacing does not inhibit the flow of traffic. Collectors within the City are typically two lanes with speed limits ranging from 30 to 45 mph.

- **Local Streets:** Provide direct access to adjacent properties and allow for localized movement of traffic. Local streets are characterized by low daily traffic volumes and speed limits of 25 to 30 mph. Although bike lanes are generally not required on local streets, it is assumed that local streets are bike-friendly and may be informally considered a Class III Bike Route.

Roadways within the City of Pismo Beach to access the PBR site include:

- Price Canyon Road – Price Canyon Road is an arterial road that runs through the City of Pismo Beach in a north-south direction. The road generally provides two travel lanes, with one lane in either direction. Price Canyon Road runs from Bello Street, where it turns into Hinds Avenue in the south to Carpenter Canyon Road (California State Route 227). Price Canyon Road provides an interchange with US-101 (southbound off-ramp only) via Hinds Avenue. Price Canyon Road provides direct access to the PBR site.
- Hinds Avenue – Hinds Avenue is a collector road in the City of Pismo Beach that runs in an east-west direction. The road generally provides two travel lanes and operates as an eastbound one-way street from the Pismo Beach Pier to Price Street. Hinds Avenue is a two-way street from Price Street until it becomes Price Canyon Road. Hinds Avenue provides an interchange with US-101 (southbound off-ramp only).
- Price Street – Price Street is an arterial road in the City of Pismo Beach that runs in a north-south direction. The road generally provides two travel lanes. Price Street includes central lane for left turns or center diagonal parking in select segments. Price Street runs from US-101 and Ocean View Avenue in the south to Cliff Avenue in the north when the street turns into Shell Beach Road. Price Street provides an interchange with US-101 (southbound on-ramp and northbound off-ramp) at Ocean View Avenue, an interchange with US-101 (southbound off-ramp only) at Cabrillo Highway, an interchange with US-101 (southbound off-ramp only) near Mattie Road, and an interchange with US-101 (southbound on-ramp only) near Cliff Avenue.
- Bello Street – Bello Street is a collector road in the City of Pismo Beach that runs in an east-west direction. The road generally provides two travel lanes, with one lane in either direction. Bello Street runs from a US-101 northbound ramp and Bay Street in the east to the PBR site in the west. Bello Street provides an interchange with US-101 (northbound on-ramp only) at Bay Street. Bello Street provides direct access to the PBR site.
- Intersecting streets between US-101 and the PBR site include:
  - Bay Street
  - Harloe Avenue
  - San Luis Avenue
  - Wadsworth Avenue
  - Pismo Avenue
  - Main Street
  - Stimson Avenue/Bettiga Way
  - Solar Way
  - Ocean View Avenue

Truck routes within the City of Pismo Beach include:

- Dolliver Street;
- Price Street;
- Hinds Avenue, between Bello and Dolliver Streets;
- Price Canyon Road, from the city limit to Bello Street;

- Bello Street, from the Edna Road to Hinds Avenue; and
- Ocean View Avenue, between Price Street and Dolliver Street.

Transit services in the City of Pismo Beach are provided by SLO RTA and SoCo Transit. Several SLO RTA and SoCo Transit bus routes operate on roads that will be used for the Proposed Project (see Figure 4.16-5) (Amtrak, 2022) (SLO RTA, 2022a).

- **RTA Route 10.** Route 10 operates along US-101 for most of its route and provides transit service between San Luis Obispo and the Santa Maria Transit Center. Route 10 is primarily a north-south route that provides access to Pismo Beach Premium Outlets.
- **South County Transit (SoCo Transit) Routes 21 and 24.** Routes 21 and 24 operate along Price Street for part of their route. Routes 21 and 24 are circular routes that provide access to various destinations, including the Pismo Beach Premium Outlets. Route 24 operates counterclockwise, and route 21 operates in a clockwise direction. Routes 21 and 24 operate along the same streets for most of their route.
- **Amtrak.** Amtrak's thruway bus service, Route 17, operates on US-101 from Santa Barbara to the Bay Area with an intermediate stop at Grover Beach. The bus uses South Dolliver Street to access US-101 in the City of Pismo Beach. Additionally, the Pacific Surfliner and Coast Starlight rail services operates on Union Pacific tracks that run adjacent to and serve the Pismo Beach Railyard.

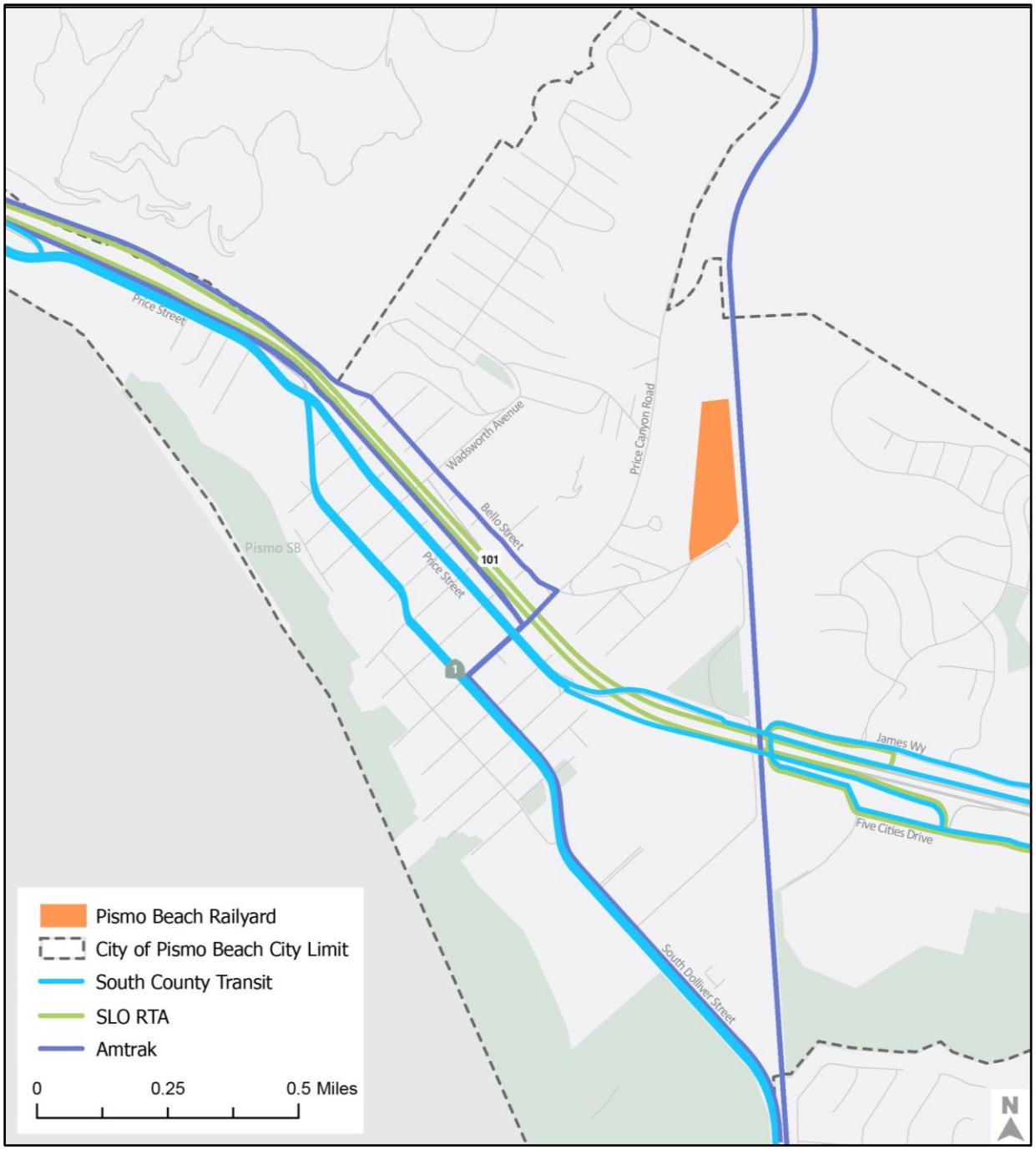
Existing bicycle facilities between US-101 and the PBR site (see Figure 4.16-6) include:

- Class II Bike Lanes on Price Street – From Cabrillo Highway to Cliff Ave, where Price Street turns into Shell Beach Road. The Class II lanes continue on Shell Beach Road until Avila Beach Drive
- Class III Bike Route on Price Street – From Cabrillo Highway to Ocean View Avenue
- Class III Bike Route on Hinds Avenue – From Pismo Beach Pier to US-101, where Hinds Avenue turns into Price Canyon Road
- Class III Bike Route on Price Canyon Road – From Hinds Avenue to Bello Street

Existing pedestrian facilities between US-101 and the PBR site include:

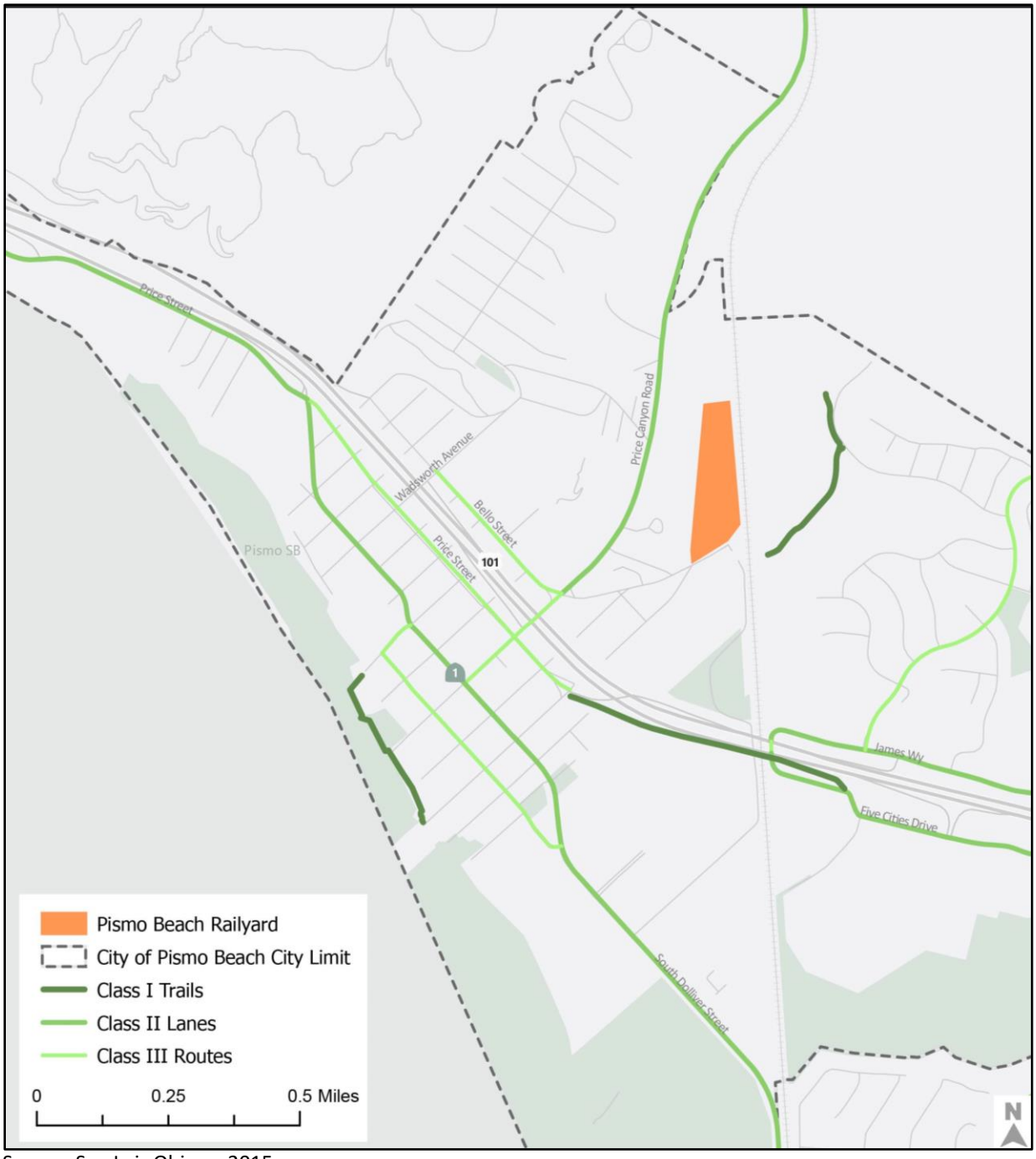
- Hinds Avenue and Price Canyon Road have continuous sidewalks, on both sides of the street, between US-101 and Bello Street. Price Canyon Road does not include a sidewalk between Bello Street and the PBR site. Bello Street has continuous sidewalks from Bay Street and the US-101 northbound on ramp and Price Canyon Road

Figure 4.16-5. Pismo Beach Transit Services



Source: Amtrak, 2022; San Luis Obispo, 2015.

Figure 4.16-6. Pismo Beach Bicycle Facilities



Source: San Luis Obispo, 2015.

4.16.1.2 Marine Transportation

Marine Vessel Study Area

The marine vessel study area is based on the proposed barge route to export waste during decommissioning activities for the Project (see Figure 4.16-7); the proposed barge routes from the Port of Long Beach and Santa Catalina Island to import materials (see Figure 4.16-8); and the proposed barge route between DCPP and Port San Luis Harbor for staging of barges (see Figure 4.16-9).

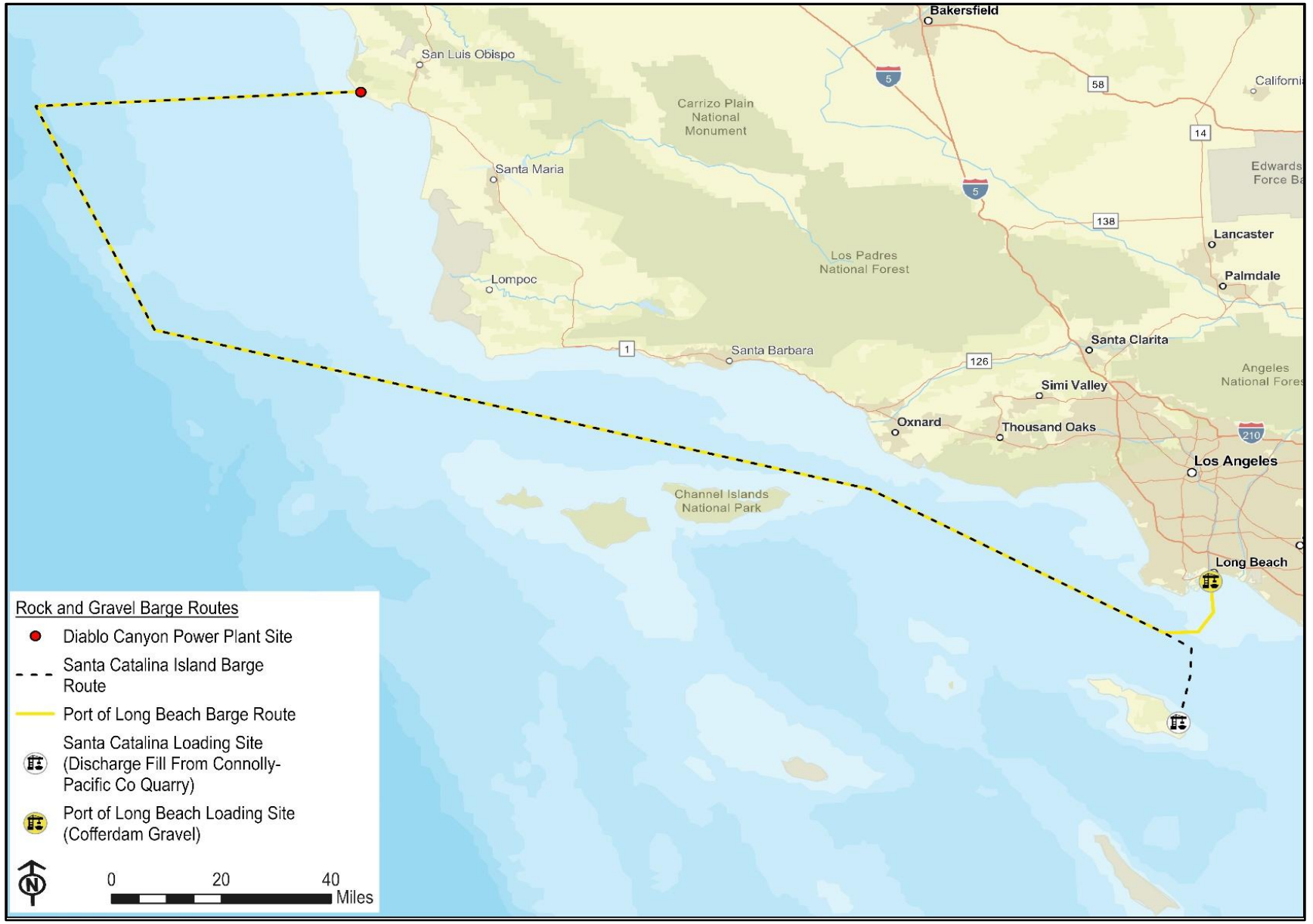
During decommissioning, various waste types would be exported by barge from the DCPP Intake Cove to the Port of Portland and the Port of Morrow in Portland and Boardman, Oregon, respectively (PG&E, 2021c). Barge trips would also be required to transport gravel from the Port of Long Beach to fill the Discharge Structure cofferdam, as well as from Santa Catalina Island to transport rock and boulders to fill the Discharge Structure void left in the bluff. Lastly, barges used for the Proposed Project would be temporarily staged at Port San Luis Harbor (PG&E, 2021b). Therefore, barges would need to be transported to and from this location.

Figure 4.16-7. Barge Route for Waste Export from the DCPP Site to Portland and Boardman, Oregon

Source: Esri, 2023; PG&E, 2021b; and PG&E, 2021d; and PG&E, 2022e – Figures 3.1-1 and 3.1-2.

The marine vessel study area extends approximately 50 nautical miles offshore in international waters from the coastline of California and Oregon (one nautical mile is equivalent to approximately 1.15 miles) and includes the barge routes from the DCPP Intake Cove to the Port of Portland in Portland, Oregon (approximately 1,020 miles) or to the Port of Morrow (approximately 1,180 miles) in Boardman, Oregon. In addition, the study area includes the barge routes from the Port of Long Beach to the DCPP Intake Cove (approximately 321 miles) and Santa Catalina Island to the DCPP Intake Cove (approximately 325 miles), both of which would occur 50 nautical miles offshore. Lastly, the study area includes an approximately 6-mile-long barge route between the DCPP Intake Cove and the Port San Luis Harbor.

Figure 4.16-8. Barge Routes to Import Cofferdam Gravel and Discharge Structure Area Fill



Source: Esri, 2023; and PG&E, 2022d – Figures 3.2-1 and 3.3-1.

Maritime Limits and Boundaries

Within the marine vessel study area, state waters extend out to 3 nautical miles off the state's coastline. Federal waters extend from the state water boundary to 200 nautical miles from the coastline. Federal waters are further divided into three areas: (1) the territorial sea, which extends to 12 nautical miles; (2) the contiguous zone, which is from 12 to 24 nautical miles; and (3) the exclusive economic zone, which is from 12 to 200 nautical miles, overlapping with the contiguous zone. International waters begin at 24 nautical miles from the coastline.

Marine Vessel Safety

The US Coast Guard, which operates under the US Department of Homeland Security during peacetime, is responsible for maritime safety, security, and stewardship. The marine vessel study area is within two US Coast Guard Districts:

- US Coast Guard District 11: District 11 encompasses the states of California, Arizona, Nevada, and Utah and their coastal and offshore waters, and the offshore waters of Mexico and Central America down to South America.
- US Coast Guard District 13: District 13 encompasses the states of Oregon, Washington, Idaho, and Montana and their coastal and offshore waters.

Each US Coast Guard District publishes a weekly Notice to Mariners, which is the primary means of disseminating information pertaining to navigational safety and other items of interest to mariners (PG&E, 2021b). Information contained in the Notice to Mariners includes reports of hazards to navigation, channel conditions, obstructions, dangers, anchorages, restricted areas, regattas, construction or modification of bridges, construction or removal of oil platforms, and laying of undersea cable. Notices are developed from information received from US Coast Guard field units, the general public, the US Army Corps of Engineers, US Merchant Fleet, National Ocean Service, and other sources, concerning the establishment of, changes to, and deficiencies in aids to navigation and any other information pertaining to the safety of the waterways.

The US Coast Guard uses a wide range of techniques and regulations to prevent vessel collisions, and groundings in the approach, harbor, and inland waterway phases of navigation. There are several specific types of navigational regulation systems that govern the shipment of goods in offshore areas. In areas where international ships converge at headlands, straits, and major harbors, the US Coast Guard and the International Marine Organization Traffic Separation Schemes (TSSs) to separate vessels and control crossing and meeting situations.

Marine vessels are also required to comply with Federal Inland Navigation Rules and the California Harbors and Navigation Code.

Marine Vessel Traffic Near the DCPP Site

The DCPP site is located along the central California coast, approximately 7 miles northwest of Avila Beach, 12 miles west-southwest of the City of San Luis Obispo, and directly southeast of Montaña de Oro State Park. The DCPP Intake Cove is approximately 10 acres in size and has been used for a variety of purposes over the years, including the transport via barge/tugboat to the DCPP of new steam generators as part of the Steam Generator Replacement Project in the mid-

2000s, as well as for delivery of oversized equipment including electrical transformers. In addition, the DCPP Intake Cove was previously utilized as a safe harbor for personal and commercial marine vessels in distress (PG&E, 2021b). However, as shown in Figure 4.16-9, a 2,000-yard (one nautical mile) security exclusion zone is currently maintained around the DCPP site, which limits how close private boats can get to the DCPP (PG&E, 2022b).

As described in the Project Description, this security exclusion zone was established by the US Coast Guard and US Department of Transportation and became effective in January 2003 to increase safety and security measures on the water fronts of nuclear power plants following the September 11, 2001, terrorist attacks against the United States. Entrance into the zone is prohibited unless specifically authorized by the US Coast Guard Captain of the Port for Sector Los Angeles-Long Beach (USCG and USDOT, 2002).

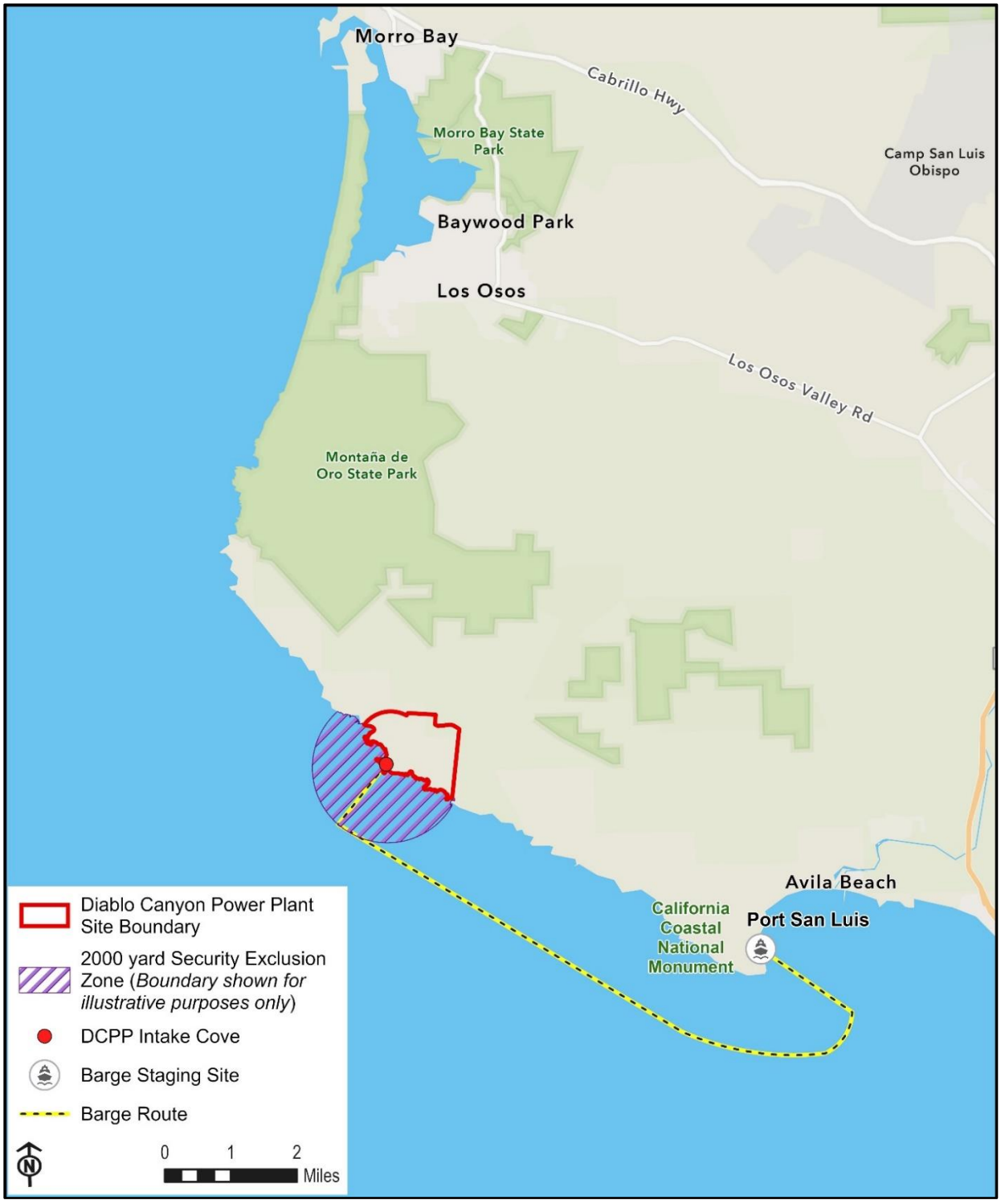
As shown in Figure 4.16-9, Port San Luis Harbor is in Avila Beach, approximately 7 miles southeast of the DCPP site in an unincorporated area of San Luis Obispo County. The harbor includes 278 moorings, with approximately 180 moorings occupied as of August 2020. Depending on where the mooring is located in the harbor, the water depth is approximately 20 to 40 feet. Every 15 years, the breakwater in Port San Luis Harbor requires repairs, which includes use of a barge. These repairs are facilitated by the US Army Corps of Engineers and usually last about 6 months. Repairs on the breakwater are expected to take place in approximately 2023, prior to commencement of the Proposed Project (PG&E, 2021b).

Within the Port San Luis Harbor District's jurisdiction are three piers: Avila Pier, which is used for fishing; Cal Poly Pier, which is owned by Cal Poly, San Luis Obispo and used as a marine research and education facility; and Port San Luis Pier (Harford Pier), which is open to the public and is the hub of commercial and recreational fishing activity in the Harbor District (PG&E, 2021b). Small boats, weighing less than 1,000 pounds including gear and engine, may be self-launched from the base of the pier. Additionally, boats up to 28 feet and 15,000 pounds, or 60 feet long, 18 feet beam, and 60 gross tons can be launched from the Port San Luis Boatyard by trailer or mobile hoist, respectively.

During Project implementation, barges used for the Proposed Project would be temporarily staged at Port San Luis Harbor (PG&E, 2021b). As described in Section 2.3.19.1, *Waste Transportation*, to support the Proposed Project, two empty barges would be stored at an offshore mooring in Avila Bay/Port San Luis for approximately one to two weeks at a time, and then transported to the DCPP Intake Cove when sufficient waste containers are filled and ready for loading. The proposed barge route between Port San Luis Harbor and the DCPP Intake Cove is shown in Figure 4.16-9.

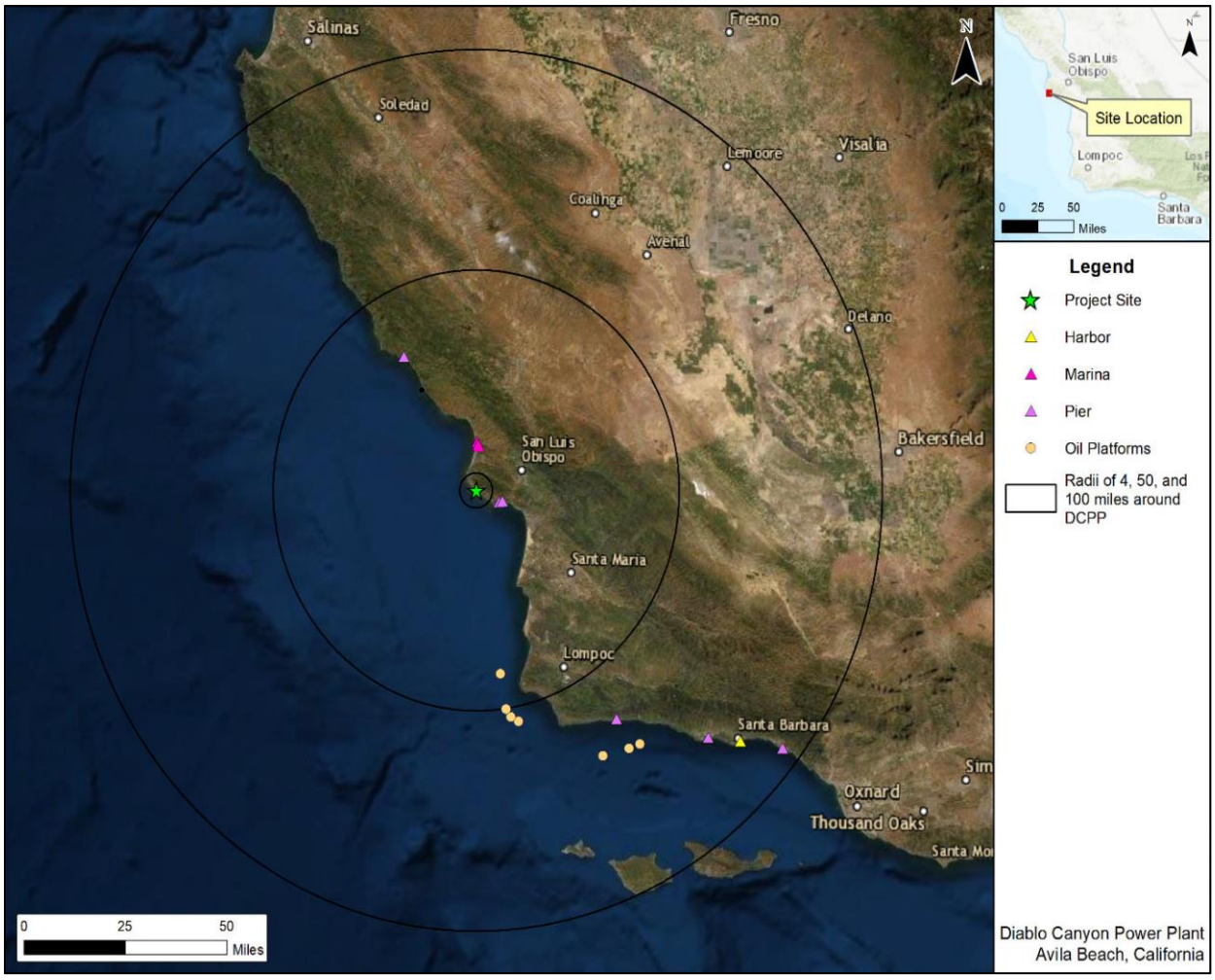
Offshore marine traffic around the DCPP site includes commercial and sport fishing, recreational boating out of Port San Luis Harbor to the southeast and Morro Bay Harbor to the north of the DCPP, and vessel traffic (e.g., container ships, oil tankers, auto carriers, and other miscellaneous bulk carriers) between San Francisco Bay and the Port of Long Beach or Port of Los Angeles (PG&E, 2021b). Figure 4.16-10 shows the location of the DCPP site, as well as ports, harbors, marinas, piers, and oil platforms within 4, 50, and 100 miles of the DCPP site.

Figure 4.16-9. DCPP Site Security Exclusion Zone and Route Between DCPP and Port San Luis



Source: PG&E, 2021b and 2022b.

Figure 4.16-10. DCPP Site and Surrounding Marine Transportation Facilities and Oil Platforms



Source: PG&E, 2022d – Figure 1-1.

More than 4,000 large vessels travel along the central California coast every year, most within 15 nautical miles of the shoreline of San Luis Obispo County (PG&E, 2011). The majority of these vessels are fishing and recreational vessels that operate out of Morro Bay Harbor and to a lesser extent, Port San Luis Harbor. Because the DCPP is situated between San Luis Bay and Morro Bay, two popular destinations for marine recreation, pleasure crafts are commonly observed near the DCPP vicinity (PG&E, 2021b).

Marine Vessel Traffic Off the California Coast

Designated coastwise shipping traffic lanes have been established by the US Coast Guard and the International Marine Organization along two portions of the California coast: (1) in the vicinity of the entrance to San Francisco Bay, and (2) from Point Conception (Santa Barbara County) south-east to the vicinity of the entrance to the Ports of Los Angeles and Long Beach (PG&E, 2012). The shipping lanes are generally 4 to 20 nautical miles offshore and are separated by an approximately one nautical mile separation zone. Vessel traffic within these lanes may include tanker ships, container ships, military vessels, research vessels, cruise ships, tugs and tows, commercial fishing boats, and recreational vessels.

Where shipping lanes have not been established, such as the central coast of California, navigation practice has produced a pattern of traffic flow at various distances from shore based on transit direction, vessel type, and cargo. Members of the Western States Petroleum Association, whose tankers carry crude oil from Alaska, agreed in 1990 to voluntarily keep laden vessels a minimum of 50 nautical miles from shore along the California central coast. Slower ocean tank barges transit the central coast approximately 15 to 25 nautical miles from shore to minimize interaction with the offshore oil tankers and the inshore container ships (PG&E, 2012).

In 2000, an agreement was made between US shipping officials; the International Maritime Organization; and the Monterey Bay, Gulf of the Farallones, and Channel Islands National Marine Sanctuaries which specified distances from the shoreline that various commercial vessel types were to remain while in transit offshore the central California coast. While large vessels were to remain 15 to 23 nautical miles offshore, ships carrying hazardous materials were to remain 29 to 34.5 nautical miles offshore, and tankers were required to stay at least 57.5 nautical miles offshore.

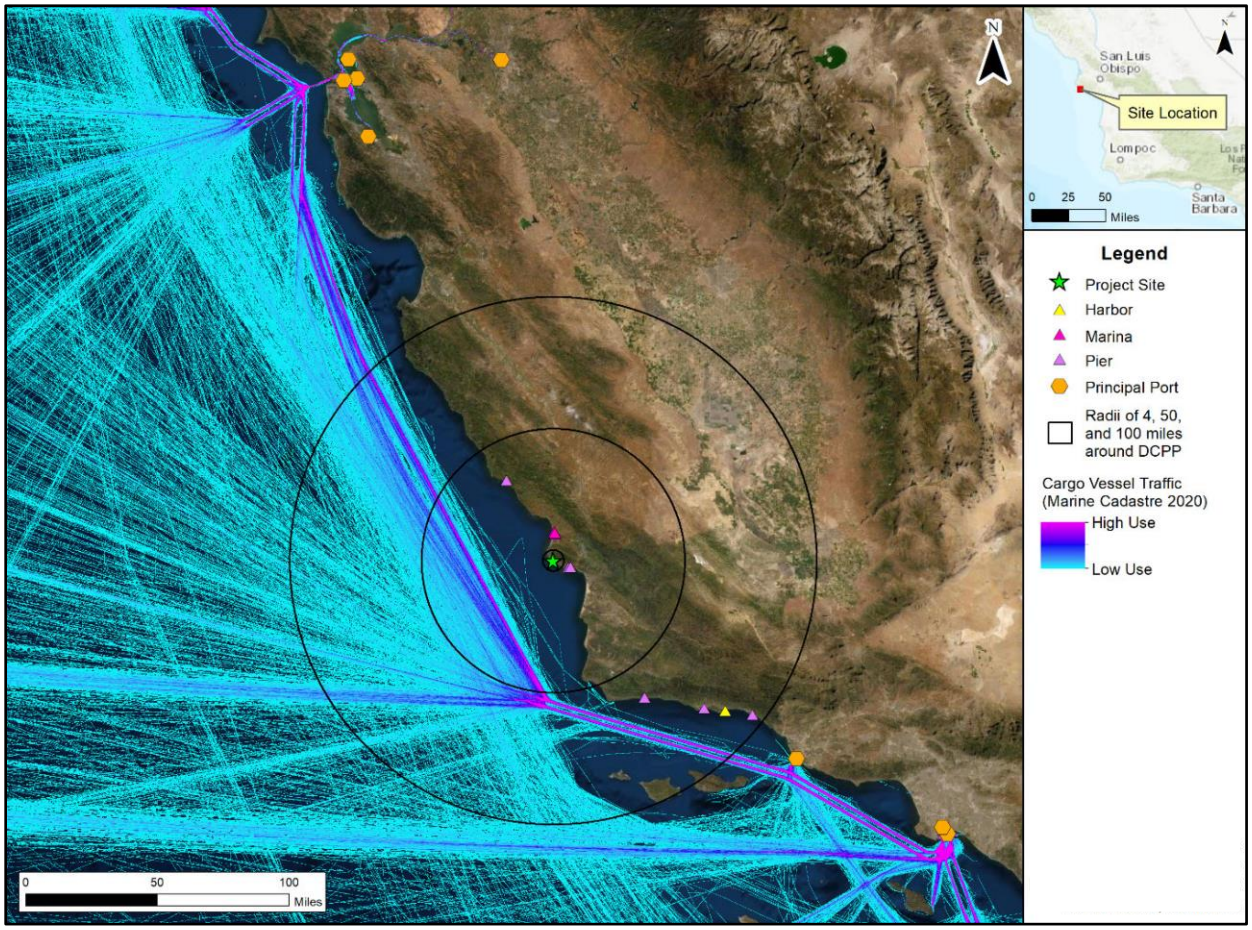
The Monterey Bay National Marine Sanctuary is located along the central California coast between Cambria (approximately 28 miles northwest of the DCPP site) and the Marin Headlands (just north of San Francisco) and extends up to 50 nautical miles offshore (NOAA, 2019). Recommended tracks for vessels carrying hazardous cargo in bulk are 25 nautical miles offshore going northbound and 30 nautical miles offshore going southbound between Pigeon Point and Point Sur within the Marine Sanctuary boundaries (NOAA, 2015).

The barge route for waste export during decommissioning activities for the Proposed Project would be approximately 50 nautical miles offshore in international waters (PG&E, 2021b); therefore, barges associated with waste export would not travel within designated shipping lanes but would be within the same area as offshore oil tankers (a minimum of 50 nautical miles from shore).

Baseline data for oil platforms and marine traffic from cargo vessels, fishing vessels, and pleasure crafts were identified between the Port of Oakland and the Port of Los Angeles using the most recent data from the Marine Cadastre, an initiative by the Bureau of Ocean Energy Management and the National Oceanic and Atmospheric Administration (NOAA) to consolidate marine data. Traffic between these two ports was considered since the Port of Long Beach, followed by Port of Los Angeles, is the most active port on the West Coast of the United States. Harbormasters within 100 miles of the Project site were also contacted to obtain information regarding vessel traffic.

Cargo traffic between the Port of Oakland and the Port of Los Angeles is shown in Figure 4.16-11. Cargo traffic typically occurs beyond 10 nautical miles outward from the coast and is mostly consolidated into six shipping lanes, which are highlighted in dark blue and purple.

Figure 4.16-11. Cargo Vessel Traffic Between the Port of Oakland and Port of Los Angeles



Source: PG&E, 2022d – Figure 2.2.1-1.

Recreational fishing vessels, pleasure crafts, and sailing activity mostly occurs within 50 nautical miles of the coast, with some crafts traversing within 4 nautical miles of the DCPP. Figure 4.16-12 shows traffic caused by fishing activity between the Port of Oakland and the Port of Los Angeles. Figure 4.16-13 shows traffic caused by pleasure crafts between these two ports.

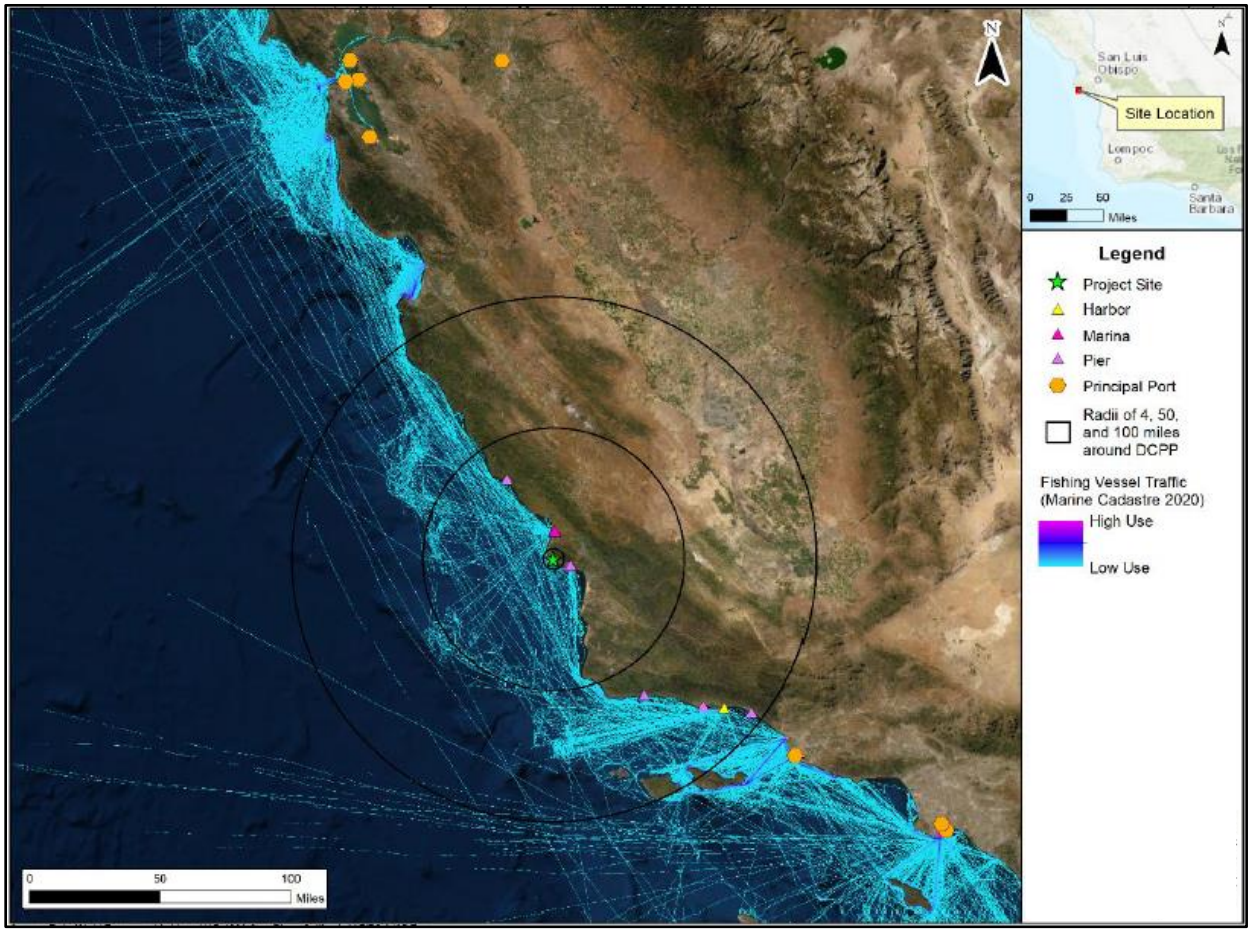
Marine Vessel Traffic on the Columbia River

As shown in Figure 4.16-14, the barge route for waste export under the Proposed Project would extend from the Pacific Ocean east along the Columbia River to the Port of Portland and the Port of Morrow in Portland and Boardman, Oregon, respectively. The Columbia River includes a 600-foot-wide, 43-foot-deep navigation channel that generally follows the Oregon-Washington border and extends 106.5 miles from the mouth of the Columbia River at the Pacific Ocean to Vancouver, Washington. The Columbia River Channel Improvements Project was completed in November 2010, which deepened the Columbia River navigation channel to accommodate the current fleet of international bulk cargo and container ships and improved the condition of the Columbia River estuary through the completion of environmental mitigation and restoration projects. The Columbia River is the nation's largest wheat export gateway and the third largest grain export corridor in the world (USACE, 2022).

The Columbia River is open to vessel traffic at all times of the year and has been a center for trade and transport in the Pacific Northwest since the 1930s. The river is typically able to accommodate larger-scale barges, although boat specifications may vary for ocean barges. This is due to the influence of barge size on the distance between the barge's underside and river bottom. The Columbia River is also known as an ideal location for recreational fishing, and anglers have full access to the river year-round (PG&E, 2022d).

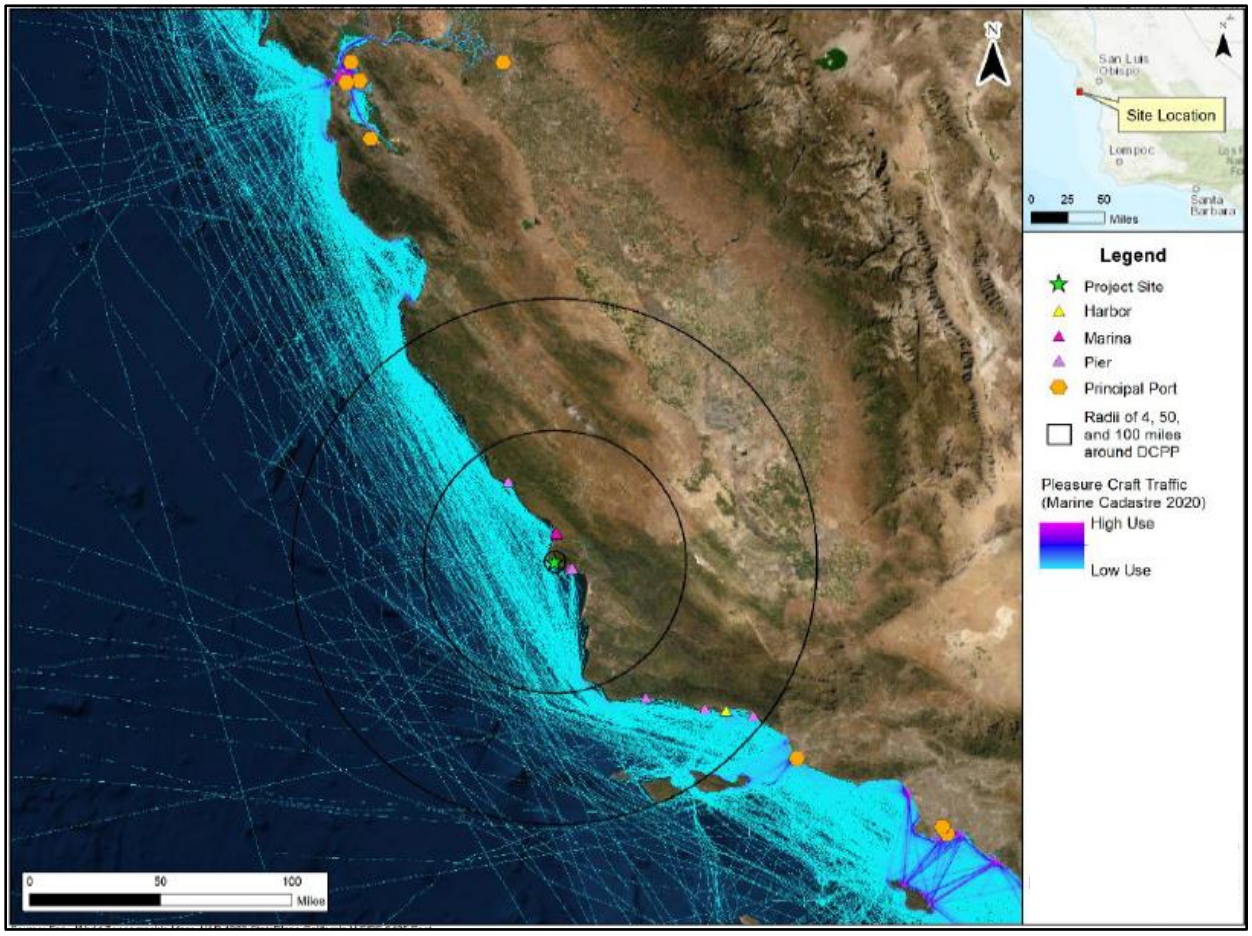
As shown in Figure 4.16-14, the Port of Portland is located approximately 65 miles southeast of the Oregon coast. This port is Oregon's largest port and ships over 11 million tons of cargo each year (Port of Portland, 2022b). The port's marine terminals are located along the Willamette River and the Columbia River. Terminal 6 , which is the only terminal located along the Columbia River and is anticipated to be used for the Proposed Project, is a 420-acre, multi-use terminal that handles containers, project cargo (large, heavy-duty, high value, or complex pieces of equipment), and breakbulk (cargo that cannot fit into a container and is not carried in bulk) and also features a direct rail service (Port of Portland, 2022a). Under the Proposed Project, recyclable material would be transported from this port by rail to a recycling facility in Salt Lake City, Utah.

Figure 4.16-12. Fishing Vessel Traffic Between the Port of Oakland and Port of Los Angeles



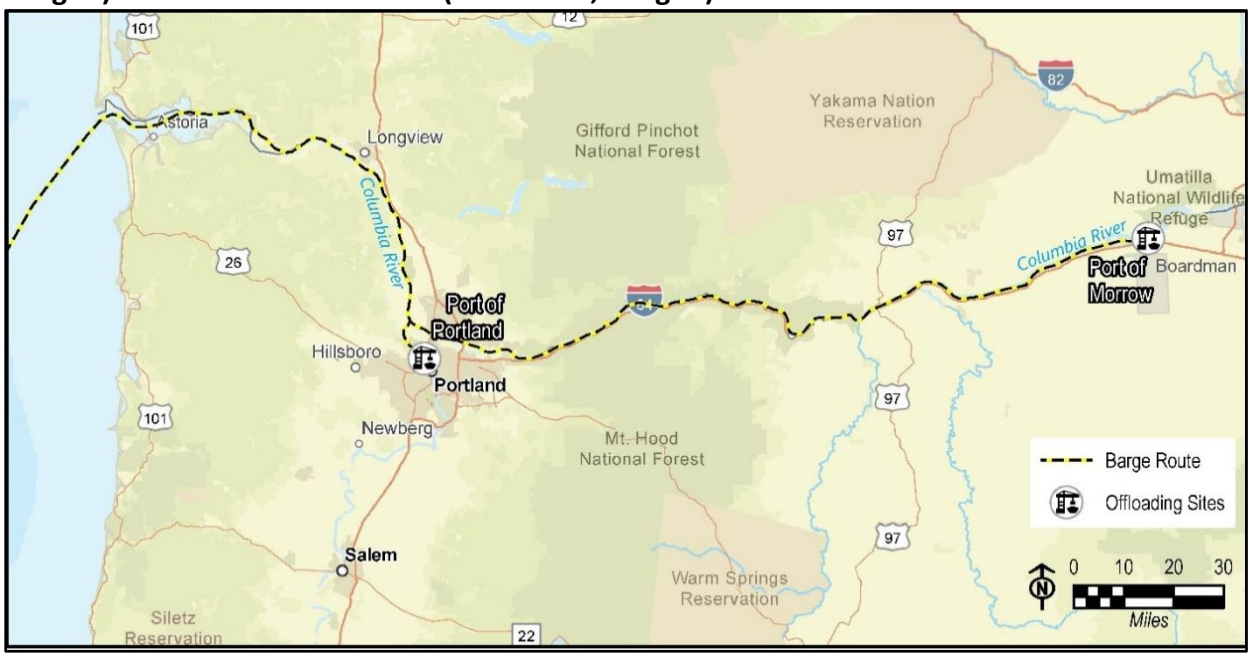
Source: PG&E, 2022d – Figure 2.2.2-1.

Figure 4.16-13. Pleasure Craft Traffic Between the Port of Oakland and Port of Los Angeles



Source: PG&E, 2022d – Figure 2.2.3-1.

Figure 4.16-14. Barge Route Along the Columbia River to the Port of Portland (Portland, Oregon) and the Port of Morrow (Boardman, Oregon)



Source: PG&E, 2021d.

As shown in Figure 4.16-14, the Port of Morrow is located along the Columbia River in Boardman, Oregon, approximately 160 miles east of the Port of Portland. Under the Proposed Project, hazardous waste, Low Activity Radioactive Waste (LARW), and Licensed Class A Waste would be transported from the Port of Morrow by rail to disposal facilities in Idaho or Utah (PG&E, 2021a). From the Port of Morrow, clean material (i.e., non-radiological waste) would be transported by truck to landfills in the Columbia Gorge area (PG&E, 2021a and 2022a). There are five landfills in the Columbia Gorge area; waste could be transported to one or multiple landfills in the area. As discussed in Section 4.14, *Public Services and Utilities*, these landfills have sufficient capacity to accommodate waste generated by the Proposed Project.

The Port of Morrow includes four industrial parks that are served by various transportation modes. The Union Pacific Railroad mainline passes through the Boardman Industrial Park and the East Beach Industrial Park (Port of Morrow, 2022). Currently, the railroad mainline does not extend to the port's marine terminals along the Columbia River. However, in 2018, the Port of Morrow was awarded a $19.4 million US Department of Transportation BUILD Grant for the Columbia River Barge Terminal Rail Access Project, which will extend rail spurs from the Union Pacific mainline to the port's marine terminals and enable rail-to-barge access for shipments along the Columbia River; construction of this project is anticipated to be completed in late 2023 (Port of Morrow, 2018).

4.16.2 Regulatory Setting

This section summarizes the state, regional, and local plans and policy documents pertinent to potential transportation impacts. Appendix C includes a summary of other federal and state laws, regulations, and policies that pertain to transportation.

Federal

Title 33 of the Code of Federal Regulations (CFR) Parts 1 through 399. Federal regulations concerning marine navigation are codified in 33 CFR Parts 1 through 399 and are implemented by the US Coast Guard and the US Army Corps of Engineers. Under 33 CFR Part 72 (Marine Information), the US Coast Guard issues Notices to Mariners, which are intended to advise mariners of new hydrographic discoveries, changes in channels and navigational aids, and information concerning the safety of navigation. Under 33 CFR Part 83.10 (Traffic Separation Schemes (TSS)), rules related to TSSs state that vessels must avoid crossing traffic lanes, or cross on a heading as nearly as practicable to right angles to the general direction of traffic flow; or if not using a TSS, avoid it by as wide a margin as is practicable. Under 33 CFR Part 160 (Ports and Waterways Safety-General), the US Coast Guard must be informed of any vessel movement, including the transport of hazardous waste. The National Vessel Movement Center was established by the US Coast Guard, in accordance with 33 CFR Part 160 as a single clearinghouse for submission and processing of notice of arrival and departure information for vessels entering US ports and facilities. A notice also provides updates to navigational charts for other vessel operators to reference to promote maritime safety and ensure that vessel traffic does not affect the navigational ability of other vessel operators.

46 CFR Parts 1 through 599. Federal regulations for marine vessel shipping are codified in 46 CFR Parts 1 through 599 and are implemented by the US Coast Guard, Maritime Administration, and

Federal Maritime Commission. Parts 145 through 155 cover dangerous cargo and certain bulk dangerous cargo, including stowage and segregation requirements and the compatibility of cargoes.

State

California Vehicle Code. Division 2, Chapter 2, Article 3 defines the powers and duties of the California Highway Patrol (CHP), which enforces vehicle operation and highway use in the State (State of California, 1959). The California Department of Transportation (Caltrans) is responsible for the design, construction, maintenance, and operation of the California State Highway System and the portion of the Interstate Highway System within State boundaries.

Division 15, Chapter 5, Article 6 defines the special permits and agreements required for authorization to operate vehicles exceeding legal size, weight or load specified elsewhere in the California Vehicle Code. Among the provisions of this Article include discretion of Caltrans to issue permits based on the vehicle and load weight if it would exceed the maximum load limit and to assess fees.

Caltrans, under its Traffic Operations division, has the discretionary authority to issue special permits for the use of California State highways for other than normal transportation purposes. Caltrans also reviews all requests from utility companies, developers, volunteers, nonprofit organizations, and others desiring to conduct various activities within the California Highway right of way. For special transportation moves including over-height/overweight (extralegal) loads, applicants must submit applications detailing the vehicle, load, weight, origin, destination, requested route, and other details. Caltrans has published a Transportation Permits Manual which defines all types of cargoes and vehicles including hazardous materials, radioactive waste, special construction equipment, and other categories that may apply to the DCPP Project. The manual includes specifications for the Applicant on considering all aspects of the trip including vehicle inspections, routing and safety requirements, compliance and penalties. See also Appendix G2 regarding the transport of radioactive materials.

The Caltrans Highway Design Manual, prepared by the Office of Geometric Design Standards (Caltrans, 2020a), establishes uniform policies and procedures to carry out the highway design functions of Caltrans. Caltrans has also prepared a Guide for the Preparation of Traffic Impact Studies (Caltrans, 2020b). Objectives for the preparation of this guide include providing consistency and uniformity in the identification of traffic impacts generated by local land use proposals.

Caltrans publishes guidance on statewide and local truck routes including current weight and length restrictions (Caltrans, 2020c).

Division 14.5 assigns oversight of transportation of radioactive materials to the CHP in consultation with the State Department of Health Services, including defining the time and routes acceptable for shipment. Further, part 33002 requires a transporter to notify CHP in advance of the intended shipment, and CHP is then responsible for coordination with other life safety officials.

California Code of Regulations, Chapter 13 Standards Applicable to Transporters of Hazardous Waste. Title 22, Division 4.5, Chapter 13 of the hazardous waste regulations applies to carriers transporting hazardous waste when that waste is subject to the manifesting requirements of

Chapter 12 (State of California, 1991). In general, transporters of hazardous waste must comply with these requirements and statutory requirements in Health and Safety Code, Division 20, Chapter 6.5, Article 6 & 6.5, as well as the specific Caltrans requirements referenced throughout the transporter regulations.

Transporters are required to comply with the regulations in the California Code of Regulations, Title 22, Division 4.5, Chapter 12 (Standards Applicable to Generators of Hazardous Waste) if they import hazardous waste into the United States (State of California, 1991). They must also follow certain California Code of Regulations, Title 22, Division 4.5, Chapter 13 (Standards Applicable to Transporters of Hazardous Waste) requirements if they mix hazardous wastes of different Caltrans shipping descriptions in a single container (66263.10(c)). In such instances, the transporter does not actually become the generator, but generator responsibilities must be assumed.

Senate Bill 743 Vehicle Miles Traveled Analysis (Public Resources Code Section 21099). SB 743 directed the Office of Planning and Research (OPR) to develop revisions to the California Environmental Quality Act (CEQA) Guidelines to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service (LOS) (OPR, 2018). On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. These changes include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for land use projects and plans in California. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "…more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

In response to SB 743, the California Natural Resources Agency adopted revisions recommended by OPR to the CEQA Guidelines on December 28, 2018. CEQA Guidelines Section 15064.3 and Appendix G: Environmental Checklist Form, Section XVII, Transportation. Section 15064.3 includes new criteria for determining the significance of a project's transportation impacts. Specifically, Section 15064.3(a) states "vehicle miles traveled is the most appropriate measure of transportation impacts." With this change, lead agencies can no longer use automobile delay, as measured by LOS or similar measures of vehicular capacity or traffic congestion, to assess transportation impacts under CEQA. The following key text concerning the analysis of transportation impacts is taken directly from the 2022 CEQA Guidelines:

> *(b) Criteria for Analyzing Transportation Impacts.*
>
> > *(1) Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.*

These new regulations became fully effective as of July 1, 2020. Agencies which have not yet voluntarily adopted their own criteria and policies for analyzing VMT may follow the OPR guidelines, *Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018*. See below in Section 4.16.3 (Significance Criteria) for a discussion on the applicability of the new CEQA guidelines resulting from SB 743 to the Proposed Project.

Regional

As described in Section 1.3.3.2, *Surface Transportation Board*, railroads are under the jurisdiction of the federal government such that local agencies are preempted from exercising jurisdiction.

Marine Transportation. Under the Proposed Project, PG&E proposes to conduct coordination with the harbormaster for Port San Luis to notify them of increases to vessel traffic as well as for staging barges at Port San Luis (PG&E, 2021b). PG&E would be required to comply with the Port San Luis Code of Ordinances (Port San Luis Harbor District, 2021), as applicable.

San Luis Obispo Council of Governments 2019 Regional Transportation Plan. San Luis Obispo County's 2019 Regional Transportation Plan addresses regional transportation needs and prioritizes projects to improve mobility and the efficiency of the transportation network and reduce GHGs. As noted above, SLOCOG is the Metropolitan Planning Organization (MPO) for San Luis Obispo County and the seven cities in the region including Arroyo Grande, Atascadero, Grover Beach, Morro Bay, Paso Robles, Pismo Beach, and San Luis Obispo. The RTP provides a vision for future growth and development in the San Luis Obispo area for the next 25 years and is the long-term blueprint for the region's transportation system. The RTP identifies and analyzes transportation needs for the metropolitan region and contains goals, policy objectives, action strategies, and investments to maintain, manage, and improve the transportation system in the San Luis Obispo region. The RTP includes several goals, objectives, and action strategies that could relate to the proposed project, including safe use of roadways the project may affect, maintenance of truck routes, and the transport of potentially hazardous and/or radioactive materials through the region.

Santa Barbara County Association of Governments Connected 2050. Connected 2050 is the long-range RTP and Sustainable Communities Strategy for the County of Santa Barbara region developed by the Santa Barbara County Association of Government (SBCAG, 2021). SBCAG is a regional planning agency comprised of Santa Barbara County and the eight incorporated cities in the county. The Connected 2050 Plan provides a vision for the region's future that balances transportation and housing needs with social, economic, and environmental goals. Connected 2050 provides recommendations for the SBCAG region to make decisions about transportation, land use, and housing. Goal Area 4 addresses roadway safety to ensure facilities provide safe accommodation for all users, and completion of emergency preparedness plans for potential natural or man-made disasters.

Local

County of San Luis Obispo, Framework for Planning (Inland). The County of San Luis Obispo's Framework for Planning (Inland) includes the Land Use and Circulation Elements of the County's General Plan (San Luis Obispo, 1980a). A portion of the DCPP site falls within the inland area designated by the Framework for Planning. The Land Use and Circulation Elements of the General

Plan describe the County policy regarding land uses, growth, and development as it relates to transportation. The Circulation Element establishes goals and policies to meet pedestrian circulation needs by providing usable and attractive sidewalks, pathways, and trails to establish maximum access and connectivity between land use designation. Goals and policies in the Circulation Element are implemented in conjunction with the Land Use Element Area and community/village plans. Policy M of the County of San Luis Obispo Framework for Planning (Inland) refers itself to the County RTP for direction on policies and programs regarding non-roadway modes rather than define policies specific to the Inland Area. All other policies from the Framework for Planning (Inland) address transportation network development elements that the Proposed Project would not directly affect. Policy M is quoted below:

> ***Policy M. OTHER TRANSPORTATION MODES.*** *In addition to streets, public transit, and airports, other transportation modes affecting land use planning include harbors and seaports, pipelines, transmission lines, rail, and transportation terminals. The area plans contain policies for the local development and use of those systems. The Regional Transportation Plan contains a specific discussion of issues, programs, and policies for those components of the county circulation system and it is incorporated by reference as though it were fully included here.*

County of San Luis Obispo Local Coastal Program Policy Document. The County of San Luis Obispo Local Coastal Program Policy Document is a portion of the San Luis Obispo County Land Use Element of the General Plan and includes policies and land use designations to comply with the California Coast Act of 1976 (San Luis Obispo, 2007). The Local Coastal Program Policy Document states that Avila Beach Drive is an important coastal access route that is heavily used by recreational users. The proposed land use improvements in the General Plan would not significantly affect traffic capacity along this roadway. Policy 5 in Chapter 5 (Commercial Fishing & Recreational Boating) states that proposed development at Port San Luis shall be within the circulation and utility capacity available to the harbor area; and that Avila Beach Drive shall not be subjected to traffic levels exceeding level of service "C," based on the average hourly weekday two-way 3:00 p.m. to 6:00 p.m. traffic counts to be conducted during the second week in May of each year. This policy is relevant to proposed improvements in the harbor, which is not part of the Proposed Project. Therefore, the Local Coastal Program Policy Document does not include any policies that are applicable to the Proposed Project.

County of San Luis Obispo Avila Community Plan. The Avila Community Plan establishes a vision for guiding land use and transportation over the next 20 years and is part of the County of San Luis Obispo Land Use and Circulation Element (San Luis Obispo, 1980b). The Community Plan establishes policies, programs, and standards to help achieve this vision. The Community Plan includes a Circulation Element that focuses on transportation and circulation in the Avila Urban Reserve Line, considering the different needs to automobiles, transit vehicles, pedestrians, and bicyclists. The Circulation Element of the Community Plan describes existing and proposed major transportation routes and public facilities. An updated Community Plan was drafted and released for public comment in 2021. Staff have been meeting with community members and with internal stakeholders to revise the Draft Avila Community Plan, incorporating some of the comments received. The Circulation Element of the Community Plan describes existing and proposed major transportation routes and public facilities and identifies evacuation routes in the event of a

hazardous occurrence. Community priorities for transportation and circulation include traffic control on Avila Beach Drive that ensures public safety, and permitting events only at non-peak traffic times. Draft Policy CIR-8 seeks to develop an emergency evacuation plan for the Avila Urban Reserve Line area with a specific item regarding provision of a public emergency access route through the decommissioned DCPP site to Montaña de Oro beginning with Phase 1B of the Project; this Policy is not formally adopted.

County of Santa Barbara Comprehensive Plan Circulation Element. The Circulation Element of the County of Santa Barbara Comprehensive Plan identifies the general location and extent of existing and proposed major roads, transit routes, terminals and public utilities and facilities in correlation with the Land Use Element, throughout the unincorporated areas of Santa Barbara County (Santa Barbara, 2014). The Circulation Element applies to all roadways and intersections within the unincorporated area of Santa Barbara County, except for roadways and intersections located within an area included in an adopted community or area plan. The Circulation Element also applies standards to projects within the unincorporated area that may create impacts to level of service thresholds within incorporated cities.

The purpose of the Circulation Element is to balance the future land use development and roadway capacity. The circulation element defines policy consistency for how projects contribute average daily trips (ADTs) to roadways based on their functional classification (number of lanes, intended use). The Circulation Element also defines intersection delay standards based on volume-to-capacity (V/C) ratios, a method which is no longer considerable under CEQA (see discussion above regarding SB 743). A Project would be inconsistent with the policy if it increased ADT or V/C on affected roads and intersections beyond the estimated future capacity.

City of Pismo Beach General Plan Circulation Element. The Circulation Element of the City of Pismo Beach General Plan provides goals, policies, and programs pertaining to the City of Pismo Beach, and identifies a comprehensive plan for transportation improvements (Pismo Beach, 2018). The goals, objectives, and policies outlined in the Circulation Element establish a citywide strategy to achieve long-term mobility and accessibility for all travel modes in Pismo Beach while also serving Pismo Beach's projected development. The Circulation Element closely correlates with the Land Use Element and is intended to enhance mode choice for all users in Pismo Beach. The Circulation Element also defines a preferred transportation system that reflects Pismo Beach's financial resources and goals to provide safe and convenient access for all travel modes while preserving the local community character.

The following policies within the Circulation Element of the City of Pismo Beach General Plan are relevant to the Proposed Project.

> **Guiding Policy 4.1 Promote safe and efficient goods movement.** Promote the safe and efficient movement of goods via truck and rail with minimum disruptions to residential areas.
>
> **Implementing Policy 4.3 Hazardous Materials.** The truck routes for hazardous materials shall be limited to US-101. The City shall request Caltrans to remove State Route 1 as a designated hazardous materials route.

City of Santa Maria General Plan Circulation Element. The Santa Maria Circulation Element evaluates the transportation needs of the city and creates a plan to accommodate these transportation needs (Santa Maria, 2011). The purpose of the Circulation Element is to guide the improvement of the circulation system in Santa Maria in correlation with the Land Use Element, preserve future road rights-of-way, and to provide for public mobility and support for the existing and anticipated population in Santa Maria. The Circulation Element serves the following needs: coordinate the transportation and circulation system with planned land uses; promote the efficient transport of goods and the safe and effective movement of people; make efficient use of existing transportation facilities; and protect environmental quality and promote wise and equitable use of economic and natural resources. The City of Santa Maria is currently in the process of updating the General Plan.

The following policies within the Santa Maria Circulation Element are relevant to the Proposed Project.

> **POLICY C.1.b Driveways and other Encroachments.** Develop access standards regarding new driveways and other encroachments to arterial and collector streets to minimize conflicts that are detrimental to safe and efficient operating conditions.
>
> **POLICY C.6.e.1 Rail Transportation (Preserve the SMVRR right-of-way).** To preserve railroad and utility rights-of-way to provide for the development of a fixed light rail transportation system to serve the community.
>
> The City of Santa Maria will continue to support the phased implementation of the light rail transportation network delineated in Figure C-3. The phased implementation may include existing freight service, an open space corridor, multi-purpose trail (bicycling/ jogging), fixed bus route, and a light rail system.

Policy Consistency

Table 4.16-1 includes a list of plans and programs relevant to transportation as well as a preliminary evaluation of the Proposed Project's consistency with each of these plans and programs.

Table 4.16-1. Consistency with Applicable Programs, Plans, Ordinances, and Policies

Plan/Policy	Consistent?	Discussion
California Vehicle Code. Chapter 2, Article 3 defines the powers and duties of the California Highway Patrol, which enforces vehicle operation and highway use in the State. Caltrans is responsible for the design, construction, maintenance, and operation of the California State Highway System and the portion of the Interstate Highway System within State boundaries. The California Vehicle Code requires any extralegal transport (oversize loads) to obtain a permit through Caltrans and notify CHP.	Consistent	Project transportation would comply with vehicle operation and highway use enforced by the California Highway Patrol and would be consistent with the California Vehicle Code.

Table 4.16-1. Consistency with Applicable Programs, Plans, Ordinances, and Policies

Plan/Policy	Consistent?	Discussion
California Code of Regulations, Ch. 13 Standards Applicable to Transporters of Hazardous Waste. Chapter 13 of the hazardous waste regulations applies to carriers transporting hazardous waste when that waste is subject to the manifesting requirements of Chapter 12. In general, transporters of hazardous waste must comply with these requirements and statutory requirements.	Consistent	The transportation of hazardous waste associated with the Project would occur by barge, truck, or rail, and would be consistent with hazardous waste regulations implemented under California Code of Regulations, Ch. 13.
SB 743. This bill took effect July 1, 2020; it changed the method of traffic analysis required under CEQA from level of service (LOS) to vehicle miles traveled (VMT).	Consistent	This EIR analyzes transportation impacts following the requirements of SB 743 and subsequent guidance. Therefore, the Project is consistent with SB 743.
Caltrans District 5 and the Counties of San Luis Obispo and Santa Barbara. The roadway network within the Project area is within the jurisdiction of Caltrans District 5, the County of San Luis Obispo, and the County of Santa Barbara. Any repairs to the roadway network that would facilitate the movement of construction vehicles would be subject to approval by the responsible public agency, and any construction work within the right-of-way of any public roadway would require an encroachment permit from the responsible agency.	Consistent	The Project would take place at multiple locations within both San Luis Obispo County and Santa Barbara County. If the construction work associated with the Project would encroach within the road right-of-way (for example, driveway improvements), PG&E would obtain an encroachment permit from the responsible agency, consistent with Caltrans District 5, San Luis Obispo, and Santa Barbara County regulations. Therefore, the Project is consistent with this requirement.
San Luis Obispo Council of Governments 2019 Regional Transportation Plan (RTP). The RTP provides a vision for future growth and development in the San Luis Obispo area through the year 2045 and is the long-term blueprint for the region's transportation system. Freight/Commodity Movement Action 5 Support mitigation of the impacts of freight rail on the efficiency of movement for passenger trains.	Consistent	The Project proposes no permanent alterations to highways, streets, and roads. Transportation by barge, truck, and rail from DCPP to off-site facilities associated with the Project would be consistent with the 2023 RTP. *Action 5*: While the Project would generate new freight rail traffic, the Project itself would not require those shipments to occur at the expense of passenger trains. These decisions are determined by the railroad owner (UPRR) and are subject to agreements with local, state, and federal entities. Therefore, the Project is consistent.
Santa Barbara County Association of Governments Connected 2050. This plan provides a vision for the region's future that balances transportation and housing needs with social, economic, and environmental goals. Policy 2.1.2 Reduce congestion, especially on highways and arterials.	Consistent	Transportation by barge, truck, and rail from DCPP to off-site facilities associated with the Project in the Santa Barbara region would be consistent with the Connected 2050 Plan. As shown in Table 4.16-2 below, the Project would decrease the number of automobiles using the roadway system, due to the reduction in

Table 4.16-1. Consistency with Applicable Programs, Plans, Ordinances, and Policies

Plan/Policy	Consistent?	Discussion
Policy 2.4.1 Freight and Goods Movement. Making efficient use of existing transportation system. Policy 2.4.5 Considering freight and goods movement in the design and planning of projects.		DCPP employee commutes. Trucking activity would use existing transportation facilities, including existing road and rail infrastructure, and the VMT generated by Project trucks is considered in this EIR.
County of San Luis Obispo Framework for Planning (Inland). The County's Framework for Planning (Inland) was amended in 2015 and includes the Land Use and Circulation Elements of the County's General Plan. Policy M. OTHER TRANSPORTATION MODES In addition to streets, public transit and airports, other transportation modes affecting land use planning include harbors and seaports, pipelines, trans-mission lines, rail and transport-ation terminals. The area plans contain policies for the local development and use of those systems. The Regional Transportation Plan con-tains a specific discussion of issues, programs and policies for those components of the county circulation system. The Framework for Planning (Inland) Resource Management System establishes Levels of Severity for monitored public resources. The Level of Severity for roadways is based on LOS "D". The Framework states that the County of San Luis Obispo Public Works Department should evaluate roadway capacity improve-ments if this LOS level is met.	Consistent	Transportation by barge, truck, and rail from DCPP to off-site facilities associated with the Project in San Luis Obispo County would be consistent with Policy M of the County's Framework for Planning (Inland), as the Project would not preclude the County of San Luis Obispo from enacting the Circulation Element. The Project would reduce demand on the County's roadway system by reducing the number of employees commuting to the DCPP site. As shown in Table 4.16-2 below, this would decrease the number of cars on County roadways and reduce roadway congestion.
County of San Luis Obispo Avila Beach Community Plan. This Community Plan establishes a vision for guiding land use and transportation in Avila Beach over the next 20 years.	Consistent	Transportation by barge, truck, and rail from DCPP to off-site facilities would be consistent with the Avila Community Plan. The Project would reduce the number of automobiles using roadways in the Avila Beach Community Plan area by reducing the number of employees commuting to the DCPP site. This would increase the efficiency of the existing transportation system and would be consistent with the circulation system resource management deficiencies identified in the plan.
County of Santa Barbara Comprehensive Plan Circulation Element. The Comprehensive Plan Circulation Element was adopted in 2014 and provides goals and policies for the circulation system.	Consistent	Transportation by truck from DCPP to off-site facilities associated with the Project in Santa Barbara County would be consistent with this element. Although the Circulation Element still identifies

Table 4.16-1. Consistency with Applicable Programs, Plans, Ordinances, and Policies

Plan/Policy	Consistent?	Discussion
		delay-based thresholds for roadways and intersections that are no longer permissible as impacts under CEQA, the Project is consistent with these standards because truck trips, which would occur within unincorporated Santa Barbara County, are limited and periodic, and typically would occur outside of the peak hours.
City of Pismo Beach General Plan Circulation Element. The Circulation Element was adopted in 2014 and provides goals and policies for the circulation system. Guiding Policy 1.3, Citywide Level of Service (LOS). Achieve and maintain a multimodal LOS "C" or better… Guiding Policy 4.1, Promote safe and efficient goods movement. Promote the safe and efficient movement of goods via truck and rail with minimum disruptions to residential areas. Implementing Policy 4.3, Hazardous Materials. The truck routes for hazardous materials shall be limited to US-101. The City shall request Caltrans to remove State Route 1 as a designated hazardous materials route.	Consistent	Although the Circulation Element still identifies delay-based thresholds for roadways and intersections that are no longer permissible as impacts under CEQA, the Project is consistent with these standards because truck trips, which would occur within the city, are limited and periodic, and largely would occur outside of the peak hours. Transportation by truck from DCPP to off-site facilities associated with the Project in Pismo Beach would be consistent with Guiding Policy 4.1. The Project involves a small number of daily truck trips that would have a minimal impact on local roadways and would avoid peak hours and pick-up and drop-off timeframes at Judkins Middle School. The trucks would primarily use highways and arterial streets without residential development. The Project does not interfere with the City's ability to implement this policy. Transportation of hazardous materials by truck associated with the Project would be consistent with Implementing Policy 4.3 and uses on US-101.
City of Santa Maria General Plan Circulation Element. The Circulation Element was amended in 2011 and provides goals and policies for the circulation system. POLICY C.1.b, Driveways and other Encroachments. Develop access standards regarding new drive-ways and other encroachments to arterial and collector streets so as to minimize conflicts that are detrimental to safe and efficient operating conditions.	Consistent	Any Project activities that would encroach within the road right-of-way would obtain an encroachment permit to minimize conflicts and would be consistent with POLICY C.1.b. The Project proposes the use of a SMVR facility for transportation to off-site disposal facilities and would not conflict with preservation of the SMVR right-of-way; therefore the Project would be consistent with POLICY C.6.e.1.

Table 4.16-1. Consistency with Applicable Programs, Plans, Ordinances, and Policies

Plan/Policy	Consistent? Discussion
POLICY C.6.e.1, Rail Transportation (Preserve the SMVR right-of-way). To preserve railroad and utility rights-of-way to provide for the development of a fixed light rail transportation system to serve the community. The phased implementation may include existing freight service, an open space corridor, multi-purpose trail (bicycling/ jogging), fixed bus route, and a light rail system.	

Source: OPR, 2018; Pismo Beach, 2018; San Luis Obispo, 1980a; San Luis Obispo, 1980b; San Luis Obispo, 2021; Santa Barbara, 2014; Santa Maria, 2011; SBCAG, 2021; SLOCOG, 2022; State of California, 1959; State of California, 1991.

4.16.3 Significance Criteria

Thresholds of significance to determine whether implementation of the Proposed Project would result in significant transportation and circulation impacts are based on the State CEQA Guidelines Appendix G checklist and measures established by the County of San Luis Obispo. Significant impacts to transportation would occur if the Proposed Project would:

- Impede achievement of existing circulation policy goals and objectives.
- Cause a net increase in VMT compared to the existing use.
- Add traffic to a roadway that has design features (e.g., narrow width, sharp curves, inadequate load capacity) that are incompatible with the type of Project vehicles (i.e., oversized trucks, heavy equipment) to be used.
- Alter site access and connections to local roads that would create or worsen a hazard, such as poor visibility of and for entering traffic, insufficient curb radii for turning vehicles, and conflicts with pedestrians and bicycles.
- Alter roadway conditions, such as the closure of both lanes of traffic of a roadway that serves as the primary ingress and egress for an area, resulting in inadequate emergency access.
- Reduce the existing level of safety for marine vessels or increase the potential for marine vessel accidents.

VMT Methodology and Discussion

Senate Bill 743 states that VMT reduction is needed to achieve State climate goals as travel per capita and passenger vehicle emissions have continued to grow despite improvements in vehicle fuel efficiency and other strategies to reduce emissions (California, 2013; OPR, 2018). VMT is a metric for understanding the total utilization of the road network. One vehicle mile traveled is a single vehicle traveling on a roadway for one mile, regardless of how many people are in the vehicle. Every vehicle traveling on the road generates VMT. However, for the purposes of CEQA, only the VMT generated by on-road passenger automobiles, which includes automobiles and light trucks, are considered for potential impacts (OPR, 2018). The more that travelers are able

to make the same trips by walking, bicycling, using transit, or carpooling, the less VMT increases even as new development occurs.

For the Proposed Project, VMT is being measured in terms of the typical passenger vehicle activity to and from the site by employees. The VMT generated from truck trips related to the decommissioning activity is additionally provided for informational purposes and is not considered for the purposes of CEQA, consistent with OPR guidance. The criteria detailed above states that the project will have a significant impact if there is a net increase in VMT compared to the existing use. In this case, the total VMT related to the Diablo Canyon Power Plant (and the related off-site materials handling facilities in either Pismo Beach or the Santa Maria Valley Railroad sites) is measured as the total mileage of all employee trips from their home to work location (and back again). The total miles of daily truck trips between the DCPP site and the off-site materials handling facilities and/or the "direct trucks" hauling materials directly to disposal sites is provided for information only, and includes all miles traveled for those purposes, including the miles traveled beyond California into neighboring states.

The significance criterion for the Proposed Project is based on total VMT because unlike typical development projects which seek to build new, replace, or intensify a land use (for example, building a new shopping center or replacing a surface parking lot with an office tower), the Proposed Project would remove the existing use over a relatively long period of time. As the site is decommissioned, employees and trucks would continue to travel to and from the site, but far fewer workers are required for the decommissioning activity compared with existing conditions. Furthermore, the remote location of the site (the Plant itself is approximately 7 miles into the project site along a winding roadway) limits the opportunity to improve efficiency for employees to reach the site. For example, although employees could (and do currently) carpool to the site, few if any could use public transit to reach work because of the distance from the nearest transit (as described in Section 4.16.1); the same is true for walking and bicycling.

4.16.4 Environmental Impact Analysis and Mitigation

Impact TRA-1: Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b) related to vehicle miles traveled (VMT); result in a net increase in VMT compared with the existing use (No Impact).

The Proposed Project would reduce and eventually remove most or all of the existing operations at the DCPP site, with the exception of the revised Owner-Controlled Area (see Figure 2-20) and Intake Cove/Marina. The total workforce related to DCPP decommissioning, even accounting for additional staffing needs of up to 24 staff at off-site locations (SMVR-SB site), is substantially lower in Phase 1 and even more so in Phase 2 compared to existing conditions.

Table 4.16-2 details all the VMT factors of the existing conditions and the Proposed Project. The total VMT includes regular daily activities, which is primarily employees driving to and from the DCPP site from their homes. Under existing conditions, most employees of the DCPP drive or carpool to the site daily. Under the Proposed Project, a reduced workforce would continue to drive or carpool to the DCPP site, while a small workforce of 10 staff would be added to the SMVR-SB site. The table shows these facilities and the additional employees under the Proposed Project Phases 1 and 2 required to support the materials transfer from truck to rail. Additionally,

Table 4.16-2 details the VMT generated by trucks during Phases 1 and 2, which are provided as a reference and were not considered for the purposes of CEQA.

Following Table 4.16-2 is an explanation of the assumptions for the existing employee VMT, followed by Phase 1 activities (employee trips) and Phase 2 activities (employee trips).

Table 4.16-2. Project Vehicle Miles Traveled (VMT) Generation

VMT Generator	Existing Conditions	Phase 1	Phase 2
DCPP			
Number of DCPP Employees	1,157	864	268
DCPP Employment VMT per Working Day (miles)	56,080	41,612	12,880
Santa Maria Valley Railroad (SMVR-SB) Facility			
Number of Additional Employees	-	10	-
SMVR Employment VMT per Working Day (miles)	-	485	-
Total Passenger Vehicle VMT			
Total VMT per Working Day (miles)	56,080	42,097	12,880
Change from Existing Conditions	-	*-25%*	*-77%*
DCPP Decommissioning Truck Activity (information only; not considered as a CEQA impact)			
Total Number of Decommissioning Truck Trips	-	391	1,882
Truck VMT per Working Day (miles)	-	403	307
Maximum Number of One-Way Daily Truck Trips	-	5	
Santa Maria Valley Railroad (SMVR-SB) Truck Activity			
Number of Decommissioning Truck Trips[1]	-	37	-
Truck VMT per Working Day (miles)[1]	-	2	-
Maximum Number of Monthly Trips[1]	-	15	-
Pismo Beach Railyard Truck Activity (Contingency)			
Total number of PBR Contingency Site Truck Trips[2]	-	6,072	-
Truck VMT per Working Day (miles)[2]	-	134	-
Maximum Number of One-Way Daily Trips	-	5	-
Total VMT Inclusive of All Employee and Truck Activity (information only)			
Total VMT per Working Day (miles)[3]	56,080	43,310	13,187
Change from Existing Conditions	-	*-23%*	*-76%*

Source: PG&E, 2021e.

[1] A maximum of 99 truck trips to SMVR-SB is assumed based on Table 2-7. Of these 99 trips, 62 trips (20+42) may be direct trucked to their final destinations out of California instead of to SMVR-SB and then by rail. A more conservative VMT analysis is provided by assuming these 62 trips out of the 99 total are entirely trucked to the final destination, which would be greater than the VMT if all 99 trips went to SMVR-SB and then by rail.

[2] The Applicant plans to use the PBR as a contingency site only for the transport of non-radioactive and non-hazardous decommissioning waste. Truck and employee trips to the PBR would only occur if the site is utilized.

[3] Total VMT includes the use of the PBR contingency site. The total VMT would be less if the PBR site is not used, as PBR materials would primarily be shifted from ocean barge to rail via truck. These short trucking trips from the DCPP to the PBR would generate additional VMT when compared to the ocean barge transportation option.

Existing DCPP Operations

Under existing conditions, the main generator of total daily VMT for the Proposed Project is employee trips between home and the DCPP site. PG&E provided employee residential ZIP code data to estimate the existing VMT of employees commuting to the DCPP site (PG&E, 2021e). DCPP operates 24 hours a day year-round, and currently employs 1,157 workers (as of the 2021 CDP Application), but generally employs up to approximately 1,400 workers under typical operating conditions. A substantial number of employees using vanpool services to commute to work based on information provided by PG&E. To account for these vanpool services and carpooling, an estimate of 1.4 employees per vehicle was used to calculate the VMT generated by existing employees at the DCPP site. Employee commute trip lengths were calculated from the ZIP code data provided PG&E, with the centroid (spatial center) of each ZIP code used to estimate the average employee commutes. Commute distances were calculated using geographic information system (GIS) software and are based on existing roadways in the region. The ZIP code centroids were adjusted to account for the geography of the Central Coast region, as the center of some ZIP codes in the area are located within mountain ranges. Table 4.16-2 shows the estimated VMT generated by employees from the DCPP site's existing operations.

Figure 4.16-15 shows the distribution of current DCPP employees home locations by ZIP code. The map shows how, partly due to the geography of the Central Coast region and often indirect or winding highways, some employees may live relatively far from the DCPP. During the Proposed Project, the decommissioning workforce is anticipated to have a similar distribution of home location.

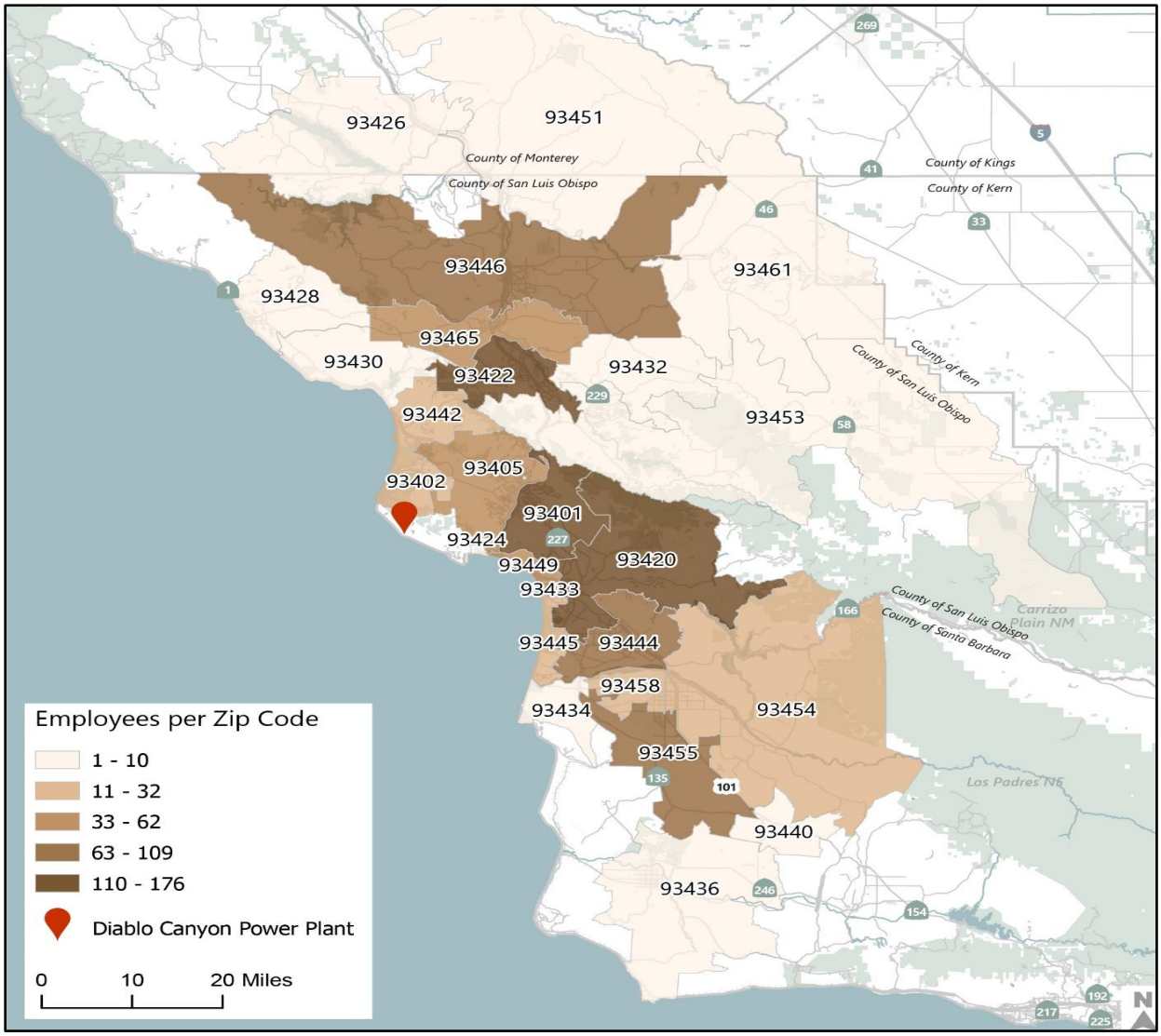
Phase 1

DCPP Project Site

During Phase 1 of the Proposed Project, the on-site employees would decrease from current conditions of approximately 1,157 employees to approximately 870. Table 4.16-2 displays the reduced number of employees at the DCPP site during Phase 1 of the Proposed Project and the estimated VMT they would generate. The residential location of Phase 1 employees is assumed to have a similar home ZIP code distribution as the residential location of existing employees.

During Phase 1, PG&E intends to move materials via truck and barge to several waste facilities in the western United States. Some of these materials would be moved directly by truck to the designated waste facilities via the Interstate and State highway systems, while other materials would be trucked locally to the PBR and/or SMVR-SB site to be transported to the designated waste sites via rail.

Figure 4.16-15. DCPP Employee Existing Conditions Distribution



Source: PG&E, 2021e.

Construction trips are typically not evaluated for VMT generation for the purposes of CEQA due to their temporary and essential nature as part of a development project. However, because of the duration and intensity of the decommissioning activities, the VMT generated by trucks moving material from the DCPP site to waste facilities has been provided for informational purposes. PG&E provided the locations of these waste facilities and the number of trucks required to move the materials. The number of the truck trips to each waste facility was multiplied with the round-trip distance to those facilities from the main DCPP Access Gate on Avila Beach Drive. Additionally, the approximately 7-mile distance from this gate to the DCPP site was added to these calculations. Finally, the mileage was divided by the 1,456 working days in each project phase, accounting for a four-day working week over seven years, to provide a daily VMT estimate.

As shown in Table 4.16-2, the VMT produced by staff commuting to the DCPP site during Phase 1, is less than the VMT produced by the existing operations of the DCPP. For this reason, Phase 1 of the Proposed Project at the DCPP site would result in a reduction of VMT. No impact would occur.

Railyards

Pismo Beach Railyard. The Proposed Project may use the PBR facilities as a contingency site in place of transport of approximately 122,000 tons of non-radiological, non-hazardous waste via ocean barge from the DCPP site. As a contingency, these materials may be trucked to the PBR to be transported via railroad to the waste facilities, replacing the barge trips assumed in the base Proposed Project. No additional employees would be required at the PBR facility for its operations.

Table 4.16-2 displays these potential truck trips, and the VMT they would generate if these materials were transported through the PBR for reference purposes. Although daily VMT and truck trips would be higher in Phase 1 with the contingency use of PBR rather than the barge trips, the total VMT remains below existing conditions and therefore Phase 1 of the Proposed Project at the PBR site would result in no impact.

SMVR-SB. The Proposed Project would transport materials through the SMVR facility. Approximately 10 temporary employees would be needed at the site for operational and security purposes, and these employees would generate a small amount of VMT.

Table 4.16-2 displays the additional VMT generated by these railyard employees. The residential locations of these employees have been estimated using the existing DCPP site employee ZIP code data provided by PG&E. The SMVR-SB site is approximately 30 miles south of the DCPP site.

Table 4.16-2 displays the total estimated VMT generated by Phase 1 of the Proposed Project. As shown in Table 4.16-2, the total daily VMT generation estimate for passenger vehicles of 41,612, is lower than the existing operations of the DCPP site. For this reason, Phase 1 of the Proposed Project would result in a reduction of VMT. No impact would occur.

Phase 2

DCPP Project Site

Phase 2 of the Proposed Project would result in a further reduction in staffing levels at the DCPP site to approximately 270. Table 4.16-2 displays the reduced number of employees at the DCPP site during Phase 2 and the estimated VMT they would generate. The residential location of Phase 2 employees is assumed to have a similar ZIP code distribution as the residential location of the DCPP site's existing employees.

During Phase 2 of the Proposed Project, materials would continue to be transported from the DCPP site to the designated waste facilities by direct truck via the Interstate and State highway systems. Although Phase 2 increases the number of truck trips when compared to Phase 1, the VMT generated by those trucks is less than Phase 2 due to shorter journeys. These Phase 2 trucks include 1,760 trucks needed to move topsoil from locations in San Luis Obispo County to the DCPP site. The VMT generated by Phase 2 trucks is displayed in Table 4.16-2 for reference purposes. Unlike Phase 1, Phase 2 would not use the SMVR-SB or PBR facilities to transport materials. As displayed in Table 4.16-2, the VMT produced by staff commuting to the DCPP site during Phase 2 of the Proposed Project, is estimated to be 12,880, which is less than the VMT produced by the

existing operations of the DCPP site. For this reason, Phase 2 of the Proposed Project at the DCPP site would result in a reduction of VMT. No impact would occur.

Railyards

Unlike in Phase 1 of the Proposed Project, Phase 2 would not use any railyards (i.e., no materials would be moved by rail) and no additional staffing at any of the railyards is required. As such, there is no estimated VMT generated by the railyard facilities during Phase 2 of the Proposed Project. No impact would occur.

Post-Decommissioning Operations

New Facility Operations. Following Phase 2, the resulting activity on site associate with the Proposed Project (i.e., GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings) would remain less than existing conditions and would therefore generate fewer daily VMT than existing conditions. No impact would occur.

Future Actions. Future use of the Marina by a third party may involve up to 200 people per day, including up to five employees. It is reasonable to assume based on the region that the trip lengths and patterns of these daily visitors would be similar on average to the DCPP employee trip distribution assumptions. Reuse of the Marina, based on PG&E's assumption of 200 users per day, is expected to generate fewer daily VMT than existing conditions. The addition of up to 200 daily visitors, assuming every single visitor drove alone (which is unlikely for a recreational activity such as open-ocean boating), would still be less than half the number of daily vehicle trips in Phase 2, which remains substantially less than existing conditions. No impact would occur.

Mitigation Measures for Impact TRA-1. No mitigation measures are required.

Impact TRA-2: Add traffic to a roadway that has design features that are incompatible with the type of Project vehicles to be used (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

PG&E intends to transport decommissioning debris and waste off site via a combination of barge, truck, and truck-to-rail. All trucks (including those used to move waste to rail facilities) would use existing roadways between the DCPP site and US-101. Trucks would leave the DCPP site using the internal Diablo Canyon Road/Diablo Ocean Drive, which is a paved, 7-mile two lane road that will be maintained to support decommissioning truck traffic. Trucks would then use Avila Beach Drive, which is an arterial road, to access US-101. As discussed in Section 2.3.19.2, *Waste Transportation*, haul trucks would be limited to off-peak traffic hours, which minimizes potential hazards. The level of truck activity departing the DCPP site correlates to a few trucks per day over the course of the entire Project. Avila Beach is a relatively isolated community with only Avila Beach Drive providing public access to the community and DCPP, and the community experiences significant seasonal traffic demand. Avila Beach Drive is in some places only approximately 34 feet wide, which is sufficient only for one travel lane in each direction plus a sidewalk on one side, and there are significant lengths where there is no separated sidewalk where vehicles may be parked with a significant amount of foot traffic and bicyclists during the busy season. Project-

related truck trips, even at only a few trucks per day, could create a regular incompatibility with the coastal road that must safely accommodate pedestrians, bicyclists, tourist traffic and trolley circulators, parked cars and RVs, local residents, and emergency responders.

Mitigation Measure (MM) TRA-1 requires preparation and implementation of a Transportation Management Plan (TMP) that would define the allowable hours and days for truck transportation (oversize loads or any other trips that would require temporary road closures are addressed under Impact TRA-3 and MM TRA-2). With the implementation of MM TRA-1 and MM EM-2 (*Project Plan Updating, Tracking, and Reporting*), specifically for the TMP required under MM TRA-1), the Proposed Project would not result in inadequate emergency access, and the impact would be reduced to a less than significant level (Class II).

Railyards

Pismo Beach Railyard. The PBR site is owned by PG&E and is currently used as an office and equipment storage location. Proposed Project improvements to this site would be limited to the refurbishment and replacement of existing rail track. Vehicles would enter the PBR site through the existing Bello Street driveway. As discussed in Section 2.3.4.2, *Pismo Beach Railyard Modifications*, haul trucks would be limited to off-peak traffic hours (i.e., no shipments to PBR 7:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.) and would avoid morning drop-off and afternoon pickup periods for Judkins Middle School, which minimizes potential hazards. The level of haul truck activity in the event the PBR site is used (contingency if barging is not the primary method of transport from the DCPP site) would be up to five round trips daily, which does not represent a substantial increase in hazards to a site that already handles truck activity. To ensure truck trips are appropriately restricted, MM TRA-1 would require the preparation and implementation of a plan specifying hours for truck traffic outside of peak hours. Therefore, the impact would be reduced to a less-than-significant level (Class II).

SMVR-SB. As shown in Figure 2-13, the Proposed Project includes improving the existing driveway to the SMVR-SB site off Betteravia Road, approximately 600 feet west of Stinton Road and refurbishing the existing track. The upgraded driveway would accommodate trucks turning to and from Betteravia Road onto the railyard site. These improvements would follow applicable roadway and site design standards. Additionally, as discussed in Section 2.3.4.1, *Santa Maria Valley Railyard Modifications*, haul trucks would be limited to off-peak traffic hours (i.e., no shipments to SMVR-SB 6:00 a.m. and 8:00 a.m. or between 4:00 p.m. and 5:30 p.m.). To ensure truck trips are appropriately restricted, MM TRA-1 would require the preparation and implementation of a plan specifying hours for truck traffic outside of peak hours. Therefore, the impact would be reduced to a less-than-significant level (Class II).

Phase 2

Phase 2 consists of activities to restore portions of the DCPP site to a natural condition and the continuation of Discharge Structure removal and restoration activities. This includes soil remediation to remove radiological and non-radiological contamination and the completion of Final Status Surveys to verify all radiological materials have been removed. The Proposed Project also includes the addition of a blufftop road segment that would connect Shore Cliff Road and

North Ranch Road/Pecho Valley Road to provide more direct emergency vehicle access to and from the north, outside of the revised Owner-Controlled Area. This emergency vehicle access route would continue to provide an alternative route out of the DCPP site if the main Diablo Canyon Road/Diablo Ocean Drive were to be out of service. This new roadway segment would be designed to applicable standards and therefore would not be unsafe. See also the emergency evacuation discussion in Section 4.17, *Wildfire*. Phase 2 activities would also include grading and landscaping to restore excavated areas and the installation of post-construction stormwater controls. Phase 2 activities that would involve trucking would remain subject to MM TRA-1, which requires preparation and implementation of a plan specifying hours for truck traffic outside of peak. Therefore, the impact would be reduced to a less-than-significant level (Class II).

Post-Decommissioning Operations

New Facility Operations. Following Phase 2, the resulting activity on site associate with the Proposed Project (i.e., GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings) would remain less intense than existing conditions and is anticipated to be limited to typical employee, visitor, and delivery traffic and vehicle types. No impact would occur.

Future Actions. The Marina facilities would be accessed by Diablo Canyon Road, which can accommodate trailers carrying boats to and from the Marina, with up to the approximately 200 daily users assumed. As such, operation of the Marina would not add traffic that is incompatible with the public roads to be used, and there would be no impact.

Mitigation Measures for Impact TRA-2.

EM-2 **Project Plan, Updating, Tracking, and Reporting.** See Section 3. For Impact TRA-2, MM EM-2 will be implemented to track the compliance activities and reporting of the TMP required under MM TRA-1.

TRA-1 **Truck Transportation Outside of Peak Hours.** Prior to the issuance of any decommissioning permit, the Applicant or its designee shall prepare and submit a Transportation Management Plan (TMP) to address truck transportation outside of peak hours to be reviewed and approved by the jurisdictions responsible for the relevant public roadways, such as the County of San Luis Obispo and Caltrans. The TMP shall require all decommissioning-related truck transportation to avoid the peak days and hours as specified below. Specialty Heavy-Haul Transport Vehicles are a component of the TMP and are further addressed in MM TRA-2.

Avila Beach Drive

- Between the hours of 7:00 a.m. – 8:30 a.m. and 3:00 p.m. – 6:00 p.m.
- Saturdays and Sundays
- State and federal holidays
- Fridays after 12:00 p.m. (noon) preceding a Monday state or federal holiday
- Any weekdays after 12:00 p.m. (noon) preceding a state or federal holiday

Pismo Beach Railyard, if used

- 7:00 a.m. – 9:00 a.m.
- 3:00 p.m. – 6:00 p.m.

- Morning and afternoon student drop-off and pick-up periods at Judkins Middle School (morning drop-off approximately 8:30-9:30 a.m. Monday and 7:30-8:30 a.m. Tuesday-Friday; afternoon pickup approximately 2:00-3:00 p.m. Monday-Friday and 11:00 a.m. – 12:00 p.m. on Minimum Days), which must be confirmed with school administration prior to the start of each semester including days of early release or special schedules.

Santa Maria Valley Railyard – Betteravia Industrial Park (SMVR-SB)

- 7:00 a.m. – 9:00 a.m.
- 3:00 p.m. – 6:00 p.m.

Impact TRA-3: Alter roadway conditions, such as the closure of both lanes of traffic of a roadway that serves as the primary ingress and egress for an area, in a way that would result in inadequate emergency access (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

Proposed Project activities at the DCPP site would take place on the existing power plant site. No permanent alteration to existing public roadways would occur as a result of the Proposed Project.

There would be regular trucking activity entering and exiting the site between US-101 and the main DCPP Access Gate on Avila Beach Drive; however, the overall number of vehicle trips to and from the site is expected to be lower than existing conditions as described in Impact TRA-1. Generally trucking activities would be limited to off-peak periods per MM TRA-1 and distributed across a period of years, unlike a typical building construction project that would have a relatively short but highly intensive period of trucking activity. Queues of trucks or employees on Avila Beach Drive to enter the DCPP site are not anticipated during any period of the Proposed Project. The main DCPP Access Gate would continue its normal operations for employee screening, and truck screenings are expected to take approximately 30 seconds or less to complete per truck (PG&E, 2022c – DR#8, Transportation 2). Therefore, under normal circumstances during the Proposed Project, there would not be roadway changes or traffic conditions that would obstruct emergency access.

However, there would be up to 79 specialty heavy-haul transport vehicle round trips involving oversize loads of approximately 20 feet wide. The use of these vehicles would require PG&E to obtain a permit from Caltrans for oversize/overweight vehicles and the consideration of the use of these vehicles in the Transportation Management Plan (TMP) prepared for the Proposed Project. The width of these vehicles would require some streets, such as Avila Beach Drive which has a 22-foot-wide travel way (one lane in each direction), to be closed in both directions up to 158 times (one for each inbound and outbound trip, comprising 79 round trips). Avila Beach Drive is the only roadway west of San Juan Street providing access to not only DCPP but also Port San Luis, beachfront, the Avila Beach Resort and other land uses. Therefore, a full roadway closure could briefly delay or restrict emergency response access or public egress in case of an emergency, particularly while the oversize load vehicles cross the bridge over San Luis Creek which may not have sufficient width for emergency vehicles to pass while an oversize truck is on it

(approximately 24-feet-wide with no shoulders). Furthermore, many vehicles are typically parked along the shoulder west of this bridge, which could also impede the ability for emergency vehicles to pass an oversize truck.

MMs TRA-2 through TRA-5 require the preparation and implementation of a TMP in consultation with jurisdictions responsible for the relevant public rights-of-way, as well as providing a decommissioning liaison, advanced notification and quarterly updates of decommissioning activities to property owners, residences, and businesses along local transportation routes. The TMP would fully define emergency access, would provide direction in the event emergency vehicle need to access the area, would include the allowable days and times for roadway closures and the necessary traffic control measures need to implement those closures, and appropriately prepare emergency response units to be mobilized on either side of the closure as needed. With the implementation of MMs TRA-2 through TRA-5 as well as MM EM-2 (*Project Plan, Updating, Tracking, and Reporting*, specifically for the TMP required under MM TRA-2), the Proposed Project would not result in inadequate emergency access, and the impact would be reduced to a less-than-significant level (Class II). See also the emergency evacuation discussion in Section 4.17, *Wildfire*.

Railyards

Pismo Beach Railyard. Material would be hauled from the DCPP site to the PBR site by truck (if this contingency site is used); no specialty heavy-haul transport vehicles would go to the PBR site. The materials hauling trucks would travel with normal truck traffic and move aside for emergency vehicles. Any construction activities associated with the Project and transportation of materials hauling would be intermittent (with some periods of activity but not continuous for the entire period of decommissioning) and would not result in road closures, impacts to site access, or traffic conditions that would result in delay. As noted in Section 2.3.4.2, *Pismo Beach Railyard Modifications*, a maximum of five truck trips per day are anticipated at the PBR site, and these truck trips would not enter or leave the PBR site during peak traffic periods on weekdays (7:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.) or during the morning drop-off and afternoon pickup periods for students at Judkins Middle School.

Trucks would enter the PBR via the existing driveway on Bello Street and would use a security gate that is opened via a security key card. Trucks would be processed in approximately 30 seconds or less and there is no expected queuing of trucks (PG&E, 2022c – DR#8, Transportation 4). With this level of trucking activity and no additional employee traffic, the activities would not block emergency response vehicles that need to pass. Thus, the Proposed Project would not result in inadequate emergency access, and the impact would be less than significant (Class III). See also the emergency evacuation discussion in Section 4.17, *Wildfire*, under Impact WF-1.

SMVR-SB. Material would be hauled from the DCPP site to SMVR-SB by truck. The materials hauling trucks would travel with normal truck traffic and move aside for emergency vehicles. Any construction activities associated with the Proposed Project and transportation of materials hauling would be intermittent and would not result in road closures, impacts to site access, or traffic conditions that would result in delay. A maximum of 99 truck trips would occur between 2024-2029 (see Table 2-7). There would be an average of one to six shipments

per month, with the possibility that a maximum of 15 shipments could occur in any month. Trucks trips would not occur between 6:00 a.m. and 8:00 a.m. or between 4:00 p.m. and 5:30 p.m. on weekdays.

Oversize materials hauling trucks (up to 79 trips described above) would include a California Highway Patrol escort during their journey within California and the trucks would move aside for emergency vehicles, following the same discussion outlined above. Although the planned route between US-101 and the SMVR-SB site is not the only public roadway access for the area, road closures could still have an effect on emergency response. MMs TRA-2 through TRA-5 would still apply as described above. Thus, the Proposed Project would not result in inadequate emergency response, and the impact would be reduced to less than significant (Class II).

Phase 2

Phase 2 consists of activities that would restore portions of the DCPP site to a more natural condition and the continuation of Discharge Structure removal and restoration activities. This includes soil remediation to remove radiological and non-radiological contamination and the completion of Final Status Surveys to verify all radiological materials have been removed. Phase 2 activities would also include grading and landscaping to restore excavated areas and the installation of post-construction stormwater controls. Phase 2 includes a total of 122 truck trips over a seven-year timeframe (see Table 2-7). Any construction and trucking activities associated with Phase 2 would be intermittent; would occur outside peak periods per MM TRA-1; and would not result in road closures, impacts to site access, or traffic conditions that would result in inadequate emergency access. No oversize loads requiring use of specialty heavy-haul transport vehicles are anticipated during this phase, although these would be covered by the TMP per MM TRA-2.

The blufftop road segment, which would be constructed during Phase 2, would provide emergency vehicle access from Avila Drive and from Montaña de Oro State Park. North Ranch Road/ Pecho Valley Road would continue to operate as a private road and would not be available for public use. In the event Diablo Canyon Road/Diablo Ocean Drive were to be closed, the proposed blufftop road segment could facilitate evacuation of the DCPP site without needing to travel the more indirect route around the revised Owner-Controlled Area. As described in Section 2.4.7, *Blufftop Road Segment*, the blufftop road connection requires a crossing of Diablo Creek to connect with North Ranch Road/ Pecho Valley Road. The existing culvert/bridge structure has been blocked for security purposes for decades. Its structural condition for handling traffic including fire apparatus and other emergency vehicles is unknown and could further deteriorate over the time between the beginning of decommissioning and Phase 2. Therefore, the culverted road segment over the Diablo Creek may not provide adequate emergency access. MM TRA-6 (*Diablo Creek Crossing Structure Inspection and Repair*) is recommended, which requires PG&E to conduct a full engineering evaluation of the structure prior to the Phase 2 construction of the blufftop road segment and correct any deficiencies. As such, impacts would be reduced to a less-than-significant level (Class II).

Post-Decommissioning Operations

New Facility Operations. Following Phase 2, the resulting activity on site comprising the GTCC Storage Facility, Security Building, indoor Firing Range, and Storage Buildings would remain less than existing conditions. The course of regular operations does not include use of any oversize loads, hauling, or construction activities that would cause roadway conditions that result in inadequate emergency access. No impact would occur.

Future Actions. Due to the limited number of anticipated visitors to the Marina (assumed to not exceed 200 visitors per day), Diablo Canyon Road/Diablo Ocean Drive would provide adequate emergency access. Per Title 14 of the California Code of Regulations, Division 1.5, Chapter 7 and 2019 California Fire Code D107, a maximum of 250 people in a High Fire Hazard Severity Zone and 150 people in a Very High Fire Hazard Severity Zone is permitted before a formal secondary emergency access route is required. Operations at the Marina, which is located within a High Fire Hazard Severity Zone, would comply with these regulations based on PG&E limiting the third party to having no more than 200 people (see Section 4.17, *Wildfire*, Impact WF-1). Impacts are less than significant (Class III).

Mitigation Measures for Impact TRA-3.

EM-2 **Project Plan, Updating, Tracking, and Reporting.** See Section 3. For Impact TRA-3, MM EM-2 will be implemented to track the compliance activities and reporting of the TMP required under MM TRA-2.

TRA-1 **Truck Transportation Outside of Peak Hours**

TRA-2 **Specialty Heavy-Haul Transport Vehicle Transportation Management Plan.** Prior to the closure in both directions of a roadway that serves as the primary ingress and egress for an area or community, the Applicant or its designee shall prepare and submit a detailed Transportation Management Plan (TMP) to be submitted to the County of San Luis Obispo County Department of Planning and Building and the Department of Public Works for review and agency distribution, and shall be approved by the jurisdictions responsible for the relevant public roadways, such as the Planning and Building, and Santa Barbara County Public Works Departments, Port San Luis Harbor District, and Caltrans. This TMP shall include, but is not limited to:

- Waste classification and receiving facilities.
- Identification of haul truck trip routes, including the number of truck trips, the location of staging areas, and the specific destination of trucks carrying oversize/overweight loads.
- A monitoring program for street surface conditions to minimize damage to the roadway network, including inspection of the roadway prior to its closure, precautionary measures to protect roadways during the movement of materials, and provisions for the Applicant to repair all damage caused during the movement of materials by all oversize/overweight (extralegal) trucks.

- Traffic control plan. Avila Beach Drive has the following lane and road closure restrictions unless otherwise agreed upon by Public Works, where lane closures are not permitted:
  - Between the hours of 7:00 a.m. – 8:30 a.m. and 3:00 p.m. – 6:00 p.m.
  - Weekends (Saturday and Sunday)
  - State and Federal holidays
  - Fridays after 12:00 pm (noon) preceding Monday State and Federal holiday
  - Any weekdays after 12:00 pm (noon) preceding a State and Federal holiday
- Scheduling plan. A schedule for all specialty heavy-haul transport vehicle trips be provided at least one month in advance of the use of the transport vehicle to the San Luis Obispo and Santa Barbara County Public Works Departments and the Port San Luis Harbor District.
- Separate Single Trip Transportation Permit(s) will be required for oversized loads requiring lane closure and/or full road closure. An "extra legal load" analysis will be required for Avila Beach Drive bridge (RD-2070-BR1) to ensure the bridge is capable of supporting the oversized load.
- Full road closure may be allowed with prior approval from Public Works with following requirements:
  - Closure may occur between the hours of 10:00 p.m. – 5:00 a.m.
  - Provide a minimum two (2) week advance notification to Port San Luis Harbor District, public, and emergency services, which may include electronic message signs, press releases, etc.
  - California Highway Patrol escort.
  - Coordination with Public Works / Cal Fire / Office of Emergency Services for emergency ingress/egress of emergency vehicles and/or emergency evacuation for community of Avila Beach. This may include no parking signage along shoulders, maintaining a minimum 10-foot clear emergency travel lane adjacent to shoulder, etc.
- Traffic control plans that identify traffic control measures, such as flag persons, warning signs, barricades, cones, lights, and detour routes.
- Provisions for alternative pedestrian and bicyclist routes.
- Identify necessary parking restrictions and the location of relevant signage, including no parking signage along Avila Beach Drive shoulders, maintaining a minimum 10-foot clear emergency travel lane adjacent to shoulder during road closures. Signs must be placed 48 hours in advance of all road closures and removed immediately after the vehicle exits the road.
- Public notification in advance of the road closure, such as written notification to local residents in English and other relevant languages, online resources, and electronic message signs. The notification shall include a description of the work, dates and times the road will be closed, and relevant contact information.

TRA-3 **Decommissioning Liaison.** Thirty days (30 days) prior to the start of any decommissioning activities, and thereafter for the duration of the Project, the Applicant or its designee shall appoint a Decommissioning Liaison. Contact information for this liaison (or liaisons) such as a name, email, and toll-free general number shall be included on all project-related updates, mailings, and notices, as well as placed on the dedicated Project website. The identified liaison(s) shall:

- Act as a point of contact and interface between local residents and the DCPP decommissioning crews
- Be available both in person and by phone, as necessary, for at least 1 month prior to the start of decommissioning and for 6 months following the completion of the Project
- Respond to all Project-related questions and concerns within 3 business days when contact information is provided

In addition, the Applicant or its designee shall provide a quarterly update to the County Department of Planning and Building that summarizes all complaints, comments, and concerns communicated to the liaison(s) for the duration of decommissioning activities, and 2 times (once every 3 months) for the 6-month period following the completion of Project activities. The compliance documentation shall include the name and contact information of the person contacting the liaison(s), the date of contact, and what actions were taken by the liaison(s) to rectify or address the complaints, comments, or concerns expressed.

TRA-4 **Advance Notification of Decommissioning.** Thirty days (30 days) prior to the start of initial decommissioning activities, the Applicant or its designee shall give advanced notice of the start of decommissioning activities to property owners, residents, and businesses located along Avila Beach Drive and along the railyard transport routes (i.e., Price Canyon Road, Bello Street, and Betteravia Road), including but not limited to the residential and commercial uses identified in EIR Table 4.12-1. Notification shall be completed by placing ads in local newspapers, posting of notices at community facilities (e.g., libraries, community centers, recreation facilities), and direct mailings. The notification shall include the location, types, and expected duration of each decommissioning activity, inclusive of trucking activities and any scheduled road closures anticipated for the first 3 months following publication of the notification. The notification shall also include the toll-free general phone number and contact information for the Decommissioning Liaison(s) (see MM TRA-3), as well as an internet website address where additional Project information can be found.

TRA-5 **Quarterly Decommissioning Updates.** Each quarter following distribution of the advance notification of decommissioning, the Applicant or its designee shall provide property owners, residents, and businesses along transport routes, including but not limited to the residential and commercial uses identified in EIR Table 4.12-1, with updates to all current and scheduled decommissioning activities on the Project's website and by US Postal Service mail. Property owners, residents, and businesses along Avila Beach Drive and within the central Avila Beach community shall be provided updates every quarter for the duration of decommissioning activities. Property

owners, residents, and businesses along the railyard transport routes shall be provided updates every quarter for the duration of Phase 1 activities. The updates shall include the location, types, and expected duration of each decommissioning activity scheduled for the 3-month period following each update's publication date. The updates shall also include a toll-free number and the name and phone number of the Decommissioning Liaison(s) to respond to all Project-related questions and concerns.

TRA-6 **Diablo Creek Crossing Structure Inspection and Repair.** Prior to Phase 2 design of the blufftop road segment, the Applicant shall demonstrate to the County Department of Planning and Building that a qualified professional engineer has been retained to evaluate the condition of the embankment crossing and its appurtenant facilities which cross Diablo Creek north of the Plant. The engineer shall determine the suitability for the embankment structure to serve as an emergency vehicle access route and identify any repairs or upgrades required to serve in this capacity (see also MM HWQ-1, *Prepare and Implement Drainage Plans*, regarding confirmation of drainage conveyance stability and performance). The engineer shall document the condition and any repairs recommended in a report to the County Department of Planning and Building and Department of Public Works within 30 days of the completed evaluation. If any improvements are necessary to provide safe emergency access, the Applicant shall plan for and construct the improvements prior to completion of the blufftop road. The remedial improvements must be completed to the satisfaction of the County Department of Public Works within drainage plans (see MM HWQ-1).

Impact TRA-4: Reduce the existing level of safety for marine vessels because of offshore vessel use (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site and Offshore Barge Route

Waste Export

During Period 1B of the Proposed Project (2030-2033), various waste types would be exported by barge from the DCPP Intake Cove to the Port of Portland and the Port of Morrow in Portland and Boardman, Oregon, respectively, as shown in Figure 4.16-7. Ocean transport by barge reduces truck trips through the local community. Barge transport also enables the transport of large amounts of demolition waste in a short period of time (PG&E, 2021a).

The six types of waste that would be exported from the Project site include:

- Recyclable Material
- Hazardous Waste (Class B/C)
- Low Activity Radioactive Waste (LARW)
- Licensed Class A Waste
- Clean Material (non-radioactive)
- Other regulated waste

Of the six waste types, three are radioactive: LARW, Class B/C, and Licensed Class A Waste. Each of the six waste types would be packaged in separate sealed containers, and thus multiple waste types may be transported on one barge (PG&E, 2022d).

The amount of waste by type that would be transported by barge is listed in Table 4.16-3. Recyclable material would be offloaded in the Port of Portland and would be transported by rail to a recycling facility in Salt Lake City, Utah. From the Port of Morrow, waste would be transported by rail to disposal facilities in Idaho (hazardous waste and LARW) or Utah (Licensed Class A Waste). Clean material (i.e., non-radiological waste) would be transported by truck from the Port of Morrow to landfills in the Columbia Gorge area, also located in Boardman, Oregon (PG&E, 2021a). The Columbia Gorge landfills would accept non-detect (i.e., below detectable limits) general debris and were chosen because of their proximity (less than 40 miles) to the barge offload location at the Port of Morrow (PG&E, 2022a).

Waste transported by barge would be loaded into sealed 20-foot intermodal containers in compliance with 46 CFR Parts 145 through 155 and placed onto a pair of 72-foot-wide by 260-foot-long barges (PG&E, 2021c).

Table 4.16-3. Amount of Waste Transported by Barge Per Type

Waste Classification	Tons	Destination
Recyclable Material	105,144	By barge to the Port of Portland (Portland, Oregon) and then by rail to a major recycling facility in Salt Lake City, Utah
Hazardous/Regulated Waste	19,594	By barge to the Port of Morrow (Boardman, Oregon), and then by rail to US Ecology Idaho
Low Activity Radioactive Waste (LARW)	256,920	By barge to the Port of Morrow (Boardman, Oregon), and then by rail to US Ecology Idaho
Licensed Class A Waste	103,118	By barge to the Port of Morrow (Boardman, Oregon), and then by rail to Energy Solutions in Clive, Utah
Clean Material	12,223	By barge to the Port of Morrow (Boardman, Oregon), and then by truck to the Columbia Gorge Landfill (in Boardman, less than 40 miles from the port) [1]
Total	**496,999**	

Source: PG&E, 2021a, 2021d, and 2022a (see Project Description Table 2-8).

[1] There are five landfills in the Columbia Gorge area; waste could be transported to one or multiple landfills in the area.

The loading of waste containers from the Intake Structure into an ocean transport barge would take approximately 4 days for each barge (Ramboll, 2022). Two empty barges would be brought to an offshore mooring in Avila Bay/Port San Luis and would only be transported to the DCPP Intake Cove when sufficient waste containers are filled and ready for loading. One barge would be moored directly to the face of the Intake Structure by a tug and secured to the bumpering system for loading of materials using a crane installed on top of the Intake Structure (PG&E, 2021a). Once the first barge is full, it would be moved over to the anchoring location in the southwest corner of the DCPP Intake Cove and secured through three mooring lines. At this point, the second barge would be brought from Avila Bay/Port San Luis, moored directly to the Intake Structure, and loaded by crane with the remaining waste containers. Once filled, the two barges

would be tied together, and the tug would transport them to Oregon (Ramboll, 2022). The barges would be tied one behind the other (single file, like a train) to allow them to maneuver safely out of the DCPP Intake Cove.

The tugs used would vary by use but are assumed to fall into the following three categories:

- **Ocean going tugs** with the horsepower to move two loaded barges through normal ocean conditions at the most efficient and economical pace.
- **River tugs** with the maneuverability to transport two loaded barges up the Columbia River. These tugs require greater maneuverability for river conditions, are "push-style" tugs rather than ocean-going tugs, with lower horsepower and specifically sized to accommodate the Columbia River locks.
- **Spotting tugs** would be used to bring empty and full barges in and out of the Intake Cove. These tugs are smaller, highly maneuverable, and better suited for handling the confined space of the DCPP Intake Cove.

To transport waste, the Proposed Project would require a total of 55 barges during Period 1B (2030-2033), as shown in Table 2-7. This equates to 28 round trips where each tug boat pulls two barges (last tug trip would only pull one barge or a total of 56 one-way trips) over the 4-year period when rounding the number of trips to the nearest whole number.

The barge routes to the Port of Portland (Portland, Oregon) and the Port of Morrow (Boardman, Oregon) are approximately 1,020 and 1,180 miles long, respectively, and would travel 50 nautical miles from the coastline in international waters (see Figure 4.16-7). Tugs that pull barges travel about 14 knots, or roughly 16 miles per hour, which equates to approximately 64 and 74 hours, respectively, or around 3 days for a direct one-way trip. Larger tugs are recommended to travel slower, at 10 knots or roughly 11.5 miles per hour, which equates to a direct one-way trip taking approximately 89 and 103 hours, respectively, or approximately 4 days (PG&E, 2022d).

Cofferdam Gravel

Within a 1- to 2-year timeframe during Period 1A of the Proposed Project (2024-2029), up to 15 barge round trips would be required to transport gravel by barge from the Port of Long Beach to fill the Discharge Structure cofferdam (with one tug boat pulling one barge for a total of 15 barges)The barge route would be approximately 321 miles long, one-way, and would extend 50 miles from the coastline in international waters (see Figure 4.16-8). Tugs that pull barges travel about 14 knots, or roughly 16 miles per hour, which equates to approximately 20 hours. Larger tugs are recommended to travel slower, at 10 knots or roughly 11.5 miles per hour, which equates to a direct one-way trip taking around 28 hours (PG&E, 2022d).

Discharge Structure Void Fill

To fill the void left in the bluff following removal of the Discharge Structure, three barge round trips (with one tug boat pulling one barge for a total of 3 barges) would be required to transport quarry rock of various sizes from the Connolly-Pacific Company (Co.) Quarry on Santa Catalina Island (see Table 2-5). . These barge trips would be completed within a 1-year timeframe during Period 1B of the Proposed Project (2030-2033). The barge route would be approximately 325

miles long, one-way, and would extend 50 miles from the coastline into international waters (see Figure 4.16-8). Tugs that pull barges travel about 14 knots, or roughly 16 miles per hour, which equates to approximately 20 hours. Larger tugs are recommended to travel slower, at 10 knots or roughly 11.5 miles per hour, which equates to a direct one-way trip taking around 28 hours (PG&E, 2022d).

Potential Impacts on Marine Vessel Safety

Potential Impacts to Near Ports. Project-related marine traffic may be limited to non-rainy seasons (e.g., summertime), which tends to be the ideal time for recreational boaters to recreate by the sea. While private boats are not allowed within the 2,000-yard security zone established by the US Coast Guard and US Department of Transportation (see Figure 4.16-9), recreational fishing vessels, pleasure crafts, and sailing activity originating from Port San Luis Harbor and Morro Bay Harbor sometimes occur within 4 nautical miles of the DCPP. In addition, barges used for the Proposed Project would be temporarily staged at Port San Luis Harbor (PG&E, 2021b). As described above, at least two empty barges would be stored at an offshore mooring in Avila Bay/Port San Luis for approximately one to two weeks to facilitate waste loading via a crane on the Intake Structure. The need for berthing and cargo space could result in longer wait times for berths or anchoring locations, congestion, and reduced safety for commercial and recreational port users at local ports, including Port San Luis Harbor, the Port of Portland, and the Port of Morrow. Recreational activity, particularly for fishing, may increase in the Columbia River during salmon runs; however, there is already consistent vessel traffic traversing through the river, and fisherman are likely aware of and accustomed to this type of traffic (PG&E, 2022d).

To reduce potential impacts, MM TRA-7 (*Coordination with Harbormasters*) would be implemented requiring PG&E to coordinate with the harbormaster for Port San Luis to notify them of increases to vessel traffic and barge staging activities. In addition, coordination with the Port of Portland and Port of Morrow would be required to inform them of the Project's vessel traffic activity. Once the final scheduling is complete, PG&E would develop a communications and traffic plan to coordinate with local port authorities on the timing of Project-related tug-barge departure and arrival (PG&E, 2022d). This would allow local port authorities to take any necessary steps to ensure that Project-related vessel traffic would not be greater than the ports' berthing and staging capacity. In addition, recreational fishers and boaters would be informed of potential interference with their recreational activities due to construction-related vessels in the Project area; therefore, these local operators could avoid construction areas or temporarily relocate fishing efforts.

While commercial and recreational vessel operators possess advanced communication and navigation capabilities, their need to adjust course due to potential delays caused by Project-related marine traffic would result in an inconvenience for these operators. Smaller commercial and recreational vessels can more easily change direction to avoid vessel collisions. In addition, the type, size, and material or waste loaded on the barge can influence what measures are in place to ensure maritime and environmental safety. Tugs and 250-foot barges can generally handle most types of weather but may need to be moved out of the DCPP Intake Cove during storms and large swells, potentially restricting the Project's offshore activities to non-rainy seasons (e.g., summer) or other times of calmer weather. With implementation of MM TRA-8 (*Marine Surveyor Assessment*), a marine surveyor would be contracted prior to tugging to provide

a detailed assessment of safe loading practices and optimal conditions for entering or leaving a dock at the DCPP Intake Cove, Port San Luis, the Port of Portland, and the Port of Morrow. Departures and arrivals of tugs would be coordinated with weather forecasts and scheduled within the appropriate weather window, decided upon by the marine surveyor, tugboat captain, and PG&E.

Potential Offshore Impacts. Barges for the Proposed Project would transit approximately 50 nautical miles from the coastline, in international waters (PG&E, 2021b), from California to the disposal sites in Oregon. In addition, barges to transport gravel from the Port of Long Beach and rock from Santa Catalina Island would also transit 50 nautical miles from the coastline (PG&E, 2022d). Therefore, barge transport under the Proposed Project would not interfere with shipping lanes off the California coast, which are generally 4 to 20 nautical miles offshore. Additionally, barges for the Proposed Project would not traverse through the Monterey Bay National Marine Sanctuary boundaries and would not interfere with the slower ocean tank barges that are approximately 15 to 25 nautical miles from shore. However, barges for the Proposed Project would be within the same area as offshore oil tankers carrying crude oil from Alaska (members of the Western States Petroleum Association, who have agreed to remain a minimum of 50 nautical miles from shore).

As described in Section 2.3.19.2, *Waste Transportation*, barge transport activities are required to comply with existing marine vessel safety regulations. As required by 33 CFR Part 160 (Ports and Waterways Safety), the US Coast Guard would be notified regarding any vessel movement connected with the Project's activities, including the transport of hazardous waste. A Notice to Mariners would be prepared which provides updates to navigational charts for other vessel operators to reference to ensure maritime safety so that vessel traffic imposed by the Proposed Project would not affect the navigational ability of other vessel operators. Also, in compliance with 33 CFR Part 83.10 (Traffic Separation Schemes), barges associated with the Proposed Project would be required to avoid crossing traffic lanes, or cross on a heading as nearly as practicable to right angles to the general direction of traffic flow; or if not using a TSS, avoid it by as wide a margin as is practicable. Through compliance with these regulations, potential impacts related to marine vessel safety would be substantially minimized.

Phase I Marine Transportation Summary

As stated previously, during Period 1A (2024-2029), up to 15 barge round trips from the Port of Long Beach would be required to transport gravel to fill the Discharge Structure cofferdam; and during Period 1B (2030-2033), three barge round trips from Santa Catalina Island would be required to transport rock to fill in the Discharge Structure area following removal. In addition, 28 barge round trips would be required to export waste during Period 1B (2030-2033 from the DCPP site to Portland and Boardman, Oregon. During the export of waste, two empty barges would also be staged at an offshore mooring in Avila Bay/Port San Luis and transported to the DCPP Intake Cove when sufficient waste containers are filled and ready for loading. The worst-case scenario for Project-related vessel traffic is an increase of 46 barge round trips over a span of 3 years, which is an average of 27 round trips annually, assuming both the cofferdam gravel and Discharge Structure fill are transported in one year.

During decommissioning activities, the barge routes to Portland and Boardman, Oregon, and from the Port of Long Beach and Santa Catalina Island, would be 50 nautical miles from the coastline, which would minimize interference with other marine vessels. Barge operations are also required to comply with existing marine vessel safety regulations, including coordination with the US Coast Guard and avoiding or minimizing the crossing of traffic lanes. In addition,). With implementation of MMs TRA-7 and TRA-8, which include coordinating with the harbor-masters at local ports and contracting with a marine surveyor to prepare safety assessments, barge transport associated with the Proposed Project would not reduce the existing level of safety for marine vessels or increase the potential for marine vessel accidents. Therefore, impacts would be less than significant (Class II).

Railyards

None of the activities at the railyards would require barge transport; therefore, Proposed Project activities associated with the railyards would not result in any impacts related to marine vessel safety.

Phase 2

A portion of the barge trips for the export of waste to Portland and Boardman, Oregon, and the import of rock from Santa Catalina Island for filling the Discharge Structure void, during Period 1B (2030-2033) may extend into Phase 2 (2032-2039). In addition, during the export of waste, two empty barges would also be staged at an offshore mooring in Avila Bay/Port San Luis and transported to the DCPP Intake Cove when sufficient waste containers are filled and ready for loading.

As discussed for Phase 1, the Proposed Project could increase marine vessel congestion, specifically during the non-rainy seasons when recreational boating is most popular. During decommissioning activities, the barge routes to Portland and Boardman, Oregon, and from Santa Catalina Island, would be 50 nautical miles from the coastline, which would minimize interference with other marine vessels. Barge operations are also required to comply with existing marine vessel safety regulations, including coordination with the US Coast Guard and avoiding or minimizing the crossing of traffic lanes. In addition, as stated previously, with implementation of MMs TRA-7 and TRA-8, which include coordinating with the harbormasters at local ports and contracting with a marine surveyor to prepare safety assessments, barge transport associated with the Proposed Project would be less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. The operations at the GTCC Storage Facility, Security Building, indoor Firing Range, and Storage Buildings would not affect marine vessel traffic; therefore, Proposed Project activities associated with these facility operations would not result in any impacts related to marine vessel safety.

Future Actions. PG&E proposes to retain the Breakwaters and Intake Structure as part of the Proposed Project. After decommissioning activities are complete and the Part 50 license s are terminated, a third party could improve the DCPP Intake Cove area and utilize the Marina. PG&E can authorize activities within the 2,000-yard security exclusion zone in coordination with the US

Coast Guard and US Department of Transportation (see Figure 4.16-9) and work with a third party to allow use of the Marina. While it is possible this zone could be reduced when the risk profile for DCPP goes down (i.e., by end of 2029 when all SNF is anticipated to be transferred to the ISFSI), any changes to the security exclusion zone (reduction or elimination) must be completed through federal government action (US Coast Guard and US Department of Transportation).

Improvements to the DCPP Intake Cove area could include new parking areas, bathrooms, and a boat hoist and provide new coastal access to with up to 200 persons per day visiting the Marina. Each of these improvements would be subject to separate land use and building permits. Use of the Marina by a third party for the deployment of boats, launching of watercrafts, and arrival of boats each day would increase marine vessel traffic compared to existing operations, which are generally limited to as needed delivery of oversized equipment to the DCPP, and would be used to transport waste from the Project site during decommissioning. In addition, the existing security exclusion zone currently does not allow private boats to enter the DCPP Intake Cove. Although marine vessel traffic could increase after a third party is approved to make DCPP Intake Cove improvements after decommissioning is complete, operations at the DCPP Intake Cove would be required to comply with applicable marine vessel safety regulations, including the Harbors and Navigation Code and Federal Inland Navigation Rules.

These regulations include various requirements for boat operations. A sailboat over 8 feet long and a boat/vessel with a motor must be registered with the Department of Motor Vehicles to legally operate in California waterways. In addition, boat operators are required to be 16 years of age or older and in possession of a California Boater Card (exceptions apply to sailboats, which have no age restrictions, and if a person 12 to 15 years of age is supervised by a person at least 18 years of age). Furthermore, life jackets are required at all times under California law for every child under age 13, except when they are wearing a harness on a sailboat, enclosed in a cabin, or on a vessel during an emergency rescue. A US Coast Guard-approved life jacket is required for anyone using a personal watercraft (i.e., jet ski) and anyone being towed behind a vessel. A whistle or other sound producing device is required on powered vessels, as well as an adequate muffler to meet state noise level requirements, a US Coast Guard-approved fire extinguisher, and the current vessel registration. Lastly, boaters would be required to comply with maximum speed limits and directions of travel, including additional speed limit reductions during times when visibility is low.

The future use of the DCPP Intake Cove would be conducted in compliance with existing marine vessel safety regulations, which would minimize impacts on marine vessel safety. Therefore, operations at the DCPP Intake Cove during post-decommissioning operations would be less than significant (Class III).

Mitigation Measures for Impact TRA-4.

TRA-7 **Coordination with Harbormasters.** The Applicant or its designee shall coordinate with the harbormaster for Port San Luis to notify them of increases to vessel traffic and barge staging activities. In addition, coordination with the Port of Portland and Port of Morrow is required to inform them of the Project's vessel traffic activity. Once the final Project scheduling is complete, a Communications and Vessel Traffic Plan shall be developed to coordinate with local port authorities on the timing of Project-related

tug-barge departure and arrival. Prior to the start of barge-related activities, the Communications and Vessel Traffic Plan shall be submitted to the County Department of Planning and Building, local harbormasters, and US Coast Guard for review and approval.

TRA-8 **Marine Surveyor Assessment.** The Applicant or its designee shall contract a marine surveyor prior to barge-related activities to provide a detailed assessment of safe loading practices and optimal conditions for entering or leaving the DCPP Intake Cove, Port San Luis, the Port of Portland, and the Port of Morrow. Departures and arrivals of tugs shall be coordinated with weather forecasts and scheduled within the appropriate weather window, decided upon by the marine surveyor, tugboat captain, and Applicant or its designee. Documentation that a marine surveyor has been contracted shall be submitted to the County Department of Planning and Building for review and approval prior to the start of barge-related activities.

4.16.5 Cumulative Impact Analysis

Geographic Extent Context

The geographic extent for ground transportation impacts are roadways, including local streets and highways; pedestrian facilities, including sidewalks and pedestrian trails; and bicycle facilities that would directly serve, or would be affected by, the decommissioning activities of the Proposed Project. Phase 1 of the Proposed Project would reduce the land use intensity of the DCPP site; therefore, employee commutes on surrounding roadways would not contribute to cumulative impacts. For ground transportation, the focus of the cumulative analysis is on impacts related to truck traffic. As listed in Table 3-1, the Orano System ISFSI Modifications (#1), which would occur during Phase 1, would cause additional truck trips hauling construction materials and equipment to and from the DCPP site. In addition, Table 3-1 indicates there are three transportation infrastructure projects located on roadways that would be used by Proposed Project trucks. Therefore, cumulative projects that are considered for cumulative ground transportation impacts include:

Diablo Canyon Power Plant

- Orano System ISFISI Modifications (#1)
- Avila Beach Drive at Highway 101 Interchange (#3)

Pismo Beach Railyard

- Signal at Bello and Price Canyon Road (#7)

SMVR-SB – Betteravia Industrial Park (County of Santa Barbara)

- Highway 101 – Betteravia Road Interchange (#17)

The geographic extent for cumulative impacts on marine vessel safety is the marine vessel study area, which extends approximately 50 nautical miles offshore from the coastline of California and Oregon between Port San Luis Harbor in the south to the mouth of the Columbia River in the north; and includes a 215-mile portion of the Columbia River extending east from the Pacific Ocean to the Port of Morrow in Boardman, Oregon. As listed in Table 3-1, the offshore projects

that would be completed at the same time as the Proposed Project and are considered for potential cumulative impacts related to marine transportation include:

- Vandenberg Offshore Wind Energy Projects (#18)
- Rincon Onshore and Offshore Facilities (#20)
- Chumash Heritage Marine Sanctuary Project (#21)
- Morro Bay Wind Energy Area (#22)
- Humboldt Wind Energy Area (#23)
- PacWave South Project (#24)

Two offshore projects, the South Ellwood Project (#19) and Port San Luis Breakwater Repair (#25), would be completed prior to the beginning of the Proposed Project's marine transportation needs (projected to begin in 2030) and would not result in long-term operational impacts that could overlap with the Proposed Project.

Cumulative Impact Analysis

Phase 1

Ground Transportation

Phase 1 of the Proposed Project would reduce the land use intensity of the DCPP site when compared to existing conditions and would result in less vehicle travel in the area due to the reduced number of employees commuting to the DCPP site from around the region on a daily basis. Therefore, the Proposed Project does not contribute to any cumulative impacts.

During Phase 1 of the Proposed Project there are three transportation infrastructure projects that are located on roadways that would be used by Proposed Project trucks. The Avila Beach Drive at Highway 101 Interchange (#3) includes construction of a roundabout on Avila Beach Drive at the intersection of Shell Beach Road and the US-101 ramps and includes traffic calming features. Trucks leaving the DCPP facilities would use these ramps to access US-101. The Proposed Project would not conflict with this proposed roundabout if it is designed to accommodate truck traffic. However, if truck activity during Phase 1 coincides with the construction of the roundabout, trucks may need to use an alternate route, such as San Luis Bay Drive, to reach US-101.

The Signal at Bello and Price Canyon Road (#7) includes a traffic signal at the intersection of Bello Street and Price Canyon Road in the City of Pismo Beach. Trucks accessing the PBR facilities would use this intersection. The Proposed Project would not conflict with this proposed traffic signal.

As part of the Highway 101 – Betteravia Road Interchange (#17), the US-101 ramps at Betteravia Road in the County of Santa Barbara are planned to be improved in FY 2031/32. Trucks traveling from the SMVR-SB facility would use this ramp to return to the DCPP. However, this construction activity would occur after Proposed Project Phase 1 truck activity in the area has been completed in 2029. If Proposed Project trucking activities and construction of the Betteravia ramps project were to coincide, the Proposed Project trucks could instead detour to the interchange at Stowell Road or further south to Santa Maria Way. Therefore, the Proposed Project would not conflict with this ramp improvement project.

Additionally, the Orano System ISFSI Modifications (#1), which would occur during Phase 1, would cause an additional 384 truck trips hauling construction materials and equipment to and from the DCPP site (Stantec, 2022). Although this is an increase in truck trips beyond the Proposed Project, the duration of this activity is less than a year during Phase 1. The additional truck activity associated with Phase 1 of the Proposed Project and the ISFSI modifications on a daily basis would not be enough to increase total VMT above the existing conditions threshold, and therefore would not create a cumulative impact related to Impact TRA-1. The increase of truck activity would remain subject to the TMP and related mitigations described under Impacts TRA-7 and TRA-8; although the volume of truck traffic would be increased, the truck activity would be a temporary condition and follow the same limited hours of operation outside of the peak travel periods and following the same truck routes along Avila Beach Drive directly to US-101 as the Proposed Project. The truck activity is not anticipated to alter roadway conditions in a way that would result in inadequate emergency access related to Impact TRA-3.

Marine Transportation

As shown in Table 3-1, the six proposed offshore projects considered for cumulative impacts related to marine transportation include five energy projects, which include plugging and abandoning wells and facilities (Rincon Onshore and Offshore Facilities, #20), designating an offshore wind energy area or constructing offshore wind facilities (Vandenberg Offshore Wind Energy Projects, #18; Morro Bay Wind Energy Area, #22; and Humboldt Wind Energy Area, #23), and constructing an ocean wave energy project (PacWave South Project, #24). The remaining offshore project is the Chumash Heritage Marine Sanctuary Project (#21), which includes designating a portion of the California Coast as a marine sanctuary. These projects would affect marine vessel traffic at the same time as the Proposed Project's marine transportation impacts, and therefore, are included in the cumulative analysis presented below for marine transportation.

The Chumash Heritage Marine Sanctuary Project (#21), designating a new marine sanctuary, would pose restrictions on marine traffic in the marine sanctuary area, which would be expected to have overall beneficial impacts on marine vessel safety. This project would not contribute to adverse cumulative impacts on marine vessel safety in combination with the Proposed Project. The remaining five projects would be constructed or in operation at the same time as Phase 1 and Phase 2 of the Proposed Project; therefore, these five projects (the Vandenberg Offshore Wind Energy Projects, #18; Rincon Onshore and Offshore Facilities, #20; Morro Bay Wind Energy Area, #22; Humboldt Wind Energy Area, #23; and PacWave South Project, #24) would contribute to cumulative impacts in combination with the Proposed Project. During the implementation of these projects, marine traffic would be generated from the deployment of vessels, equipment, and building materials for the construction, operation, or decommissioning of offshore energy facilities. However, these projects would be required to comply with applicable marine vessel safety regulations to minimize their contribution to cumulative impacts related to marine safety.

The Proposed Project would require up to 15 barge round trips to transport cofferdam gravel by during Period 1A, as well as three barge round trips to transport Discharge Structure void fill by barge and28 barge roundtrips to export waste during Period 1B (spans Phases 1 and 2). During the export of waste, two empty barges would also be staged at an offshore mooring in Avila Bay/Port San Luis and transported to the DCPP Intake Cove when sufficient waste containers are filled and ready for loading. The offshore marine traffic generated by the Proposed Project,

although occurring over several years, would be intermittent, temporary, and would cease with completion of decommissioning activities, which means that the Proposed Project would not make a lasting contribution to cumulative impacts associated with marine traffic. During decommissioning activities, the barge routes to Portland and Boardman, Oregon, and from the Port of Long Beach and Santa Catalina Island, would be 50 nautical miles from the coastline, which would minimize interference with other marine vessels. Barge operations are also required to comply with existing marine vessel safety regulations, including coordination with the US Coast Guard and avoiding or minimizing the crossing of traffic lanes. In addition, with implementation of MMs TRA-7 and TRA-8, which include coordinating with harbormasters at local ports and contracting with a marine surveyor to prepare safety assessments, barge transport associated with the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts related to marine vessel safety.

Phase 2

Ground Transportation

Phase 2 of the Proposed Project would further reduce the land use intensity of the DCPP site when compared to existing conditions and would result in less vehicle travel in the area. The potential overlap with roadway improvements noted in Phase 1 would be the same circumstances in Phase 2. Therefore, Phase 2 of the Proposed Project does not contribute to any cumulative impacts.

Marine Transportation

A portion of the barge trips to export waste from the DCPP site and import rock from Santa Catalina Island for filling the Discharge Structure void would likely extend into Phase 2. In addition, during the export of waste, two empty barges would also be staged at an offshore mooring in Avila Bay/Port San Luis and transported to the DCPP Intake Cove when sufficient waste containers are filled and ready for loading. Similar to Phase 1, to minimize interference with other marine vessels, the barge routes to Portland and Boardman, Oregon, and from Santa Catalina Island, would be 50 nautical miles from the coastline. Barge operations are also required to comply with existing marine vessel safety regulations, including coordination with the US Coast Guard and avoiding or minimizing the crossing of traffic lanes. In addition, with implementation of MMs TRA-7 and TRA-8, including, coordinating with the harbormasters at local ports and contracting with a marine surveyor to prepare safety assessments, barge transport associated with the Proposed Project would not result in a cumulatively considerable contribution to cumulative impacts related to marine vessel safety.

Post-Decommissioning Operations

Ground Transportation. The operations of the Marina could include up to 200 people daily accessing the Marina primarily by vehicle entering from Avila Beach Drive. These trips would not result in a cumulatively considerable increase in VMT related to the projects identified above and would overall remain less than the existing condition, and as they would include regular passenger vehicles and legal boat trailers. These trips would also not result in a cumulatively considerable contribution to impacts related to incompatible vehicles on public roads nor create conditions that would result in inadequate emergency access.

Marine Transportation. As stated previously, operations at the DCPP Intake Cove would be required to comply with applicable marine safety regulations. Therefore, these operations would not result in a cumulatively considerable contribution to cumulative impacts related to marine vessel safety.

4.16.6 Summary of Significance Findings

Table 4.16-4 presents a summary of the environmental impacts, significance determinations, and mitigation measures for the Proposed Project.

Table 4.16-4. Summary of Impacts and Mitigation Measures – Transportation

	Impact Significance Class				
	Phase 1		Phase 2	Post-Decom	
Impact Statement	***DCPP***	***PBR/SB***	***DCPP***	***Ops/ Marina***	**Mitigation Measures**
TRA-1: Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b) related to vehicle miles traveled (VMT); result in a net increase in VMT compared with the existing use	NI	NI/NI	NI	NI/NI	None required
TRA-2: Add traffic to a roadway that has design features that are incompatible with the type of Project vehicles that are to be used	II	II/II	II	NI/NI	**EM-2:** Project Plan, Updating, Tracking, and Reporting **TRA-1:** Truck Transportation Outside of Peak Hours
TRA-3: Alter roadway conditions, such as the closure of both lanes of traffic of a roadway that serves as the primary ingress and egress for an area, in a way that would result in inadequate emergency access	II	III/II	II	NI/III	**EM-2:** Project Plan, Updating, Tracking, and Reporting **TRA-2:** Specialty Heavy-Haul Transport Vehicle Transportation Management Plan **TRA-3:** Decommissioning Liaison **TRA-4:** Advance Notification of Decommissioning **TRA-5:** Quarterly Decommissioning Updates **TRA-6:** Diablo Creek Crossing Structure Inspection and Repair
TRA-4: Reduce the existing level of safety for marine vessels because of offshore barge transport and post-decommissioning operations at the improved DCPP Intake Cove	II	NI/NI	II	NI/III	**TRA-7:** Coordination with Harbormasters **TRA-8:** Marine Surveyor Assessment
Cumulative Impact	Not cumulatively considerable		Not cumulatively considerable		None required

Acronyms: PBR = Pismo Beach Railyard, SB = Betteravia Industrial Park (Santa Barbara County), Post-Decom = Post-Decommissioning, Ops = Long-Term Operations, Class I = Significant and Unavoidable, Class II = Less than Significant with Mitigation, Class III = Less than Significant, Class IV = Beneficial, NI = No Impact.