4.3 Biological Resources - Terrestrial

This section describes terrestrial species and habitats in the Project area (DCPP site, Pismo Beach Railyard [PBR], and Santa Maria Valley Railyard in Santa Barbara County [SMVR-SB]) that could be affected by decommissioning activities, identifies applicable significance thresholds, assesses the Proposed Project's impacts to terrestrial biological resources and their significance, and recommends measures to avoid or substantially reduce any effects found to be potentially significant. The environmental setting is primarily based on the *Diablo Canyon Decommissioning Terrestrial Biological Resources Assessment* (PG&E, 2020a), various biological surveys performed by Terra Verde at the Project sites between 2021 and 2022 (Pacific Gas & Electric [PG&E], 2021a; 2021b; 2022a; 2022b; 2022c; 2022d; 2022e), other technical studies prepared for PG&E by Terra Verde or others, and an independent literature review. This section also incorporates observations from field validations performed by Aspen Environmental Group (Aspen) and the results of coordination with the California Department of Fish and Wildlife (CDFW), United States Fish and Wildlife Service (USFWS), and National Marine Fisheries Service (NMFS).

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:

- Thoroughly analyze all terrestrial biological resources that are present on-site including species abundance, distribution, and status.
- Conduct botanical surveys during a year with average or above average precipitation and during the appropriate time, including ensuring that blooming plants are adequately surveyed.
- Conduct protocol surveys for sensitive and federally listed species as soon as possible and fully analyze potential effects of the Proposed Project on these species.
- Address all direct, indirect, and cumulative effects of the Proposed Project on biological resources.
- Identify specific and clearly defined mitigation measures for special-status species providing quantifiable and enforceable measures to reduce impacts to less-than-significant levels.

Agency Coordination and Consultation. The County of San Luis Obispo and Aspen conducted routine meetings with CDFW and USFWS to evaluate existing conditions and confirm survey requirements to support the CEQA evaluation of the DCPP Decommissioning Project. In addition, the County coordinated with the Nuclear Regulatory Commission (NRC) to discuss permitting and licensing requirements.

4.3.1 Environmental Setting

The climate along the Central Coast is typically characterized as Mediterranean with mild year-round temperatures averaging 80 degrees in the dry summer months and 60 degrees in the moist winter months. The coastal influence of the Pacific Ocean moderates temperatures in the summer and winter and provides moisture in the form of coastal fog. Rainfall is highly seasonal, with 80 percent of the average annual 17 inches of precipitation falling between December and April (San Luis Obispo, 2020).

Diablo Canyon Power Plant (DCPP). The DCPP site is located within the Irish Hills, which are part of the Santa Lucia Mountain Range, in unincorporated San Luis Obispo County. The DCPP site is approximately 7 miles northwest of Avila Beach, with the Pacific Ocean to the west and southwest and Montaña de Oro State Park directly north. The DCPP site, which is based on the boundary of the facility's Federal Part 50 License, is comprised of 750 acres; approximately 610 acres are located within the Coastal Zone and 140 acres extend inland, outside of the Coastal Zone. The coastal border of the site is defined by rocky bluffs with gently to moderately sloping terraces ranging from 70 to 100 feet above sea level. Developed and ruderal areas are primarily concentrated on a flat and expansive lower terrace, with structures scattered across the landscape. Diablo Creek flows southwest from the Irish Hills and along the northern edge of the developed areas of the DCPP site. This feature was considerably modified from its natural condition during construction of the DCPP facility, with approximately 0.5-mile of the creek culverted or filled. Several additional unnamed drainages, most of which are fed by artesian springs, also occur on the site. The site is surrounded by approximately 12,000 acres of open space lands that are owned by either PG&E or Eureka Energy. The surrounding non-developed open space supports intact natural habitats comprised of rolling coastal hills and bluffs in a mosaic of grazed annual grasslands, coast live oak woodlands, riparian woodlands, chaparral, and various scrub habitats.

Pismo Beach Railyard (PBR). The PBR site consists of approximately 25.5 acres and is located along Price Canyon Road in the City of Pismo Beach. The southwestern corner of the site occurs within the Coastal Zone. The majority of the PBR site is developed, including roadways, paved parking areas, and buildings. The site slopes west to east and drains into a man-made canal along the eastern boundary, then draining into the Pismo Creek channel located approximately 250 feet to the east. Pismo Creek supports intact riparian vegetation and flows directly to the traditionally navigable waters of the Pacific Ocean less than 1 mile south of the site. Adjacent open space areas are characterized by non-native grasslands, roadside ruderal areas, riparian habitat, and coast live oak woodlands.

Santa Maria Valley Railyard (SMVR-SB). The SMVR-SB site consists of approximately 28.4 acres located roughly 1.6 miles west of the City of Santa Maria and approximately 3.2 miles southeast of the City of Guadalupe in Santa Barbara County. The eastern portion of the site is developed, consisting of infrastructure associated with an historic sugar refinery while the western portion consists of an existing railroad track with a series of spur lines bordered by a dense eucalyptus grove. Guadalupe Lake is located approximately 350 feet to the south.

Methodologies

To support this evaluation, data regarding terrestrial biological resources was obtained through literature review and field surveys, as described below. The data collection focused on resources that have the potential to occur on the Project sites.

Literature Review. Special-status biological resources known to, or with the potential to, occur in the Project area were identified through a review of existing literature sources including US Geological Survey (USGS) topographic maps, aerial photography, and the CDFW California Natural Diversity Database (CNDDB) (CDFW, 2022a). A 10-mile buffer was used for each site to gather data on potential biological resources, which encompassed either the entirety or portions of the following USGS 7.5-minute topographic quadrangles:

- Arroyo Grande NE
- Casmalia
- Guadalupe
- Lopez Mtn.
- Morro Bay South
- Nipomo
- Oceano
- Orcutt
- Pismo Beach
- Port San Luis
- Point Sal
- San Luis Obispo
- Santa Maria
- Sisquoc
- Tar Spring Ridge
- Twitchell Dam

Additional data regarding the potential occurrence of sensitive biological resources were gathered from several additional sources including:

- Various biological resource databases and lists, including USFWS Information for Planning and Conservation Program (IPaC); CDFW Special Plants and Animals Lists; California Native Plant Society (CNPS) Inventory of Rare and Endangered Vascular Plants of California; Consortium of California Herbaria (CCH) San Luis Obispo County records; eBird online records for the Proposed Project area including a 10-mile buffer; and, iNaturalist online records for the Project area including a 10-mile buffer (USFWS, 2022; CDFW, 2022b; CNPS, 2022; CCH, 2022; eBird, 2022; iNaturalist, 2022).
- Various biological resource reports prepared for the Proposed Project, including Biological Resource Assessments and Addenda for the DCPP, PBR, and SMVR-SB sites; Site Assessment and Survey Reports for California Red-Legged Frog (*Rana draytonii*) and California Tiger Salamander (*Ambystoma californiense*); and a Preliminary Oak Tree Inventory and Mitigation Plan (PG&E, 2020a; 2021a; 2021b; 2022a; 2022b; 2022c; 2022d; 2022e).
- Previous biological resource reports completed for projects within the vicinity of the Project area (PG&E, 2016a; 2016b).

Field Surveys. Terra Verde conducted biological resource assessments within and adjacent to the Proposed Project area sites in 2020, 2021, and 2022 (PG&E, 2020a; 2021a; 2021b; 2022a; 2022b; 2022c; 2022d; 2022e). In addition, Aspen conducted site visits in 2021 and 2022 to confirm the vegetation mapping and survey results as they related to current baseline conditions in the Project area, and to perform an assessment of potential wetlands and other jurisdictional features at the DCPP site. Table 4.3-1 summarizes the field surveys conducted to date for the Proposed Project.

Table 4.3-1. Summary of Field Surveys

Survey Focus	Date(s)	Location	Number of Personnel
California red-legged frog habitat assessment	March 2, 2020	DCPP, Tom's Pond[1]	2
California red-legged frog habitat assessment	March 5, 2020	PBR	3
Supplemental Diablo Creek steelhead survey and habitat assessment	April 29, 2020	DCPP (upper Diablo Creek)	3
Protocol-level California red-legged frog daytime survey	April 28, May 19, July 8, 2020	PBR	2
Protocol-level California red-legged frog nighttime survey	May 12, June 2, June 9, June 24, July 22, 2020	PBR	2
Protocol-level California red-legged frog survey[2]	April 29, 2020	DCPP	3
Botanical survey and habitat assessment	May 5, 2020	DCPP	1
Supplemental Diablo Creek steelhead survey and habitat assessment	May 6, 2020	DCPP (lower Diablo Creek)	1
Botanical and wildlife survey, habitat assessment, preliminary jurisdictional analysis	May 6-8, 11, 13, and June 17, 2020	DCPP	2
Botanical and wildlife survey, habitat assessment, preliminary jurisdictional analysis	May 19, 2020	PBR	2
Wetland delineation	June 30, 2020	PBR	2
Focused botanical survey[3]	July 13, 2020	DCPP	1
Reconnaissance-level biological resources assessment	April 13 and June 14, 2021	SMVR-SB	2
Preliminary oak tree inventory	June 15, 2021	DCPP	2
California tiger salamander site assessment	December 28, 2021	SMVR-SB	1
California red-legged frog daytime survey	April 21, 2022	DCPP (Diablo Creek), Tom's Pond	3
Spring botanical survey[3]	April 22 and May 23, 2022	DCPP	3
Spring botanical survey	April 28, 2022	SMVR-SB	2
California red-legged frog nighttime survey	April 29, May 5 and 16, 2022	DCPP (Diablo Creek), Tom's Pond	4
California red-legged frog daytime survey	May 27 and June 6, 2022	Tom's Pond	3
California tiger salamander site assessment	June 6, 2022	Tom's Pond	1

Table 4.3-1. Summary of Field Surveys

Survey Focus	Date(s)	Location	Number of Personnel
Aquatic assessment for wetlands and other jurisdictional features[4]	July 11, 2022	DCPP	2

Source: PG&E, 2020a, 2021a, 2022a, 2022b, 2022c, 2022d, 2022e.
[1] Tom's Pond is a perennial water feature approximately 1.5 miles north of the DCPP site (see Figure 4.3-7).
[2] Survey effort was terminated once the species was confirmed present on April 29, 2022.
[3] Survey focused on six plant species requested for reevaluation by the County and other agencies (PG&E, 2022a).
[4] All field analyses conducted by PG&E, with the exception of the July 2022 aquatic assessment performed by Aspen Environmental Group.

Terrestrial Vegetation Communities and Land Cover Types

Vegetation cover is determined by biotic and abiotic factors including elevation, aspect, proximity to water, and landforms or soil type. In the Project area, vegetation primarily consists of common plant species and vegetation characteristic of the coastal ranges and valleys of the Central Coast. Despite a history of past disturbance from development, cattle grazing, and other activities, the Project area supports a variety of native and non-native vegetation communities. Terrestrial vegetation communities and other land cover types throughout the Project area were mapped and described by Terra Verde (PG&E, 2020a, 2021a). The associated acreages identified in the Project area are summarized in Table 4.3-2 and shown in Figures 4.3-1 to 4.3-3.

Table 4.3-2. Terrestrial Vegetation and Land Cover Types and Acres Present in the Project Area

Vegetation and Land Cover Type	DCPP	PBR	SMVR-SB	*Total Acres*
Coastal, Riparian, and Wetland Communities				
Arroyo Willow Thickets**	6.12	0.37	--	*6.49*
Hardstem and California Bulrush Marshes**	0.06	0.19	--	*0.25*
Cattail Marshes**	--	0.06	--	*0.06*
Artesian Springs / Freshwater Wetlands**	1.00	--	--	*1.00*
Upland Communities				
Wild Oats and Annual Brome Grasslands	331.01	1.00	--	*332.01*
Needlegrass – Melic Grass Grassland	3.74	--	--	*3.74*
Coyote Brush Scrub**	37.37	0.12	1.75	*39.24*
Coastal Bluff Scrub*/**	6.70	--	--	*6.70*
California Sagebrush Scrub**	101.57	--	--	*101.57*
California Coffeeberry Scrub*	1.54	--	--	*1.54*
Bush Monkeyflower Scrub*	18.93	--	--	*18.93*
Chamise – Black Sage Chaparral	2.63	--	--	*2.63*
Buck Brush Chaparral	16.93	--	--	*16.93*
Toyon Chaparral	10.25	--	--	*10.25*

Table 4.3-2. Terrestrial Vegetation and Land Cover Types and Acres Present in the Project Area

Vegetation and Land Cover Type	DCPP	PBR	SMVR-SB	*Total Acres*
Coast Live Oak Woodland and Forest**	24.48	5.45	--	*29.93*
Ice Plant Mats	--	2.53	--	*2.53*
Eucalyptus Grove	--	--	6.81	*6.81*
Other Land Cover Types				
Ruderal / Disturbed	4.12	3.67	6.20	*13.99*
Developed	142.86[1]	15.17	13.59	*171.62*
Total	**709.31[2]**	**28.56**	**28.35**	***766.22***

Source: PG&E, 2020a; 2021a

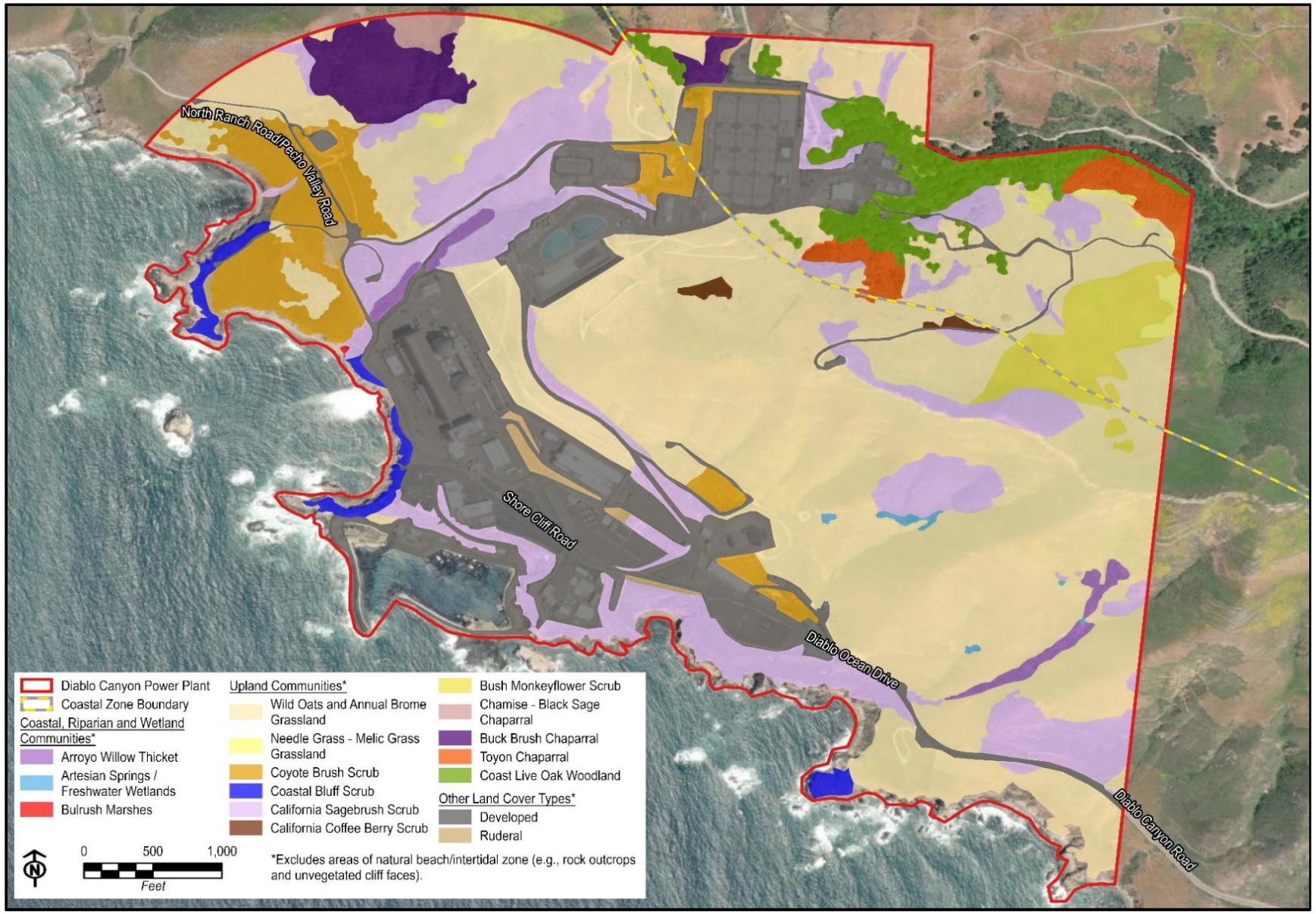
[1] Acreage of developed area does not include the Vertical Cask Transporter Warehouse area (see Figure 2-2).

[2] Acreage total includes terrestrial vegetation communities and other land cover types and excludes areas of natural beach/intertidal zone (e.g., Intake Cove, rocky outcrops, unvegetated cliff faces) within the approximately 750-acre DCPP boundary.

* Designated as a CDFW Sensitive Natural Community

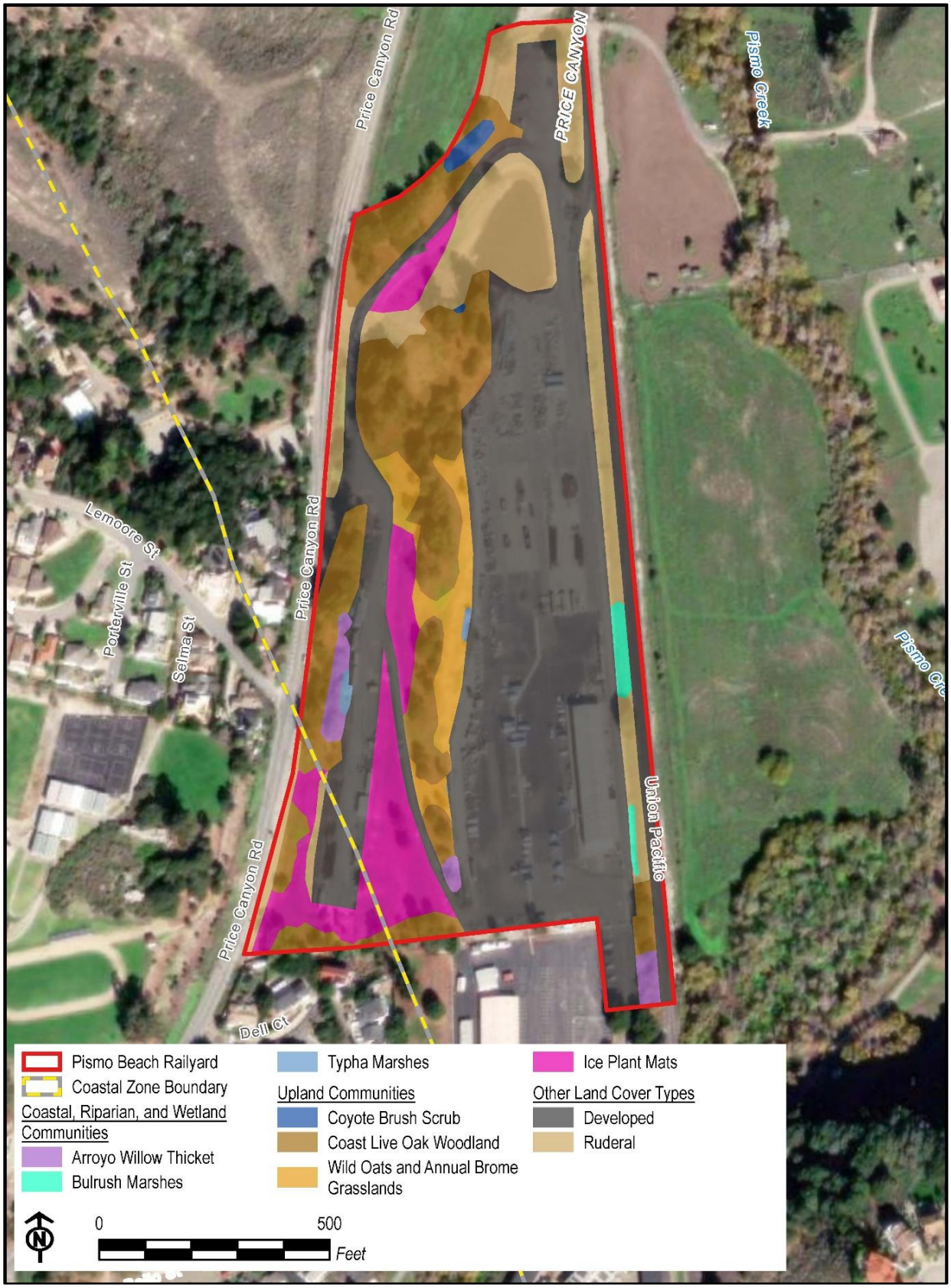
** Community or portion of community identified as an Environmentally Sensitive Habitat Area (ESHA) pursuant to Section 30107.5 of the Coastal Act and Section 23.07.170 of the San Luis Obispo County Code

Figure 4.3-1. DCPP Vegetation and Cover Types



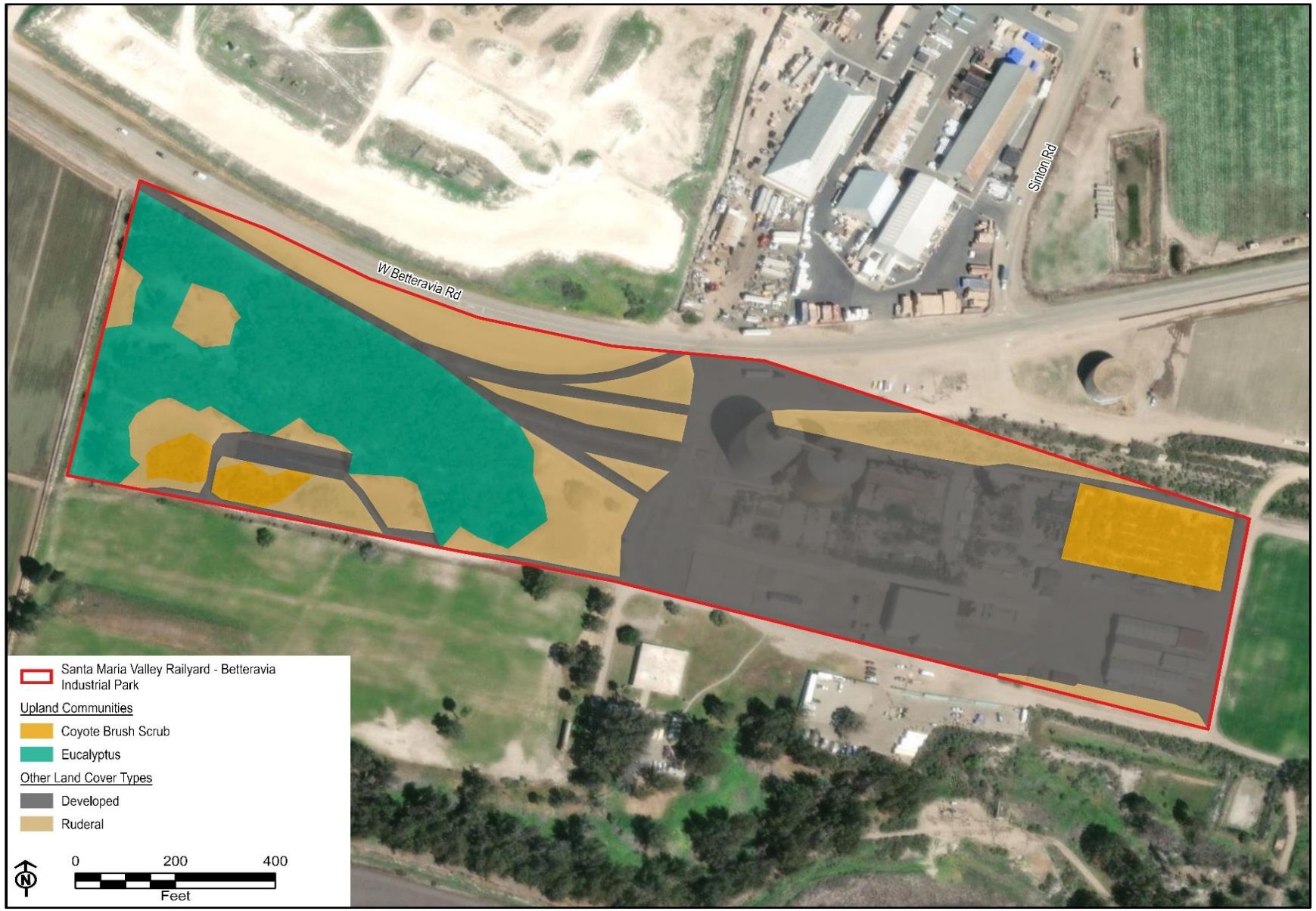
Source: Esri, 2022; Terra Verde Environmental Consulting, LLC (Terra Verde), 2022.

Figure 4.3-2. PBR Vegetation and Cover Types



Source: Esri, 2022; PG&E, 2021c.

Figure 4.3-3. SMVR-SB Vegetation and Cover Types



Source: Esri, 2022; PG&E, 2021c.

Coastal, Riparian, and Wetland Vegetation Communities

Riparian habitats are biologically diverse and are the exclusive habitat for many wildlife species. Many of these species are wholly dependent on riparian habitats throughout their life cycles, while others may utilize these habitats during certain seasons or life history phases. These habitats provide food and shelter resources for fish and other aquatic species while also providing the structural complexity required for nesting and foraging for a variety of species. Riparian communities support a broader diversity of wildlife due to higher biological productivity, denning site availability, thermal cover, and greater access to water.

Primary productivity in riparian habitats is high due to year-round soil moisture. High plant productivity leads to increased habitat structural diversity and increased food availability for herbivorous animals, and in turn, predatory animals. Insect productivity is also exhibited at relatively higher levels in riparian systems. During warmer months, large numbers of insects provide a prey base for diverse fauna. Structural diversity is also much more evident in riparian systems than those of most regional uplands. Riparian woodlands tend to have multilayered herb, shrub, and tree canopies, whereas most upland communities are of a relatively simple structure.

Much of the natural riparian vegetation in California has been lost or degraded due to a variety of factors, including land use conversions to agricultural, urban, and recreational uses; channelization for flood control; sand and gravel mining; groundwater pumping; water impoundments; and various other alterations.

Riparian and wetland vegetation communities are limited to a total of approximately 7.8 acres in the Project area and are comprised of arroyo willow (*Salix lasiolepis*) thickets, marshes, and artesian springs/freshwater wetlands at the DCPP and PBR sites.

Arroyo Willow Thickets (*Salix lasiolepis* Shrubland Alliance). Arroyo willow thickets comprise a total of 6.5 acres and are present at the DCPP and PBR sites where they are associated with drainages or isolated wetland features.

At the DCPP site, arroyo willow thickets occur along the lower reaches of Diablo Creek in the northwest portion of the site and an unnamed drainage in the southeast portion of the site. These thickets are dominated by an overstory of arroyo willow that forms an intermittent to continuous riparian canopy. The multi-layered understory at Diablo Creek consists of blue elderberry (*Sambucus nigra* ssp. *caerulea*), American dogwood (*Cornus sericea* ssp. *sericea*), western poison oak (*Toxicodendron diversilobum*), California coffee berry (*Frangula californica*), and California blackberry (*Rubus ursinus*). Emergent herbaceous vegetation is dominated by western water hemlock (*Cicuta douglasii*) and giant horsetail (*Equisetum telmateia* ssp. *braunii*). At the unnamed drainage, which has been heavily impacted by cattle use, sagebrush scrub borders and mixes with the willow canopy and is dominated by California sagebrush (*Artemisia californica*), coyote brush (*Baccharis pilularis*), and California coffee berry. The stream channel along this drainage occasionally flattens, forming wide, flooded areas with emergent herbaceous vegetation that includes cattails (*Typha* sp.), low bulrush (*Isolepis cernua*), watercress (*Nasturtium officinale*), cutleaf water parsnip (*Berula erecta*), maritime plantain (*Plantago maritima*), and seaside brookweed (*Samolus parviflorus*).

At the PBR site, arroyo willow thickets are limited to two remnant patches associated with isolated wetland features that are fed by off-site artesian springs. The shrub layer within these patches is continuous while the understory is intermittent to continuous, with slender willow herb at low cover. This community is also associated with a cattail wetland located along the western boundary of the railyard.

This community most closely corresponds with *Salix lasiolepis* Shrubland Alliance (arroyo willow thickets) in a *Manual of California Vegetation* (MCV) (Sawyer et al., 2009). Because this community is dominated by hydrophytic species, it is considered a coastal wetland and meets the definition of Environmentally Sensitive Habitat Area (ESHA) wherever it occurs within the Coastal Zone. Arroyo willow thickets provide valuable and often essential habitat for nesting birds, reptiles, small mammals, and other wildlife.

Hardstem and California Bulrush Marshes (*Schoenoplectus* (*acutus, californicus*) Herbaceous Alliance). Hardstem and California bulrush marshes comprise approximately 0.25 acre and are found at the DCPP and PBR sites. At the DCPP site, this community occurs as a small patch of marsh habitat along the mouth of Diablo Creek, immediately upstream of the confluence with the Pacific Ocean. Due to the steep conditions just below the mouth of Diablo Creek, it is assumed that this area rarely receives tidal influence and therefore supports mostly freshwater habitat. This habitat is dominated by bulrush (*Schoenoplectus* spp.) with cattail, horsetail (*Equisetum* sp.), watercress (*Nasturtium officinale*), and salt grass (*Distichlis spicata*) present at low cover at the DCPP site. It is also present at the PBR site where it occurs within the channel of an unnamed drainage bordering the eastern edge of the site. This habitat is dominated by rabbitfoot grass (*Polypogon monspeliensis*) and ditch beard grass (*P. interruptus*) present along the margins and understory at the PBR site.

This community most closely corresponds with *Schoenoplectus* (*acutus, californicus*) Herbaceous Alliance (hardstem and California bulrush marshes) in the MCV classification system and is considered a CDFW sensitive natural community. It also meets the definition of ESHA as a coastal wetland. Hardstem and bulrush marshes provide valuable habitat for nesting birds, reptiles, small mammals, and other common and special-status wildlife species.

Cattail Marshes (*Typha* [*angustifolia, domingensis, latifolia*] Herbaceous Alliance). Cattail marshes comprise approximately 0.06 acre and occur in association with three isolated wetlands at the PBR site. These features are fed by offsite artesian springs that provide perennial water and support emergent herbaceous wetland vegetation dominated by broad-leaved cattail (*Typha latifolia*). The westernmost of these wetlands supports an overstory of arroyo willow and an herbaceous layer co-dominated by low-growing bulrush and hornwort (*Ceratophyllum demersum*), with mountain bog bulrush (*Scirpus microcarpus*) and slender willow herb (*Epilobium ciliatum*) also present.

This community most closely corresponds with *Typha* (*angustifolia, domingensis, latifolia*) Herbaceous Alliance (cattail marshes) in the MCV classification system. It is also considered a coastal wetland and meets the definition of an ESHA where it occurs within the Coastal Zone at the PBR site.

Artesian Springs / Freshwater Wetlands. Nine artesian springs and associated freshwater perennial wetlands were identified at the DCPP site during 2020 surveys (PG&E, 2020a). Eight of the springs are located along the south-facing ridgeline that rises steeply above the coastal terrace in the southern portion of the site while one occurs at the headwaters of an unnamed drainage on the opposite side of the same ridgeline. Most of the springs flow directly into intermittent drainages identified on the site and two are isolated, forming small patches of wetland habitat on steep side slopes. Each of these locations support perennial wetland vegetation communities that are unique and distinct from the adjacent habitats.

The majority of these areas support dense arroyo willow thickets, with California coffee berry and western poison oak (*Toxicodendron diversilobum*) co-dominant in the shrub layer while others flow from rocky escarpments that primarily support mostly herbaceous vegetation, including cutleaf water parsnip (*Berula erecta*), tall flatsedge (*Cyperus eragrostis*), maritime plantain (*Plantago maritima*), seaside brookweed (*Samolus parviflorus*), watercress (*Nasturtium* sp.), low bulrush (*Scirpus cernuus*), and southern goldenrod (*Solidago confinis*).

The shrub-dominated habitats associated with some of these springs most closely correspond with the arroyo willow thickets community described above. The wetland habitat associated with some of these springs do not correspond to any habitats described in the MCV classification system; however, because these areas are dominated by hydrophytic species, they are considered coastal wetlands and also meet the definition of ESHA. Although all of the springs and associated drainages at the DCPP site have been subject to impacts from cattle grazing, these unique habitats provide perennial water and highly valuable habitat for various common and special-status wildlife species.

Upland Vegetation Communities

Upland communities comprise approximately 576 acres and characterize the majority of vegetation types in the Project area. They occur within all sites. In contrast to riparian and wetland plant species that are adapted to seasonally flooded or periodically saturated soils, upland plant communities consist of plant species that are adapted to drier conditions and typically require only seasonal precipitation to obtain adequate water resources for growth and reproduction. Away from these water sources and onto adjacent slopes at the DCPP and PBR sites, the vegetation transitions to upland vegetation dominated by various shrublands and grasslands.

Wild Oats and Annual Brome Grassland (*Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance). This non-native annual grassland community comprises approximately 332 acres and is present at the DCPP and PBR sites. It is the most widely occurring community at the DCPP site where it forms an intermittent to continuous cover on the steep rocky slopes and coastal terraces. Locally dominant species vary throughout the site include wild oat (*Avena fatua*), slender wild oat (*A. barbata*), ripgut grass (*Bromus diandrus*), false brome (*Brachypodium distachyon*), rye grass (*Festuca perennis*), and wall barley (*Hordeum murinum*). Non-native, invasive species, such as Italian thistle (*Carduus pycnocephalus*), Russian thistle (*Salsola tragus*), and black mustard (*Brassica nigra*), have established in much of these grasslands, occasionally becoming dominant.

At the PBR site, this community primarily occurs within remnant woodland and scrub habitats where it is dominated by ripgut grass with patches of rattail sixweeks grass (*Festuca myuros*), red brome (*B. rubens*), purple needle grass (*Stipa pulchra*), and wall barley commonly occurring.

This community most closely corresponds with *Avena* spp. – *Bromus* spp. Herbaceous Semi-Natural Alliance (wild oats and annual brome grasslands) in the MCV classification system (Sawyer et al., 2009). Although this community may provide some habitat for nesting birds, small mammals, and other wildlife, the ruderal nature and high degree of infestation by non-native vegetation limits habitat suitability for most common and special-status wildlife species.

Needlegrass – Melic Grass Grassland (*Nassella* (=*Stipa*) spp. – *Melica* spp. Herbaceous Alliance). Needlegrass – melic grass grassland comprises approximately 3.7 acres at the DCPP site where it is limited to fragmented patches within openings and along edges of various shrubland habitats in the northeast portion of the site. It is characterized by a 20 to 60 percent herbaceous layer cover of purple needle grass with non-native grasses comprising the remainder of the cover. Little California melic (*Melica imperfecta*) also occurs in some patches. The locations where this community is present are somewhat protected from cattle grazing due to surrounding shrub habitats that limit access.

This community most closely corresponds with *Nassella* [=*Stipa*] spp. – *Melica* spp. Herbaceous Alliance (needle grass – melic grass grassland) in the MCV classification system (Sawyer et al., 2009). It may provide valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

Coyote Brush Scrub (*Baccharis pilularis* Shrubland Alliance). Coyote brush scrub comprises approximately 39.2 acres collectively at the DCPP, PBR, and SMVR-SB sites. This community dominates the coastal terrace in the northern portion of the DCPP site where a continuous shrub canopy ranging from nearly monotypic stands of coyote brush to highly diverse shrubland associations is established along the immediate bluff edge. Other shrubs are present at variable cover including California sagebrush, California coffee berry, black sage (*Salvia mellifera*), and western poison oak. Highly disturbed patches of coyote brush also occur along the margins of roads and developed portions of the DCPP site where weed abatement and vegetation management activities are routinely conducted. These patches also support a composition of ruderal vegetation, including fennel (*Foeniculum vulgare*), tocalote (*Centaurea melitensis*), jubata grass (*Cortaderia jubata*), and various non-native grasses. Hoffman's sanicle (*Sanicula hoffmannii*), designated as a CRPR 4.3 species, was observed along a maintained path within this habitat just north of Diablo Creek (PG&E, 2022a). Additionally, this community supports a few individuals of San Diego viguiera (*Bahiopsis laciniata*), designated as a CNPS California Rare Plant Rank (CRPR) 4.3 species, along the northern portion of the coastal terrace of the DCPP site (PG&E, 2020a). However, the typical range for this species is limited to Ventura County south into the San Diego/Baja region. Given the current range limits for this species, it is unlikely that this is a natural occurrence.

Coyote brush scrub forms an open shrub habitat in scattered patches along the western and northern edges of the PBR site and along the southwest and northeast corners of the SMVR-SB site. At the PBR site, coyote brush is dominant, with California coffee berry and toyon (*Heteromeles arbutifolia*) present at lower cover densities. Ornamental species, including acacia (*Acacia*

sp.), pine (*Pinus* sp.), and gum (*Eucalyptus* spp.) also occur. Additionally, a small population of black-flowered figwort (*Scrophularia atrata*), a CRPR 1B.2 species, was documented within this community along the northern edge of the PBR site during 2020 surveys (PG&E, 2020a).

This community most closely corresponds with *Baccharis pilularis* Shrubland Alliance (coyote brush scrub) in the MCV classification system (Sawyer et al., 2009). It provides suitable habitat for nesting birds, reptiles, small mammals, and other wildlife.

Coastal Bluff Scrub (*Baccharis pilularis / Dudleya farinosa* Association). Coastal bluff scrub comprises approximately 6.7 acres along the coastal terrace bordering the immediate bluff edge at the DCPP site. It is concentrated on the rocky, exposed bluffs that jut out into the ocean and around the edge of the developed portion of the terrace. The short-statured shrub layer forms an intermittent to continuous canopy that is characteristically wind-pruned due to prevailing onshore, salt-laden winds. Woolly seaside sunflower (*Eriophyllum staechadifolium*) and coastal goldenbush (*Isocoma menziesii*) form the dominant shrub cover in most areas with coyote brush common at variable cover. The canopy is interspersed with an herbaceous layer of annual and perennial herbs that compose a nearly continuous cover dominated by seaside daisy (*Erigeron glaucus*) and a mixed population of dudleya including sand lettuce (*Dudleya caespitosa*), Palmer's dudleya (*D. palmeri*), and lance-leaved dudleya (*D. lanceolata*). Robust populations of Nuttall's milk-vetch (*Astragalus nuttallii*) are also present along the coastal bluff edge, often in areas that were inaccessible during surveys due to the proximity to the cliff edge (PG&E, 2020a). Due to nearby occurrences in similar habitat just north of the site, it is assumed that *Astragalus nuttallii* var. *nuttallii*, a CRPR 4.2 species, is present within integrated populations of the more common *A. n.* var. *virgatus*. Beach saltbush (*Atriplex leucophylla*) is also characteristically present in occasionally dense patches and annual grasses are common throughout the community.

This association does not correspond to any within the MCV classification system. Therefore, it should be treated as *Baccharis pilularis/Dudleya farinosa* Provisional Shrubland Association of the *Baccharis pilularis* Shrubland Alliance (coyote brush scrub) in the MCV classification system. Because it is considered a Provisional Shrubland Association, it would be defined as a Sensitive Vegetation Community by CDFW. Since this community occurs entirely within the Coastal Zone and supports a special-status botanical species, it meets the definition of an ESHA. Coastal bluff scrub provides valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

California Sagebrush Scrub (*Artemisia californica* Shrubland Alliance). California sagebrush scrub comprises approximately 101 acres and occurs along the coastal terrace in the southern portion of the DCPP site. It is also present on scattered slopes and within canyons throughout the site. It is characterized by a dominant or co-dominant shrub cover of California sagebrush. Coyote brush, California coffee berry, western poison oak, black sage, and bush monkeyflower (*Diplacus aurantiacus*) also occur and range in cover from uncommon in a stand to co-dominant. Rocky outcrops are common within this and adjacent habitats, particularly on the steep slopes overlooking the coastal terrace. The herbaceous understory is variable, from sparse cover composed of annual grasses to nearly continuous cover of annual and perennial grasses and forbs, including purple needle grass and little California melic. Hoffman's sanicle (*Sanicula hoffmannii*), designated as a CRPR 4.3 species, was found abundantly in some stands of this community (PG&E, 2020a).

This community most closely corresponds with *Artemisia californica* Shrubland Alliance (California sagebrush scrub) in the MCV classification system. Additionally, stands of this community that support Hoffman's sanicle within the Coastal Zone meet the definition of ESHA. It provides valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

California Coffeeberry Scrub (*Frangula californica* Shrubland Association). California coffeeberry scrub comprises approximately 1.5 acres and is limited to small patches on slopes above the developed portions of the DCPP site. It is dominated by California coffeeberry with coyote brush and western poison oak characteristically present. The understory is sparse, comprised mostly of annual grasses and thistles from adjacent and disturbed grasslands.

This association does not correspond to any descriptions within the MCV classification system. Therefore, it should be treated as *Frangula californica* ssp. *Californica* Provisional Shrubland Association within the *Frangula californica – Rhododendron occidentale – Salix breweri* Shrubland Alliance in the MCV classification system. Because it is considered a Provisional Association, it would be defined as a Sensitive Vegetation Community by CDFW. It provides valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

Bush Monkeyflower Scrub (*Diplacus aurantiacus* Shrubland Alliance). Bush monkeyflower scrub comprises approximately 18.9 acres and occurs in wide swaths at the edges of adjacent shrubland communities on the north-facing slopes above upper Diablo Creek at the DCPP site. It is an early successional habitat, regenerating from past vegetation clearing practices. Patches of this community are at different stages of regeneration, based on variable disturbance history. The younger stands form an intermittent shrub canopy dominated entirely by bush monkeyflower with annual grasses and forbs composing the herbaceous layer. The understory is irregular, occasionally with a co-dominant cover of wood fern (*Dryopteris arguta*) and western poison oak. In some areas, a robust understory is regenerating and is composed of southern hedge nettle (*Stachys bullata*), California man-root (*Marah fabacea*), Italian thistle (*Carduus pycnocephalus*), purple needle grass, and little California melic. More mature stands onsite intergrade with California sagebrush, forming a mixed and well-developed shrub canopy. Hoffman's sanicle, designated as a CRPR 4.3 species, was also identified in association with this community (PG&E, 2020a).

This community most closely corresponds with *Diplacus aurantiacus* Shrubland Alliance (bush monkeyflower scrub) in the MCV classification system and is classified as a Sensitive Vegetation Community by CDFW. It may provide valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

Chamise – Black Sage Chaparral (*Adenostoma fasciculatum – Salvia mellifera* Shrubland Alliance). This mature chaparral community is limited to approximately 2.6 acres along an east-facing slope in the northwest corner of the DCPP site where it is provided moderate protection from prevailing onshore winds. It is characterized by a mostly continuous shrub canopy consisting of co-dominant chamise (*Adenostoma fasciculatum*) and black sage. Rocky outcrops are common throughout this community, forming sparsely vegetated openings in the shrub cover that also includes California buckwheat (*Eriogonum fasciculatum*), buck brush (*Ceanothus cuneatus* var. *ramulosus*), and California sagebrush. The understory is sparse to absent.

This community most closely corresponds with *Adenostoma fasciculatum – Salvia mellifera* Shrubland Alliance in the MCV classification system. It provides valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

Buck Brush Chaparral (*Ceanothus cuneatus* Shrubland Alliance). Buck brush chaparral comprises approximately 16.9 acres and occurs on the steep slopes and ridgelines along the northern edge of the DCPP site where it is exposed to prevailing onshore winds. Shrubs along the ridgeline are characteristically stunted to a height of less than two feet. Buck brush and black sage are co-dominant and generally form a continuous shrub cover canopy with California sagebrush and spiny redberry (*Rhamnus crocea*) present at low densities. The understory is sparse to absent.

This community most closely corresponds with *Ceanothus cuneatus* Shrubland Alliance (buck brush chaparral) in the MCV classification system. It provides valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

Toyon Chaparral (H*eteromeles arbutifolia* Shrubland Association. Toyon chaparral comprises approximately 10.3 acres and occurs along the mostly north-facing slope above upper Diablo Creek at the DCPP site. It is composed of a continuous shrub canopy dominated by toyon (*Heteromeles arbutifolia*) with a robust understory largely dominated by western poison oak. Emergent trees are characteristically present and include California bay (*Umbellularia californica*) and coast live oak (*Quercus agrifolia*). Toyon chaparral forms transitional habitats with other shrublands and coast live oak woodlands, often resulting in a variable mixed shrub canopy that includes California coffee berry, coyote brush, and California sagebrush.

This community most closely corresponds with *Heteromeles arbutifolia* Shrubland Association (toyon chaparral) of the *Prunus ilicifolia-Heteromeles arbutifolia-Ceanothus spinosus* Shrubland Alliance in the MCV classification system. It provides valuable habitat for nesting birds, reptiles, small mammals, and other wildlife.

Coast Live Oak Woodland and Forest (*Quercus agrifolia* Forest and Woodland Alliance). Coast live oak woodland and forest comprises approximately 29.9 acres and is present in the upper reaches of Diablo Creek and along a small tributary located north of the switchyard at the DCPP site. Remnant patches of coast live oak woodland also occur in disjunct patches in the western and northern portions of the PBR site.

The location above Diablo Creek intergrades with a wide swath of relatively undisturbed riparian woodland dominated by coast live oak with California bay and big-leaf maple (*Acer macrophyllum*) also occurring. The understory is open with intermittent to occasionally continuous cover dominated by western poison oak and California coffee berry. Herbaceous vegetation along the edges and bottom of the creek is occasionally dense, dominated by western water hemlock, watercress, giant horsetail, and hoary nettle (*Urtica dioica* spp. *Holosericea*). The canopy associated with the small tributary to Diablo Creek is dominated by coast live oak with occasional California bay. The understory at this location is open with intermittent cover of western poison oak. Additionally, Hoffman's sanicle, designated as a CRPR 4.3 species, was documented throughout the understory along the small tributary drainage (PG&E, 2020a).

Remnant coast live oak woodlands at the PBR site are generally disturbed, forming an intermittent to continuous tree canopy dominated by coast live oak. The shrub layer is composed of

intermittent occurrences of toyon and California coffee berry while the understory consists of sparse annual grasses. Much of this community is bordered and partially invaded by ornamental species, including acacia, pine, Monterey cypress (*Hesperocyparis macrocarpa*), and gum (*Eucalyptus* spp.) trees at the site.

This community most closely corresponds with *Quercus agrifolia* Forest and Woodland Alliance (coast live oak woodland and forest) in the MCV classification system. Individual coast live oak trees and coast live oak woodlands are regulated under California Public Resource Code 21083.4, the County Inland Land Use Ordinance (Title 22, Section 22.52.100), and the County Coastal Zone Land Use Ordinance (Title 23, Section 23.05.062). This community provides valuable habitat for nesting birds, reptiles, mammals, and other wildlife.

Ice Plant Mats (*Mesembryanthemum* spp. – *Carpobrotus* spp. Herbaceous Semi-Natural Alliance). Ice plant mats comprise approximately 2.5 acres and form dense, monotypic surface cover at the edges of developed portions of the PBR site. This community is dominated by sea fig (*Carpobrotus chilensis*) and freeway ice plant (*C. edulis*) with occasional annual grasses and emergent shrubs, including coyote brush and California coffee berry.

This community most closely corresponds with *Mesembryanthemum* spp. – *Carpobrotus* spp. Herbaceous Semi-Natural Alliance (ice plant mats) in the MCV classification system.

Eucalyptus groves (*Eucalyptus* [*globulus*, *camaldulensis*] Semi-Natural Woodland Stands). Approximately 6.8 acres of eucalyptus groves occur south of the rail line in the western portion of the SMVR-SB railyard. This community is characterized by a dominant canopy of blue gum (*Eucalyptus globulus*) with an understory consisting of annual grasses and forbs, including ripgut brome and oxalis (*Oxalis pes-caprae*).

This community most closely corresponds with *Eucalyptus* spp. – *Ailanthus altissima* – *Robinia pseudoacacia* Woodland Semi-Natural Alliance in the MCV classification system. It may provide suitable habitat for roosting monarch butterfly and nesting raptors.

Other Land Cover Types

Ruderal / Disturbed. Ruderal vegetation communities comprise approximately 14 acres collectively and are present at each of the sites in the Project Area. These communities consist of fragmented strips and patches of vegetation and are subject to regular disturbance in the form of weed abatement (e.g., mowing, herbicide application) and vegetation suppression. They are characterized by remnant stands of scrub habitat with a significant component of non-native grasses and forbs, including fennel, tocalote, Russian thistle, red brome, charlock (*Sinapis* sp.), and crown daisy (*Glebionis coronaria*).

Although areas of ruderal vegetation do not correspond to a natural vegetation community under the MCV classification system, they may provide marginally suitable habitat for wildlife foraging and cover.

Developed. There are developed areas at each of the sites in the Project Area, comprising a total of approximately 171.62 acres. These include buildings and infrastructure, parking lots, roads, trails, and storage yards. This cover type also includes areas that are devoid of vegetation or

support scattered ornamental species or low densities of weeds due to continual disturbance by vehicles, pedestrians, or other anthropogenic means.

Noxious and Invasive Species

Per Executive Order 13112 Section 1, an invasive species is a species that is: (1) non-native (or alien) to the ecosystem under consideration; and (2) whose introduction causes or likely causes economic or environmental harm or harm to human health (US Department of Agriculture [USDA], 2022). Invasive species can be plants, animals, or other living organisms (e.g., microbes).

According to the California Invasive Plant Council (CAL-IPC), invasive plants are not native to an environment, and once introduced, establish quickly, reproduce, and spread, causing harm to the environment, economy, or human health (CAL-IPC, 2022a). Numerous nonnative plant species were identified in the Project area during 2020 through 2022 surveys. Some of these occur in well-established populations and appear to be associated with historic disturbance. A total of 57 of these nonnative plants are considered noxious or invasive weeds by the CAL-IPC (CAL-IPC, 2022b). Three of the noxious and invasive weeds observed in the Project area have been designated as a "high" threat level by CAL-IPC. Species with this designation have severe ecological impacts and moderate to high rates of dispersal and establishment. These include jubatagrass (*Cortaderia jubata*) observed at the DCPP site, highway iceplant (*Carpobrotus edulis*) and perennial pepperweed (*Lepidium latifolium*) observed at the SMVR-SB site. CAL-IPC considers several additional noxious and invasive weeds occurring in the Project area as a "moderate" threat to other plant species. Appendix E1 lists the noxious and invasive plant species that were identified in the Project area along with the current threat levels as defined by CAL-IPC.

Although not known from the Project area, New Zealand mudsnails (*Potamopyrgus antipodarum*), quagga mussel (*Dreissena rostriformis bugensis*), and zebra mussel (*Dreissena polymorpha*) are known to occur in California freshwaters and pose a risk to native species. For example, New Zealand mudsnails can consume up to half of the food resources in a waterway and have been linked to reduced populations of aquatic insects important to native fish. Further, quagga and zebra mussels have no natural predators in California and have tremendous reproductive potential. As a result, regulatory agencies, such as USFWS and CDFW, have implemented various programs to contain the distribution and spread of these species.

Common Wildlife

This section describes common terrestrial wildlife species that were documented during 2020 through 2022 surveys or have the potential to occur in the Project area (PG&E, 2020a; PG&E, 2021a). This section also discusses some species that have been designated as "Special Animals" or "Watch List" by CDFW. Although these species are tracked by CDFW, they are not afforded the same regulatory protections as special-status wildlife, which are discussed further below.

The Project area supports a wide range of vegetation communities associated with natural lands, riparian habitat, and disturbed and developed areas. The distribution of wildlife in the Project area varies depending on location, vegetation community, and disturbance level. The habitats with the greatest intrinsic value for terrestrial wildlife are provided within the riparian vegetation communities associated with Diablo Creek and smaller unnamed drainage features. These habitats contribute to the diversity and abundance of wildlife in the region as they provide for

permanent and migratory residency, foraging, and breeding behaviors. The creek bed and adjacent uplands provide breeding and refugia for a number of wildlife species. However, wildlife usage in the Project area is also influenced by former cattle grazing practices and ongoing human activity associated with operations at the DCPP site and railyard sites.

Invertebrates. As in all ecological systems, invertebrates play a crucial role in multiple biological processes. They serve as the primary or secondary food source to a variety of fish, amphibian, reptile, bird, and mammal consumers; they provide pollination vectors for numerous plant species; they act as efficient components in controlling pest populations; and they support naturally occurring maintenance of an area by consuming detritus and contributing to necessary soil nutrients.

Vegetation communities in the Project area provide a suite of habitat and microhabitat conditions for terrestrial and aquatic insects, mollusks, and other invertebrates. Focused insect surveys have not been completed for the Proposed Project; however, general habitat assessments and wildlife surveys performed from 2020 through 2022 detected a variety of insects and other invertebrates, including banana slug (*Ariolimax* sp.), garden snail (*Cornu aspersum*), American dog tick (*Dermacentor variabilis*), western honey bee (*Apis mellifera*), coyote brush leaf beetle (*Trirhabda flavolimbata*), armored stink beetle (*Eleodes armata*), and Sara orangetip (*Anthocharis sara*) (PG&E, 2020a; 2021a). Other common insect species most often identified in the general region include variable checkerspot (*Euphydryas chalcedona*), painted lady (*Vanessa cardui*), western tiger swallowtail (*Papilio rutulus*), yellow-faced bumble bee (*Bombus vosnesenskii*), Pacific velvet ant (*Dasymutilla aureola*), and Lompoc grasshopper, a CDFW Special Animal (iNaturalist, 2022). Additionally, numerous shoulderband snails (*Helminthoglypta* spp.) and decollate snails (*Rumina* spp.) were observed at several locations at the DCPP site during 2022 aquatic assessments, including Diablo Creek, the Marina, oak woodlands, and grassy slopes near the existing Firing Range. Several additional common terrestrial mollusks are known to occur in coastal San Luis Obispo County. These include garden snail (*Cornu aspersum*), rustic ambersnail (*Succinea rusticana*), California lancetooth snail (*Haplotrema minimum*), and greenhouse slug (*Milax gigates*), among many others (iNaturalist, 2022).

Fishes. Because fish movement throughout upstream portions of Diablo Creek are inhibited by various barriers, common fish in the portion at the DCPP site appears to be limited to non-native species, such as mosquito fish (*Gambusia affinis*) and prickly sculpin (*Cottus asper*). Other common fish species known to occur in nearby streams include Sacramento sucker (*Catostomus occidentalis*) and speckled dace (*Rhinichthys osculus*).

Amphibians. Amphibians often require a source of standing or flowing water to complete their life cycles. For many species, breeding takes place in aquatic habitats such as streams, creeks, and pools. Generally, the larval and juvenile stages occur within the same aquatic habitat. Although some amphibious species may remain within or adjacent to standing or flowing water for their entire lives, other species may spend significant portions of their adult lives in upland habitats surrounding their aquatic breeding sites. Some of these species may undertake long dispersal journeys to find new breeding sites. During the non-breeding season, amphibians in upland habitats will take refuge in underground burrows or under logs, rock piles, or leaf litter.

Common amphibians that were identified during 2020 through 2022 surveys were limited to observations near riparian habitats at the DCPP and PBR sites. These included Sierran tree frog (*Pseudacris sierra*) and California toad (*Anaxyrus boreas halophilus*) (PG&E, 2020a). Additional common amphibians that are known to occur in the general region include black-bellied slender salamander (*Batrachoseps nigriventris*), arboreal salamander (*Aneides lugubris*), and Baja California tree frog (*Pseudacris hypochondriaca*) (iNaturalist, 2022).

Reptiles. The number and type of reptile species that may occur in a given area is related to a number of biotic and abiotic features. These include the diversity of plant communities, substrate, soil type, and presence of refugia such as rock piles, boulders, and native debris. These represent crucial factors in the survival and reproductive success of various reptile species. Most reptiles, even if present in an area, are difficult to detect because they are cryptic, and various life history characteristics (i.e., foraging and thermoregulatory behavior) limit their ability to be observed during most surveys. Many species are active only within relatively narrow thermal limits, avoiding hot and cold conditions, and most take refuge in microhabitats that are not directly visible to the casual observer, such as rodent burrows, crevices, under rocks and branches, and in dense vegetation where they are protected from unsuitable environmental conditions and predators. In some cases, they are observed when flushed from their refugia. Although most reptile species are found in various upland habitats, there are many other aquatic and semi-aquatic species that can be found within and adjacent to streams, creeks, and other riparian features. These species may also be found in upland habitats when hibernating, seeking foraging opportunities, or dispersing to another aquatic habitat.

A total of six reptile species were observed at the DCPP and PBR sites during surveys conducted by Terra Verde from 2020 through 2022 (PG&E, 2020a; 2021a). These include Coast Range fence lizard (*Sceloporus occidentalis bocourtii*), woodland alligator lizard (*Elgaria multicarinata webbii*), San Diego gopher snake (*Pituophis catenifer annectens*), western yellow-bellied racer (*Coluber constrictor mormon*), California striped racer (*C. lateralis lateralis*), and northern pacific rattlesnake (*Crotalus oreganus oreganus*). Although no reptiles were observed at the SMVR-SB railyard site, other common reptiles known from the general area include California kingsnake (*Lampropeltis californiae*), ringneck snake (*Diadophis punctatus*), common garter snake (*Thamnophis sirtalis*), western whiptail (*Aspidoscelis tigris*), and common side-blotched lizard (*Uta stansburiana*) (iNaturalist, 2022).

Birds. Birds were the most commonly observed species in the Project area during surveys. The diversity of birds in the Project area is a function of the various riparian and upland vegetation communities that provide habitat for different groups of birds. For example, common shorebirds and aquatic species that were identified, such as western gull (*Larus occidentalis*), Brandt's cormorant (*Phalacrocorax penicillatus*), and pigeon guillemot (*Cepphus columba*), are closely associated with shoreline and sea cliff habitats bordering the DCPP site. Other common shorebirds and aquatic species that are routinely observed in the general region include marbled godwit (*Limosa fedoa*), willet (*Tringa semipalmata*), double-crested cormorant (*Phalacrocorax auratus*), and surf scoter (*Melanitta perspicillata*) (iNaturalist, 2022). Although briefly mentioned here, seabirds are fully addressed in Section 4.4 (*Biological Resources – Marine*).

Many bird species are closely associated with or dependent upon riparian vegetation associated with Diablo Creek and other drainage features in or near the Project area. Riparian systems are frequently considered one of the most productive forms of wildlife habitat in North America and many bird species are wholly, or at least partially, dependent on riparian plant communities for breeding and foraging (Motroni, 1979). Some of the songbirds commonly observed in these habitats include yellow-rumped warbler (*Setophaga coronata*), oak titmouse (*Baeolophus inornatus*), pacific-slope flycatcher (*Empidonax difficilis*), among many others.

Numerous avian species also utilize the various upland habitats in the Project area for breeding, migration, and foraging. Some of the common species that are typically associated with these habitats and were observed by Terra Verde during 2020 through 2022 surveys include California quail (*Callipepla californica*), California scrub jay (*Aphelocoma californica*), Nuttall's woodpecker (*Dryobates nuttalli*), northern flicker (*Colaptes auratus*), California towhee (*Melozone crissalis*), black phoebe (*Sayornis nigricans*), and white-crowned sparrow (*Zonotrichia leucophrys*) (PG&E, 2020a; 2021a).

The Project area provides various nesting, roosting, and foraging opportunities for common raptor species, including red-tailed hawk (*Buteo jamaicensis*), turkey vulture (*Cathartes aura*), and CDFW Special Animal and Watchlist species, such as Cooper's hawk (*Accipiter cooperii*) and osprey (*Pandion haliaetus*).

Mammals. The distribution of mammals in the Project area is associated with the presence of such factors as access to water, topographical and structural components (i.e., rock piles, vegetation, stream terraces). Upland habitats in the Project area, such as oak woodlands, shrublands, and grasslands, provide shelter and burrowing opportunities for arboreal and fossorial mammals. Similarly, riparian features in or adjacent to the Project area, such as Diablo Creek or Pismo Creek, provide breeding and foraging habitat along with local movement corridors for a variety of mammals.

Terrestrial mammals that were observed during surveys ranged from small species, such as California ground squirrel (*Otospermophilus beecheyi*) and Botta's pocket gopher (*Thomomys bottae*) to mid-sized species, including striped skunk (*Mephitis mephitis*), raccoon (*Procyon lotor*), and bobcat (*Lynx rufus*). Larger species, such as mule deer (*Odocoileus hemionus*) and coyote (*Canis latrans*) were also identified (PG&E, 2020a; PG&E, 2021a).

Although not detected during surveys, many common bat species, such as Mexican free-tailed bat (*Tadarida brasiliensis*), California myotis (*Myotis californicus*), and hoary bat (*Lasiurus cinereus*), a CDFW Special Animal, are known to occur from the general area and may roost in existing structures and adjacent habitats (iNaturalist, 2022).

Special Habitat Designations

Sensitive Natural Communities. Sensitive natural communities have been previously defined by CDFW as "...communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects." More recently CDFW stated that sensitive natural communities with state ranks of S1–S3 (S1=critically imperiled; S2=imperiled; S3=vulnerable) should be addressed in the environmental review processes of CEQA and its equivalents (CDFW, 2022c). "Provisional Alliances" are types for which there are fewer than 10

stands sampled, but which are expected to be more widespread. A question mark (?) denotes an inexact numeric rank because there are insufficient samples over the full expected range of the type, but existing information points to this ranking.

The CNDDB search identified records of nine sensitive natural communities within the 10-mile search for the Project area (CDFW, 2022a). These include central dune scrub, central foredunes, central maritime chaparral, coastal and valley freshwater marsh, northern interior cypress forest, serpentine bunchgrass, valley needlegrass grassland, coastal brackish marsh, and northern coastal salt marsh. Central dune scrub, central foredunes, coastal brackish marsh, and coastal saltmarsh are associated with coastal dune or estuarine habitat, none of which occur within the terrestrial habitats of the Project area.

Three vegetation communities, including coastal bluff scrub (Provisional), California coffeeberry scrub (Provisional), and bush monkeyflower scrub (S3?), that occur on the most recent CDFW list of California sensitive natural communities were mapped by PG&E at the DCPP site (CDFW, 2022c).

Sensitive Resource Areas (SRAs). The SRA combining designation (Section 23.07.160) is applied by the Official Maps of the San Luis Obispo County Code Land Use Element to identify areas with special environmental qualities or areas containing unique or endangered vegetation or habitat resources. The purpose of the SRA combining designation is to require that proposed uses be designed with consideration of the identified sensitive resources and the need for their protection. For any land use permit application within an SRA, the County can approve the permit if the following required findings can be met:

- The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the SRA designation and will preserve and protect such features through site design.
- Natural features and topography have been considered in the design and siting of all proposed physical improvements.
- Any proposed clearing of topsoil, trees, or other features is the minimum necessary to achieve safe and convenient access and siting of proposed structures and will not create significant adverse effects on the identified sensitive resource.
- The soil and subsoil conditions are suitable for any proposed excavation; site preparation and drainage improvements have been designed to prevent soil erosion and sedimentation of streams through undue surface runoff.

Environmentally Sensitive Habitat Areas (ESHAs). Section 30107.5 of the California Coastal Act of 1976 defines ESHAs as "A type of Sensitive Resource Area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and development". The characteristics of an ESHA are comprised of three important elements. First, a geographic area can be designated as an ESHA either because of the presence of individual species of plants or animals or because of the presence of a particular habitat. Second, the

species or habitat must be either rare or especially valuable. Third, the area must be vulnerable and exposed to human disturbance and degradation.

The SRA combining designation of the San Luis Obispo County Code provides additional requirements for SRAs that are located within the Coastal Zone, otherwise defined as ESHAs. Section 23.07.170 (Environmentally Sensitive Habitats) of the code includes the following ESHA descriptions:

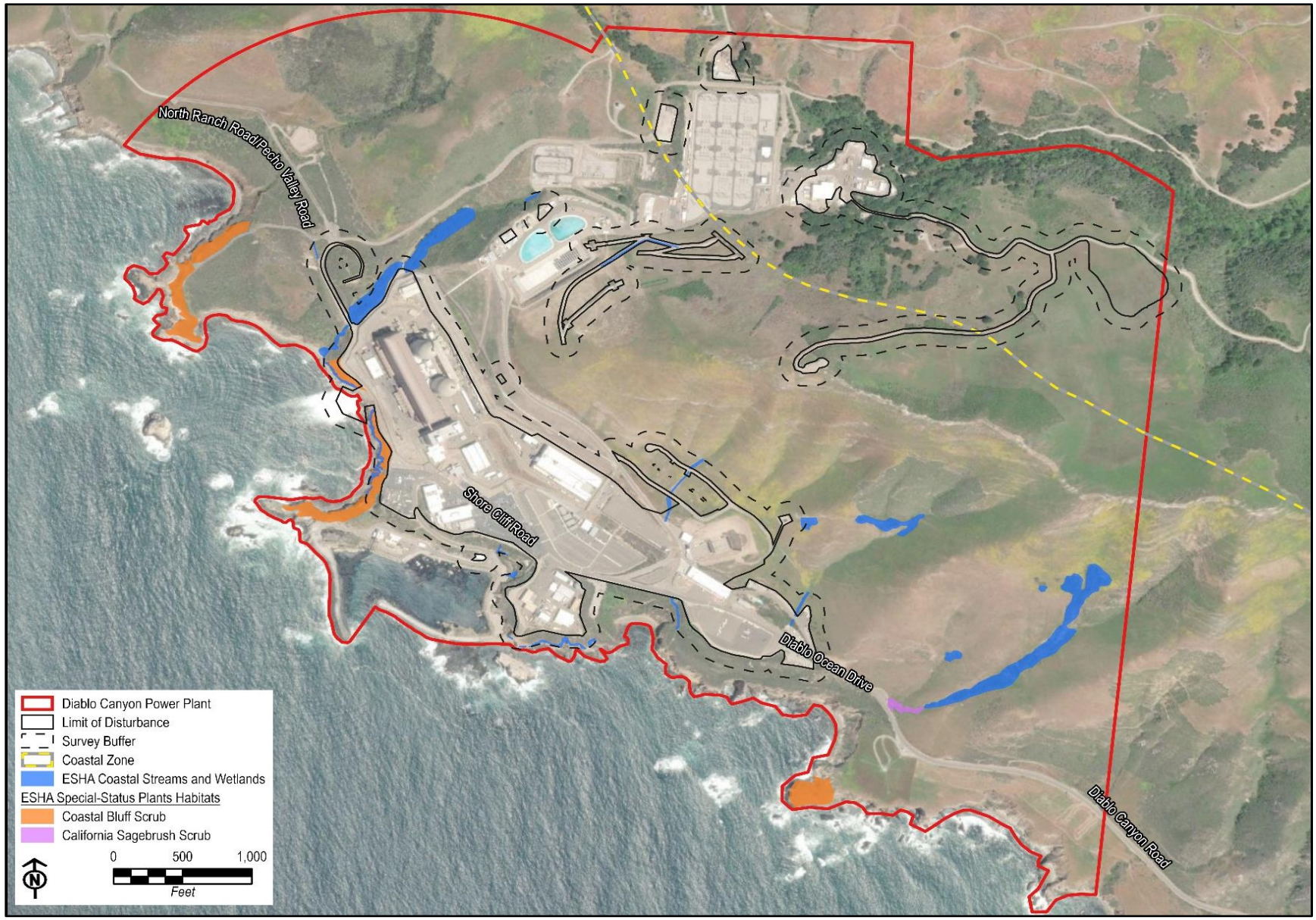
- Mapped ESHA – Includes wetlands, coastal streams, and riparian vegetation, terrestrial and marine habitats and are mapped as Land Use Element combining designations.
- Unmapped ESHA – Includes, but not limited to, known wetlands, coastal streams and riparian vegetation, terrestrial and marine habitats that may not be mapped as Land Use Element combining designations. The existence of an Unmapped ESHA is determined by the County at or before the time of application acceptance and shall be based on the best available information. Unmapped ESHA includes but is not limited to:
  - Areas containing features or natural resources when identified by the County or County approved expert as having equivalent characteristics and natural function as mapped other environmental sensitive habitat areas.
  - Areas previously known to the County from environmental experts, documents, or recognized studies as containing ESHA resources.
  - Other areas commonly known as habitat for species determined to be threatened, endangered, or otherwise needing protection.

Based on this definition, all drainages and wetlands identified within the Coastal Zone as well as some terrestrial habitats and vegetation communities are considered ESHAs. For this analysis unmapped ESHAs have been categorized as either Coastal Stream and Wetlands or Special-Status Plant Habitat.

Most of the DCPP site and small corner of the PBR site are located within the Coastal Zone and are therefore subject to ESHA requirements. Prior to field surveys, PG&E reviewed County of San Luis Obispo datasets for Wetlands and Riparian Vegetation Combining Designations and Environmentally Sensitive Habitats. Based on this review, two drainages that are designated as coastal streams in the datasets were identified as Mapped ESHAs within the DCPP site. These include Diablo Creek and an unnamed drainage in the southeast corner of the site (PG&E, 2020a).

PG&E identified two vegetation communities, including arroyo willow thickets and hardstem and California bulrush marshes, that were defined as Coastal Stream and Wetlands Unmapped ESHAs at the DCPP site due to the presence of hydrophytic vegetation. Additionally, portions of two vegetation communities were identified as Special-Status Plant Habitat Unmapped ESHAs at the DCPP site due to the presence of Hoffman's sanicle and ocean bluff milk-vetch in these areas. These include portions of coastal bluff scrub and California sagebrush scrub (see Figure 4.3-4 and Table 4.3-3).

Figure 4.3-4. DCPP Environmentally Sensitive Habitat Areas



Source: Esri, 2022; Terra Verde, 2022.

Table 4.3-3. ESHAs Documented within the DCPP Site

ESHA Category	DCPP Site (acres)	100-Foot Setback (acres)	Limits of Disturbance (acres)
Coastal Streams and Wetlands	7.94	1.97	0.06
Special-Status Plant Habitat	7.02	1.51	0.14
Total	**14.96**	**3.48**	**0.20**

Critical Habitat. No designated or proposed critical habitat for listed species occurs in the Project area. Although not currently listed as critical habitat, NMFS considers Diablo Canyon, including portions located within the DCPP site, as being a "historical steelhead bearing watershed", which defines watersheds that have been historically occupied by populations of steelhead but now have barriers that block migration to portions of the watershed (NMFS, 2013). Designated critical habitat for tidewater goby (*Eucyclogobius newberryi*) occurs along San Luis Obispo Creek south of Highway 101 and less than one-half mile downstream of the PBR site.

Special-Status Species

This section provides information on special-status plants and animals observed within the Project area or with a potential to be present. The specific habitat requirements and the locations of known occurrences of each special-status species were the principal criteria used for inclusion in the lists of special-status species potentially occurring within the Project area. For this document, special-status species include the following designations:

- Rare, threatened, or endangered by CDFW and/or USFWS, and protected under Federal Endangered Species Act (FESA) and/or California Endangered Species Act (CESA) (FE – Federally Endangered; FT – Federally Threatened; SE – State Endangered; ST – State Threatened)
- Candidate species being considered or proposed for listing under these same acts (FC – Federal Candidate; SC – State Candidate)
- Fully Protected by the California Fish and Game Code, Sections 3511, 4700, 5050, or 5515 (FP – State Fully Protected)
- Considered Species of Special Concern by the CDFW (SSC – Species of Special Concern)
- Designated as CRPR 1, 2, 3, or 4 plant species
- Are of expressed concern to resource/regulatory agencies or local jurisdictions

Special-Status Terrestrial Plant Species

Although no federal or State listed plant species were identified during botanical surveys, the DCPP and PBR sites are within the current ranges for marsh sandwort (*Arenaria paludicola*) (FE, SE, CRPR List 1B.1), La Graciosa thistle (*Cirsium scariosum* var. *loncholepis*) (FE, ST, CRPR List 1B.1), Pismo clarkia (*Clarkia speciosa* ssp. *immaculata*) (FE, SR, CRPR List 1B.2), Gambel's water cress (*Nasturtium gambelii*) (FE, ST, CRPR List 1B.1), and adobe sanicle (*Sanicula maritima*) (SR, CRPR List 1B.1). However, the sites lack suitable habitat for these species, and they are not

expected to occur. Due to a lack of suitable habitat, federal or State listed plants are also not expected to be present at the SMVR-SB site.

Four non-listed special-status terrestrial plant species were either observed during 2020 through 2022 botanical surveys or are assumed to be present in the Project area (PG&E, 2020a; 2021a; 2022a; 2022b) (see Figure 4.3-5). These include Hoffman's sanicle (*Sanicula hoffmannii*) and San Diego County viguiera (*Bahiopsis laciniata*), both CRPR List 4.3 species, which were observed at the DCPP site. However, the San Diego viguiera occurrence is considered anomalous and was likely artificially dispersed at the DCPP site. As such, it is not afforded protection under CEQA and will no longer be discussed in this document. Ocean bluff milk-vetch (*Astragalus nuttallii* var. *nuttallii*), a CRPR List 4.2 species, is assumed to be present based upon the proximity of a known population located immediately north of the DCPP site. Black-flowered figwort (*Scrophularia atrata*), designated as a CRPR 1B.2 species, was observed in scrub habitat along the northern edge of the PBR site (see Figure 4.3-6). No special-status plants were identified at the SMVR-SB site during 2020 through 2022 botanical surveys.

An additional 39 special-status terrestrial plant species were considered for this analysis. No CRPR List 1.B or 2 species are expected to occur due to known ranges and lack of suitable habitat. A complete list of all special-status plant species that were considered for this analysis is provided in Appendix E2. Descriptions for the special-status plant species that were observed or have the potential to occur are provided in Appendix E3.

Special-Status Terrestrial Wildlife Species

A total of five special-status terrestrial wildlife species were observed in the Project area during surveys performed in 2020 through 2022, including Steelhead – South-Central California Coast Distinct Population (SCCC DPS) (*Oncorhynchus mykiss*) (FT), California red-legged frog (*Rana draytonii*) (FT), brown pelican (*Pelecanus occidentalis*) (FP), American peregrine falcon (*Falco peregrinus anatum*) (FP), and San Diego desert woodrat (*Neotoma lepida intermedia*) (SSC) (PG&E, 2020a; 2021a; 2022c; 2022d; 2022e) (see Figures 4.3-5 through 4.3-7).

Invertebrates. There were no special-status invertebrates detected at the DCPP, PBR, or SMVR-SB site during surveys conducted from 2020 through 2022, and critical habitat for federally-listed invertebrates does not occur at any of the Project sites.

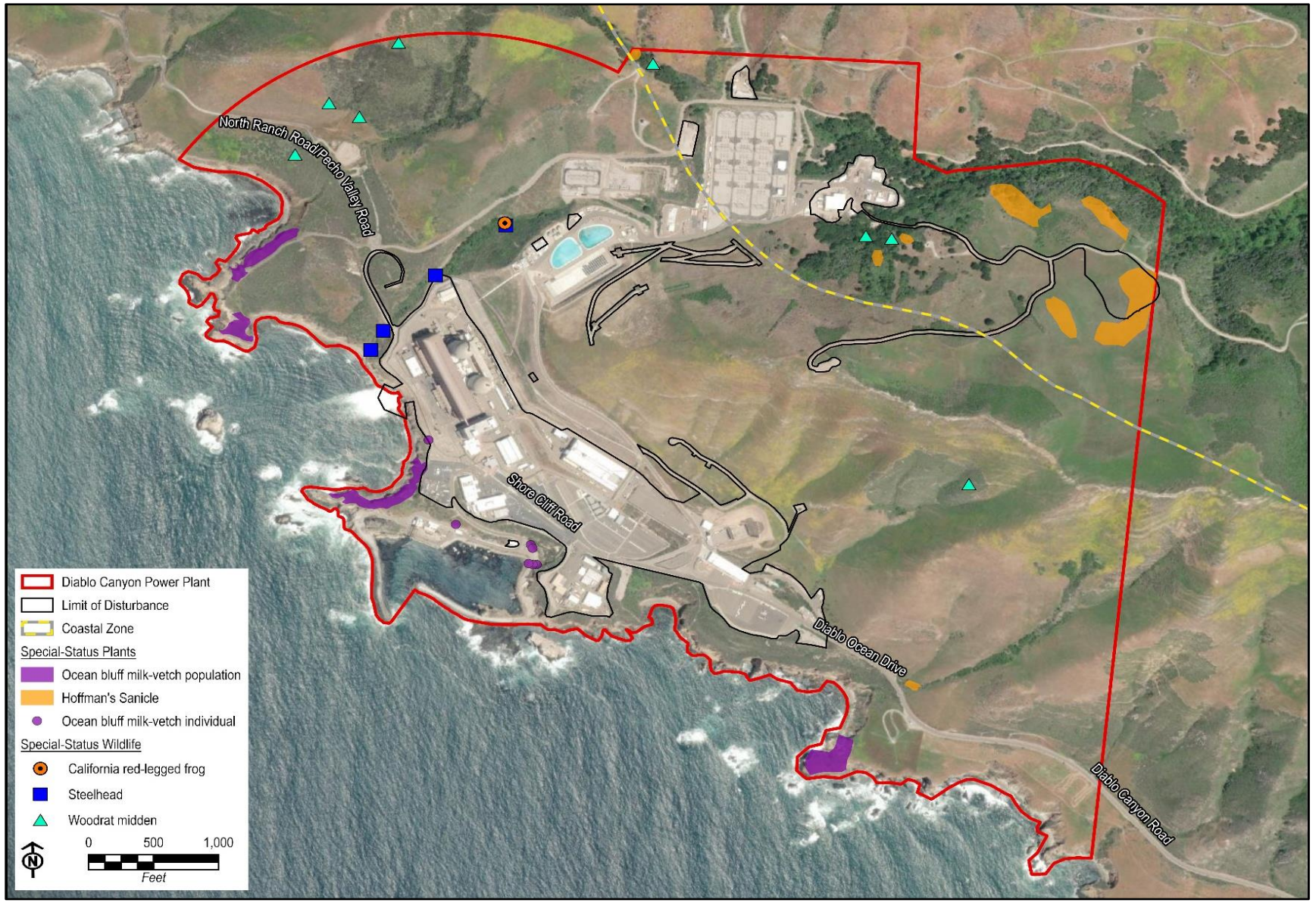
The DCPP site has a low potential to support Morro shoulderband snail (*Helminthoglypta walkeriana*). Morro shoulderband snail have an extremely limited distribution and prefer sandy soils associated with a variety of native and non-native vegetation communities, debris piles, and leaf litter. This species is most commonly associated with sandy soils in coastal dune and dune scrub habitat in the immediate vicinity of Morro Bay; however, there are recent research-grade records from farther inland locations within Montaña de Oro State Park, just north of the DCPP site (iNaturalist, 2022). Further, recent surveys have demonstrated that the species occupies a diversity of both native and non-native habitats throughout its geographic range (San Luis Obispo, 2013; San Luis Obispo, 2014). It may also occur inland in coastal sage scrub and grasslands with shrubs that provide canopy and leaf litter (USFWS, 2003). Soil maps of the DCPP site indicate that some areas may consist of sandy loams yet the scale of these maps do not

adequately reflect microhabitat conditions that could potentially support Morro shoulderband snails at the DCPP site.

Suitable foraging and nesting habitat for Crotch's bumble bee (*Bombus crotchii*) (SC) occurs throughout the general region, particularly in open grasslands and scrub communities in and adjacent to the DCPP site. Crotch's bumble bee is one of four species of bumblebee identified as species of greatest conservation need that are currently being tracked by the CNDDB. Although Crotch's bumble bee was petitioned for state listing in 2018 and was subsequently advanced to state candidacy in 2019, the Superior Court ruled in 2020 that insects are not eligible for listing under CESA. However, citing that CESA is part of the California Fish and Game Code which defines "fish" as any "mollusk, crustacean, invertebrate, or amphibian", the State Supreme Court reversed this judgment and the CDFW Commission reinstated candidacy for the four bumblebee species, including Crotch's bumblebee, in 2022 (Supreme Court Case S275412).

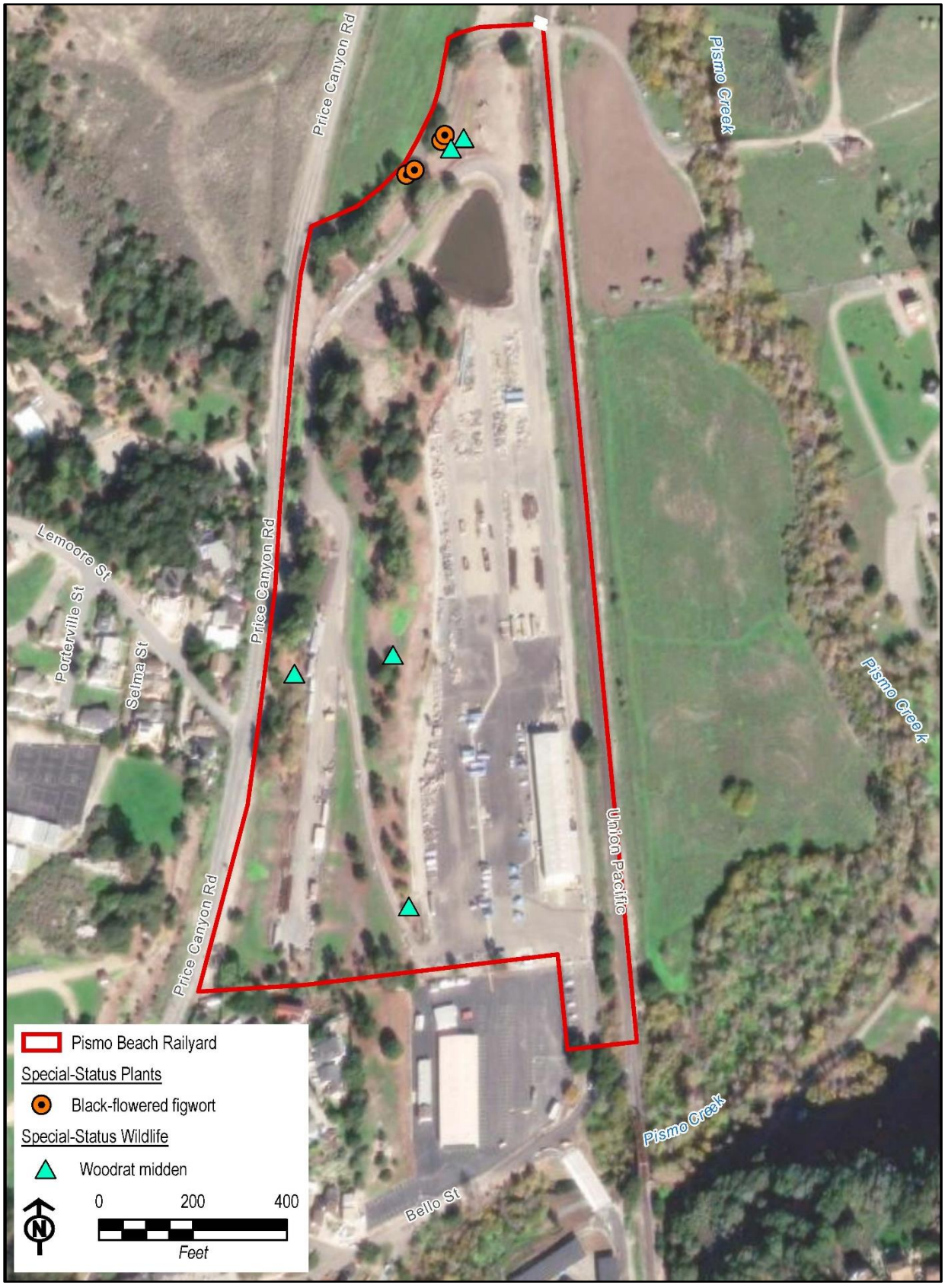
Monarch butterfly (overwintering population) (*Danaus plexippus* – pop. 3) (FC) roost in wind-protected tree groves, primarily preferring eucalyptus trees. The DCPP site does not support suitable habitat for monarch butterfly; however, this species could occur as a migrant that moves through the area to preferable overwintering sites along the coast. Suitable overwintering habitat for monarch butterfly does occur in ornamental groves of trees within and immediately adjacent to the PBR site and in a eucalyptus grove present at the SMVR-SB site. Further, this species is known to roost at sites located approximately one-quarter mile south of the PBR site and adjacent to the City of Santa Maria within 5 miles of the SMVR-SB site (iNaturalist, 2022).

Figure 4.3-5. DCPP Special-Status Plants and Wildlife



Source: Esri, 2022; PG&E, 2021c.

Figure 4.3-6. PBR Special-Status Plants and Wildlife



Source: Esri, 2022; PG&E, 2021c.

Figure 4.3-7. Tom's Pond Special-Status Wildlife

Source: Esri, 2022; PG&E, 2021

Fishes (Non-Marine). Steelhead was the only special-status fish species observed in the Project area during 2020 habitat assessments (PG&E, 2020a) (see Figure 4.3-5). Critical habitat for federally-listed fishes does not occur at any of the Project sites.

At the DCPP site, various age classes of the steelhead resident form were identified within Diablo Creek inhabiting the three scour pools and channel areas downstream of the 230 kV and 500 kV switchyards (PG&E, 2020a). The resident form of the species appears to be utilizing the lower stream section of Diablo Creek, although available spawning habitat would be limited to an estimated 250-foot section of stream channel due to passage barriers, such as Diablo Canyon Road/Diablo Ocean Drive (PG&E, 2020a). For the purposes of this analysis, the resident and anadromous forms of the species are collectively discussed since the potential exists for the latter to access Diablo Creek during periods of high flows and high tides. Although the PBR site does not support perennial stream habitat, the portion of Pismo Creek located less than one-quarter mile to the south is included in the USFWS final designation of critical habitat for the steelhead SCCC DPS. According to the NMFS, recent and reliable data is notably absent from the primary core population in Pismo Creek (NMFS, 2016). It is suggested, however, that there are very small (< 10 adults) but persistent runs in most streams at the southern edge of the SCCC DPS range each year, except in years when there have been insufficient winter flows to breach bars at the mouths of lagoons (Williams et al., 2016). For the purposes of this analysis, it is assumed that steelhead are present in, or will occupy over time, the portion of Pismo Creek within the vicinity of the PBR site.

Amphibians. California red-legged frog was the only special-status amphibian observed in the Project area during surveys (see Figure 4.3-5). Critical habitat for federally-listed amphibians does not occur at any of the Project sites.

California red-legged frog was observed within a scour pool at the DCPP 230 kV and 500 kV switchyard culvert outlet in the lower section of Diablo Creek (PG&E, 2020a; 2020e). The species was also detected at Tom's Pond, a perennial pond located approximately 1.5 miles north of the DCPP site (PG&E, 2020e) (see Figure 4.3-7). Suitable breeding habitat for this species was identified within slow-moving, perennial waters along the lower reach of Diablo Creek. Additionally, emergent vegetation along the creek provides suitable substrate on which to lay eggs. The shoreline edge of Tom's Pond provides suitable breeding habitat for red-legged frog due to the protection from terrestrial predators by thick vegetation. Although California red-legged frog was not observed at the PBR site during protocol-level surveys conducted in 2020, suitable breeding habitat is present along Pismo Creek just south of the site and it has been documented less than 1 mile away (iNaturalist, 2022). If present, the species may also utilize native upland habitats that occur within and adjacent to the PBR site for aestivation, dispersal, and foraging. Detention basins, water conveyance structures, and other manmade features, such as Guadalupe Lake, located near the SMVR-SB site, provide marginal breeding habitat for California red-legged frog, particularly during periods of above average precipitation when surface water is permanent or nearly permanent over the breeding season. Agricultural fields and ruderal habitats adjacent to the SMVR-SB site provide marginal dispersal and foraging habitat for the species.

California tiger salamander (FE, ST) is known from the County of San Luis Obispo but has not been found in this section of the coast. A study completed for the USFWS in 2009 found that there is an approximate 55-mile-wide distributional gap between native tiger salamander populations in northeastern San Luis Obispo County and northwestern Santa Barbara County (USFWS, 2009). Although this species was not observed at the DCPP site during surveys of Diablo Creek or Tom's Pond, potential breeding habitat is present at Tom's Pond and suitable aestiva-

tion habitat for it is present in upland areas surrounding Diablo Creek and Tom's Pond (PG&E, 2022d). It is known to share the same breeding and overwintering habitat as California red-legged frog (Alvarez et al., 2013; Fellers et al., 2001). Therefore, there is a low potential for California tiger salamander to occur at the DCPP site. The SMVR-SB site is within the dispersal range of one documented breeding pond and four potential breeding ponds for California tiger salamander; however, habitat assessments determined that the potential for the species to occur, even infrequently, is marginal based on mostly paved surfaces at the facility, poor quality upland habitat, and intensive agriculture within the dispersal path between source populations and the SMVR-SB site (PG&E, 2022c).

Coast range newt (*Taricha torosa*) (SSC) and lesser salamander (*Batrachoseps minor*) (SSC) also have the potential to occur along Diablo Creek and in adjacent upland habitats, particularly oak woodlands.

Reptiles. There were no special-status reptiles detected at the DCPP, PBR, or SMVR-SB sites during surveys conducted from 2020 through 2022. There is no critical habitat for federally-listed reptiles at any of the Project sites.

Although not observed during surveys, the DCPP site supports suitable habitat for several non-listed special-status reptiles, including western pond turtle (*Emys marmorata*) (SSC), California legless lizard (*Anniella pulchra*) (SSC), coast horned lizard (*Phrynosoma blainvillii*) (SSC), and two-striped garter snake (*Thamnophis hammondii*) (SSC). There is a moderate to high potential for any of these species to occur.

Western pond turtle and two-stripe garter snake are primarily aquatic species but use upland habitats during breeding and overwintering. Suitable aquatic habitat for these species occurs along Diablo Creek and most of the undeveloped areas at the DCPP site provide potential upland habitat used by western pond turtle and two-striped garter snake for refuge, cover, foraging, or nesting sites. Additionally, the riparian corridor along Pismo Creek and agricultural basins and irrigation canals adjacent to the SMVR-SB site support suitable aquatic habitat for these species; however, the PBR or SMVR-SB sites do not support suitable upland habitat and these species are not expected to utilize the site for aestivation or foraging.

Suitable habitat for California legless lizard and coast horned lizard occurs within most of the undeveloped areas throughout the DCPP site, particularly in scrub or woodland habitats where friable soils, leaf litter, and other refuge sites are available. Loose soils and small patches of native vegetation in and around the PBR and SMVR-SB sites, support suitable habitat for the California legless lizard and there is a high potential for it to occur.

Birds and Raptors. Special-status birds that were observed during surveys include American peregrine falcon (FP) and brown pelican (FP). There is no critical habitat for federally-listed birds at any of the Project sites.

American peregrine falcon was observed perched near Diablo Creek (PG&E, 2020a). There are several established breeding territories for this species along the coast of San Luis Obispo County and it is known to nest along cliffs within and near the DCPP site (CDFW, 2022d). Suitable foraging habitat occurs throughout most of the Project area. Brown pelican was observed flying along the coastal bluffs near the DCPP site (PG&E, 2020a). Although this species does not nest

in the area, suitable roosting habitat is present within the terrestrial areas of the DCPP site where it is known to roost along the breakwater.

Although not detected during surveys, the Project area provides suitable breeding or foraging habitat for several additional special-status bird and raptor species. White-tailed kite (*Elanus leucurus*) (FP) and loggerhead shrike (*Lanius ludovicianus*) (SSC) may utilize suitable nesting habitat in oak woodlands on the upper terraces or dense riparian trees along Diablo Creek at the DCPP site or marginal habitat near the PBR site. Burrowing owl (*Athene cunicularia*) (SSC) have been documented overwintering in the vicinity of each of the Project sites, but have not been reported nesting (SWCA, 2016; iNaturalist, 2020). California condor (*Gymnogyps californianus*) (FE, SE, FP), bald eagle (*Haliaeetus leucophalus*) (SE, FP), and golden eagle (*Aquila chrysaetos*) (FP) are not expected to breed within the Project area. California condor, however, may occur as a rare forager in open spaces within the Project area. Bald eagle may be observed foraging along the coastline and there are several recent records of this species located near the southern shore of Morro Bay less than 5 miles from the DCPP site (iNaturalist, 2022). Similarly, golden eagle has been observed within 1 mile of the DCPP site and suitable foraging habitat occurs at each of the Project sites. The Project area also supports suitable foraging habitat for northern harrier (*Circus hudsonius*) (SSC), long-eared owl (*Asio otus*) (SSC), and tricolored blackbird (*Agelaius tricolor*) (SSC).

Mammals. San Diego desert woodrat (SSC) was the only special-status mammal detected during surveys conducted for the Proposed Project (PG&E, 2020a) (see Figures 4.3-5 and 4.3-6). There is no critical habitat for federally-listed mammals at any of the Project sites.

Although San Diego desert woodrat was not observed during surveys, several middens were recorded within scrub, chapparal, and woodland habitats throughout the DCPP site and in the northern portion of the PBR site (PG&E, 2020a).

Due to the wide-ranging movement of mid- to large-sized mammals, including American badger (*Taxidea taxus*) (SSC), ringtail (*Bassariscus astutus*) (FP), and mountain lion (Southern California/ Central Coast ESU [SC]), there is a potential for these species to occur in the Project area. Suitable habitat for American badger occurs in open fields surrounding the DCPP site and this species has been observed by PG&E staff at the site. Ringtail has not been reported in or near the Project area; however, this species is not tracked by CDFW in the CNDDB. There are recent records located several miles to the northwest near the City of Cambria and several miles to the southeast near Sedgwick Reserve (iNaturalist, 2022). Given the lack of records and the elusive nature of the ringtail, there is a potential for this species to occur within the foothills and canyons surrounding the DCPP site and along Diablo Creek. Mountain lion have been recently reported from Montaña de Oro State Park just north of the DCPP site and in the foothills above Pismo Beach (iNaturalist, 2022).

Additionally, the various structures and tree groves at, or adjacent to, each of the Project sites support potential roosting habitat for special-status bats, including pallid bat (*Antrozous pallidus*) (SSC), Townsend's big-eared bat (*Corynorhinus townsendii*) (SSC), western mastiff bat (*Eumops perotis californicus*) (SSC), and big-free-tailed bat (*Nyctinomops macrotis*) (SSC).

A complete list of all special-status terrestrial wildlife species that were considered for this analysis is provided in Appendix E2. Descriptions for the species that were observed or have the potential to occur are provided in Appendix E3.

Wildlife Corridors and Special Linkages

Studies suggest that habitat fragmentation and isolation of natural areas ultimately results in the loss of native species within those communities (Soule et al., 1988). The ability for wildlife to move freely among populations is important to long-term genetic variation and demography. Fragmentation and isolation of natural habitat may cause loss of native species diversity in fragmented habitats. In the short term, wildlife movement may also be important to individual animals' ability to occupy home ranges, if a species range extends across a potential movement barrier. These considerations are especially important for rare, threatened, or endangered species, and wide-ranging species such as large mammals, which exist in low population densities.

Ultimately, linkages and corridors facilitate regional animal movement. Corridors offer wildlife unobstructed terrain for foraging and for dispersal of young individuals. Riparian corridors and areas of natural vegetation remain a common pathway utilized by many species because they typically provide cover, foraging opportunities, and water. However, as the movements of wildlife species are more intensively studied using radio-tracking devices, there is mounting evidence that some wildlife species do not restrict their movements to some obvious landscape element, such as a riparian corridor. For example, radio-tracking and tagging studies of newts, California red-legged frogs, and western pond turtles found that long-distance dispersal involved radial or perpendicular linear movements away from a water source with little regard to the orientation of the assumed riparian "movement corridor," but towards suitable riparian or upland wintering habitat (Fellers and Kleeman, 2007; Semlitsch, 1998; Reese and Welsh, 1997).

There has been no known widespread analysis of wildlife movement conducted in the Project area. Nonetheless, large tracts of grassland habitat and extensive rangeland surrounding the DCPP site likely support the broad movement of many wildlife species. Riparian woodlands associated with Diablo Creek provide a linear movement corridor from natural areas within the Irish Hills to the coastal bluffs along the boundary of the DCPP site. Although the DCPP site is relatively porous in undeveloped areas, the fenced and developed portions of the site likely inhibit some broad and linear wildlife movement in the area.

The areas surrounding each of the railyard sites have been heavily fragmented by development, including existing rail facilities, agricultural fields, and roads. Due to this fragmentation, general wildlife movement is likely restricted or constrained through these areas. However, Pismo Creek, located adjacent to the PBR site supports an important riparian corridor for many wildlife species.

Jurisdictional Waters and Wetlands

DCPP. The DCPP site is located within the Irish Hills Coastal Watershed (SLO Watershed Project, 2021). The Irish Hills Coastal Watershed drains 27,922 acres or approximately 44 square miles. The Irish Hills Coastal Watershed is in the San Luis Range, along the remote San Luis Obispo County coastline between the communities of Los Osos and Avila Beach. The drainages rise to a

maximum elevation of 1,819 feet above MSL at Saddle Peak. The watershed is dominated by grazing lands, some of which are in conservation or agricultural easements, and public lands.

An initial wetland assessment was performed by PG&E in June 2020 and identified 8 jurisdictional drainage features within or adjacent to the DCPP site (PG&E, 2020a). In addition, nine artesian springs were identified, seven of which are directly associated with mapped drainages. However, this assessment did not include a formal delineation per federal and State guidelines. Therefore, Aspen conducted a preliminary assessment of jurisdictional wetlands and waters in July 2022 to determine the extent of resources under the jurisdiction of the USACE, the CCRWQCB, the California Coastal Commission (CCC), and CDFW that occur within the DCPP site (see Appendix E4).

Prior to conducting the preliminary assessment, Aspen reviewed current and historic aerial photographs; detailed topographic maps (1-foot intervals); the Soil survey of San Luis Obispo County, California, coastal part Soil Survey; and the local and State hydric soil list to evaluate the potential active channels and wetland features that occur at the site (Natural Resource Conservation Service [NRCS], 2022a; 2022b). The survey area for the assessment included the limits of disturbance and a 100-foot survey buffer (collectively referred to as "the survey area"). During the assessment, vegetation, hydrology, and locations of soil test pits were mapped using an Apple iPad paired with an Arrow GPS unit and identified on aerial photographs. Field maps were digitized using Global Information Technology (GIS) and total jurisdictional area for each feature was calculated (see Appendix E4).

Four categories of jurisdictional features were identified within the survey area. These included approximately 2.8 acres of USACE non-wetland waters of the US, 3.4 acres of CCRWQCB non-wetland waters of the state, 0.01 acres of CCC wetlands, and 5.7 acres of CDFW jurisdictional streambeds and vegetation (see Figure 4.3-8). The CCC wetland appears to have been recently formed by a leaking pipe and is located adjacent to the Marina. Table 4.3-4 provides a summary of jurisdictional acreages calculated for the DCPP site.

The most prominent jurisdictional feature at the DCPP site is Diablo Creek, which flows west out of the Irish Hills and traverses the site along the northern edge of the developed area at the DCPP site. Diablo Creek is a single channel creek characterized by a narrow low-flow channel varying in depth from 1 to 3 feet bordered by low terraces and deeply incised banks. Substrate in the channel varies from fine sized sediments (silt and clay) to coarse cobble and boulders (PG&E, 2020a). Above the switchyards, Diablo Creek enters an underground culvert (for approximately 2,714 linear feet) and flows beneath the 230 kilovolts (kV) and 500 kV switchyards. From here, the creek drains directly into the Pacific Ocean and forms the western boundary of Parcel P at the DCPP site (see Figure 2-2, DCPP Site). Diablo Creek is occupied by steelhead and potentially other fish species and supports a broad riparian corridor dominated by coast live oak, arroyo willow, and big-leaf maple.

Figure 4.3-8. DCPP Jurisdictional Waters

Source: Esri, 2022; Terra Verde, 2022.

Table 4.3-4. Summary of Jurisdictional Resources Within the Survey Area at the DCPP Site

	USACE Waters and Wetlands (acres)[1]		CCRQWCB Waters and Wetlands (acres)[1]		CCC Wetland (acres)	CDFW Streambeds (acres)
	Non-wetland Waters of U.S.	Wetlands	Non-wetland Waters of State	Wetlands		
Limits of Disturbance (Temporary Impact Area)	0.79	--	1.07	--	--	1.17
Survey Buffer (Indirect Impact Area)	1.99	--	2.29	--	0.01	4.52
Total Survey Area	2.78	--	3.36	--	0.01	5.69

Source: Table 5 in Appendix E4.

[1] Non-wetland Waters of the United States and Non-wetland Waters of the State overlap; as such, jurisdictional acreages are not additive.

The remaining non-wetland features identified at the DCPP site are characterized as ephemeral swales, erosional rills, small drainages, and concrete-lined ditches. The importance of ephemeral streams to wildlife in arid environments is well known (Levick et al., 2008). Ephemeral features similar to those occurring at the DCPP site provide unique habitat that is distinct from the surrounding uplands as they are typically characterized by a more continuous vegetation cover and greater microtopographic diversity. In the arid west, ephemeral streams provide important habitat for wildlife and are responsible for much of the biotic diversity in an area (Levick et al., 2008). They have higher moisture content and provide shade and cooler temperatures within the channel.

Pismo Beach Railyard. PG&E conducted an initial wetland assessment for the PBR site in June 2020 (PG&E, 2020a). One drainage feature and 5 wetlands, which included 3 isolated wetlands and 2 in-channel wetlands, were identified within the survey area. The drainage feature is a manmade ditch located along the eastern border of the PBR site that flows south into Pismo Creek, just south of the site. No formal delineation was completed for this feature; however, it was assumed to meet the requirements of USACE waters of the US and CCRWQCB and CDFW waters of the state due evidence of an ordinary high-water mark (OHWM) and a clearly defined bed and bank. The isolated wetlands were delineated following USACE guidelines; however, since each are hydrologically separated, they would not meet USACE jurisdiction but were determined to meet CCRWQCB and CDFW jurisdiction (PG&E, 2020a). Although the in-channel wetlands were not formally delineated, they were identified within the OHWM of the drainage feature and were assumed to meet the requirements of both federal and state wetlands under the jurisdiction of USACE, CCRWQCB, and CDFW.

Although not within the PBR site, Pismo Creek, a perennial blue line drainage is located just south of the site where it generally flows southwest and eventually drains to the Pacific Ocean.

SMVR-SB Railyard. PG&E did not identify any wetlands or other jurisdictional features at the SMVR-SB site (PG&E, 2021a). Guadalupe Lake, which appears to be a highly modified feature that is seasonally tilled and planted and may pond on occasion during relatively wetter years, is located approximately 350 feet south of the SMVR-SB site.

4.3.2 Regulatory Setting

Relevant federal and state laws, regulations, and policies that pertain to biological resources are summarized in Appendix C. The discussion below provides a summary of the County of San Luis Obispo land use plans, and those plans relevant to the railyards, that pertain to the biological resources.

County of San Luis Obispo General Plan: Conservation and Open Space Element (COSE). The COSE is a tool to protect and preserve sensitive and unique biological resources. The COSE provides goals, policies, and implementation strategies to identify and protect biological resources that are a critical component of the County's environmental, social, and economic well-being. Goals included in the COSE include:

- Goal BR 1 – Native habitat and biodiversity will be protected, restored, and enhanced.
- Goal BR 2 – Threatened, rare, endangered, and sensitive species will be protected.
- Goal BR 3 – Maintain the acreage of native woodlands, forests, and trees at 2008 levels.
- Goal BR 4 – The natural structure and function of streams and riparian habitat will be protected and restored.
- Goal BR 5 – Wetlands will be preserved, enhanced, and restored.
- Goal BR 6 – The County's fisheries and aquatic habitats will be preserved and improved.
- Goal BR 7 – Significant marine resources will be protected.

The COSE also includes specific policies and implementation strategies for each goal identified above to protect and maintain sensitive biological resources.

San Luis Obispo County Code Title 22 Land Use Ordinance. The Land Use Ordinance is the primary tool used by the County to carry out the goals, objectives, and policies of the General Plan. The Land Use Ordinance uses combining designations to identify and highlight areas of the County having sensitive natural or built features. The Sensitive Resource Area (SRA) combining designation is applied to areas of the County with special environmental qualities, or areas containing unique or endangered vegetation or habitat resources. Section 22.14.10 of the Land Use Ordinance provides combining designation standards that require proposed uses be designed with consideration of the identified sensitive resources and the need for their protection.

San Luis Obispo County Code Title 23 Coastal Zone Land Use Ordinance. The Coastal Zone Land Use Ordinance was created to protect and enhance the significant natural resources within the County and applies to all land use and development activities within the unincorporated areas of the County that are located within the California Coastal Zone established by the California Coastal Act of 1976. The ordinance includes the following sections pertaining to sensitive biological resources:

- Section 23.05.042 (Drainage Plan Required) – Requires the County review and approval of a drainage plan prior to the issuance of land use or construction permits for applicable projects.
- Section 23.05.060 (Tree Removal) - Provides standards to protect existing trees and other coastal vegetation from indiscriminate or unnecessary removal consistent with Local Coastal

Plan policies and pursuant to Section 30251 of the California Coastal Act. As defined in the ordinance, "tree removal" means the destruction or displacement of a tree by cutting, bulldozing, or other mechanical or chemical methods, which results in physical transportation of the tree from its site and/or death of the tree.

- Section 23.05.062 (Tree Removal Permit Required) - A tree removal permit is required for the removal of any tree within the Coastal Zone with trunks measuring 8 inches or greater in diameter at four feet above grade.
- Section 23.05.064 (Tree Removal Standards) – Any tree removed to accommodate new development or because it is a safety hazard shall be replaced, in a location on the site and with a species common to the community, as approved by the Planning Director.
- Section 23.07.160 (Required Findings) – Any land use permit application within a Sensitive Resource Area shall be approved only where the Review Authority can make the following required findings:
  - The development will not create significant adverse effects on the natural features of the site or vicinity that were the basis for the Sensitive Resource Area designation, and will preserve and protect such features through site design.
  - Natural features and topography have been considered in the design and siting of all proposed physical improvements.
  - Any proposed clearing of topsoil, trees, or other features is the minimum necessary to achieve safe and convenient access and siting of proposed structures, and will not create significant adverse effects on the identified sensitive resource.
  - The soil and subsoil conditions are suitable for any proposed excavation; site preparation and drainage improvements have been designed to prevent soil erosion, and sedimentation of streams through undue surface runoff.
- Section 23.07.170 (Environmentally Sensitive Habitats) – Applies to development proposed within or adjacent to (within 100 feet of the boundary of) an ESHA. The County ordinance separates ESHAs into two categories:
  - Mapped ESHA – Includes wetlands, coastal streams, riparian vegetation, terrestrial and marine habitats; and, are mapped as Land Use Element combining designations.
  - Unmapped ESHA – Includes, but are not limited to, known wetlands, coastal streams and riparian vegetation, terrestrial and marine habitats that may not be mapped as Land Use Element combining designations. The existence of an Unmapped ESHA is determined by the County at or before the time of application acceptance and shall be based on the best available information. Unmapped ESHA includes but is not limited to:
    - Areas containing features or natural resources when identified by the County or County approved expert as having equivalent characteristics and natural function as mapped other environmental sensitive habitat areas.
    - Areas previously known to the County from environmental experts, documents, or recognized studies as containing ESHA resources.

- Other areas commonly known as habitat for species determined to be threatened, endangered, or otherwise needing protection.

- Section 23.07.172 (Wetlands) - Provides requirements for development within or adjacent (within 100 feet of the upland extent of) wetlands and wetland areas that are defined as ESHAs. The requirements are intended to maintain the natural ecological functioning and productivity of wetlands and estuaries and, where feasible, to support restoration of degraded wetlands.

- Section 23.07.174 (Streams and Riparian Vegetation) – Provides provisions intended to preserve and protect the natural hydrological system and ecological functions of coastal streams. Requires that new development be setback from the upland edge of riparian vegetation the maximum extent feasible. In urban areas (inside the URL) this setback shall be a minimum of 50 feet. In the rural areas (outside of the URL) this setback shall be a minimum of 100 feet. The minimum riparian setback may be adjusted through a Minor Use Permit approval, but in no case shall structures be allowed closer than 10 feet from a stream bank.

- Section 23.07.176 (Terrestrial Habitat Protection) – Provides provisions intended to preserve and protect rare and endangered species of terrestrial plants and animals by preserving their habitats. Emphasis for protection is on the entire ecological community rather than only the identified plant or animal.

County of Santa Barbara Comprehensive Plan: Conservation Element. This element includes policies that address the conservation, development, and use of natural resources including water, forests, soils, rivers, and mineral deposits in Santa Barbara County. It provides policies to protect native habitats, such as chaparral and scrub, grasslands, and aquatic streams, on a community-level scale. 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 over railyards (e.g., SMVR-SB).

City of Pismo Beach General Plan: Conservation and Open Space Element: The COSE element provides 30 policies that are considered essential for the quality of life of Pismo Beach. These policies are established within categories that include but are not limited to butterfly habitat, coastal foothills, riparian habitat, and Pismo Creek.

4.3.3 Significance Criteria

The following significance criteria are based on the CEQA environmental checklist presented in Appendix G of the CEQA Statutes and Guidelines and are used to describe the potential impacts of the Proposed Project on biological resources that may occur in the Project Area. All direct, indirect, short-term, and long-term impacts associated with Proposed Project are assessed within this section. The Proposed Project would have a significant adverse environmental impact on biological resources if it would:

- Result in temporary or permanent disturbance to, or destruction of, terrestrial habitat (or its functional habitat value) that is recognized as biologically or economically significant in federal, state, or local policies, statutes, or regulations, result in a net loss in the functional

habitat value of an Environmentally Sensitive Habitat Area (ESHA), or result in the temporary or permanent loss or degradation of Essential Fish Habitat (EFH).

- Result in the loss or decline in the local population of a federal- or state-listed threatened, endangered, or candidate species, or loss or disturbance to federally designated critical habitat; result in the potential loss or decline in the local population of any other regulated, fully protected, candidate, sensitive or special-status species identified under federal, state, local, or regional plans, policies and regulations, or by CDFW and USFWS; or result in any "take" of an endangered, threatened, or candidate species, CDFW fully protected species, or other special-status species.
- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.
- Create an adverse effect on waters of the US defined under Section 404 of the Clean Water Act; waters of the State defined under Section 404 of the Clean Water and the Porter-Cologne Water Quality Control Act; jurisdictional features defined under Section 30233 of the Coastal Act; jurisdictional features defined under Section 1600 *et seq.* of the California Fish and Game Code; or other jurisdictional waters through direct removal, filling, hydrological interruption, or other means.
- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.

4.3.4 Environmental Impact Analysis and Mitigation

Direct impacts to biological resources are defined as those that result from a project and occur at the same time and place. Direct impacts can include the removal of vegetation, localized erosion and sedimentation during construction, and exposure to hazardous materials and fugitive dust. Indirect impacts are caused by a project but can occur later in time, are farther removed in distance, and are reasonably foreseeable and related to a project. Indirect impacts would include the long-term degradation of habitat from alterations to natural hydrology or the introduction of invasive weeds and wildlife.

Proposed Project activities that may result in direct and indirect impacts to terrestrial biological resources during Phase 1 include demolition of existing structures and infrastructure, excavation of the SE Borrow Site, expansion of the access road to the SE Borrow Site, removal of the Discharge Structure (extends into Phase 2), and demolition of the existing Firing Range. Phase 2 activities that directly or indirectly impact terrestrial biological resources include additional vegetation removal and grading (if required), demolition of remaining structures, and final site restoration.

Table 4.3-5 summarizes the potential direct and indirect impacts on biological resources that are present or could potentially occur in the Project area during Phase 1 and Phase 2 decom-

missioning activities. The summaries presented in Table 4.3.5 are based on the evaluations conducted under each of the impact evaluations below.

Table 4.3-5. General Summary of Potential Impacts to Biological Resources

Biological Resource	Direct Impact	Indirect Impact
Native vegetation communities and ESHAs	• Temporary removal • Increased erosion and sedimentation to adjacent vegetation • Exposure to hazardous materials and fugitive dust	• Degradation of habitat from the introduction and spread of noxious and invasive weeds • Long-term alterations to hydrology • Future changes to sensitive community status and protections
Special-Status Plants	• Temporary loss of habitat • Crushing, trampling, entrapment • Exposure to hazardous materials and fugitive dust	• Degradation of habitat from the introduction and spread of noxious and invasive weeds • Long-term alterations to hydrology • Future changes to regulatory status and protections
Common and special-status wildlife, nesting birds and raptors	• Temporary loss of habitat • Crushing, trampling, entrapment • Destruction of burrows, dens, roosting sites, and nests • Disruption to breeding behavior • Increased erosion and sedimentation • Exposure to hazardous materials and fugitive dust • Introduction of fungal disease (amphibians and bats)	• Degradation of habitat from the introduction and spread of noxious and invasive species • Long-term alterations to hydrology • Future changes to regulatory status and protections
Jurisdictional waters and wetlands	• Increased erosion and sedimentation • Transport of hazardous materials	• Degradation of habitat from the introduction and spread of noxious and invasive species • Long-term alterations to hydrology

Impact BIO-1: Result in permanent and temporary loss of native vegetation communities (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

During Phase 1, the majority of ground-disturbing activities would occur in previously developed areas at the DCPP site. However, direct impacts would occur from removal of native vegetation communities during excavation of the SE Borrow Site, expansion of and improvements to the access roads to the SE Borrow Site (Skyview Road and Ranch Road) and the scenic overlook (Skyview Road), removal of the Discharge Structure, demolition of the existing Firing Range, and

construction of a new decommissioning office building. Some of these communities, or portions of some of these communities meet the definition of ESHA (see Impact BIO-7). The majority of direct impacts from vegetation removal would be temporary as most areas would be restored to natural conditions; however, permanent impacts would occur from the expansion of the access road to the SE Borrow Site. This portion of Skyview Road/Ranch Road would be permanently expanded from 12 feet to approximately 20 feet by adding graded aggregate base/ crushed rock to each side. Road expansion activities would result in the permanent removal of approximately 0.45 acre of native and non-native vegetation. Additionally, the construction of the new decommissioning office building would result in the permanent removal of less than 10 square feet of coyote brush scrub vegetation (PG&E, 2023). Any permanent impacts would be offset through the revegetation and restoration of previously developed areas (see Figure 2-36). For example, the existing Firing Range, which has an area of approximately 3.17 acres, would be restored to correspond with adjacent communities of native and non-native vegetation. Table 4.3-6 summarizes the temporary and permanent impacts to vegetation communities and land cover types at the DCPP site. Figure 4.3-9 illustrates impacts to vegetation communities at the DCPP site within the limits of disturbance.

As part of the Proposed Project, PG&E has developed a Discharge Structure Demolition and Restoration Plan that would be implemented during revegetation and restoration of the terrestrial area associated with the removal of the Discharge Structure during Phases 1 and 2 (see Table 2-2). This plan includes requirements for topsoil salvage and replanting for the terrestrial portion of the Discharge Structure restoration area, which is primarily characterized as an ESHA and is dominated by coastal bluff scrub habitat.

Table 4.3-6. Impacts to Vegetation Communities at the DCPP Site

Vegetation and Land Cover Type	Temporary Impact (acres)	Permanent Impact (acres)
Coastal, Riparian, and Wetland Communities		
Arroyo Willow Thickets**	0.02	0.00
Hardstem and California Bulrush Marshes**	0.00	0.00
Artesian Springs / Freshwater Wetlands**	0.00	0.00
Upland Communities		
Wild Oats and Annual Brome Grasslands	7.83[1]	0.28
Needlegrass – Melic Grass Grassland	0.83	0.00
Coyote Brush Scrub**	2.41[2]	0.00[3]
Coastal Bluff Scrub*/**	0.14	0.00
California Sagebrush Scrub**	3.84	0.08
California Coffeeberry Scrub*	0.14	0.00
Bush Monkeyflower Scrub*/**	2.39	0.00
Chamise – Black Sage Chaparral	0.00	0.00
Buck Brush Chaparral	0.00	0.00

Table 4.3-6. Impacts to Vegetation Communities at the DCPP Site

Vegetation and Land Cover Type	Temporary Impact (acres)	Permanent Impact (acres)
Toyon Chaparral	0.08	0.00
Coast Live Oak Woodland and Forest**	0.19[4]	0.09[5]
Other Land Cover Types		
Ruderal / Disturbed	2.04	0.00
Developed	81.45	0.00
Total	**101.36**	**0.45**

* Designated as a CDFW Sensitive Natural Community

** Community or portion of community identified as an Environmentally Sensitive Habitat Area (ESHA) pursuant to Section 30107.5 of the Coastal Act and Section 23.07.170 of the San Luis Obispo County Code.

[1] Includes approximately 90 square feet (< 0.01 acre) of temporary impacts to wild oats and annual brome grassland from construction of a new decommissioning office building (PG&E, 2023).

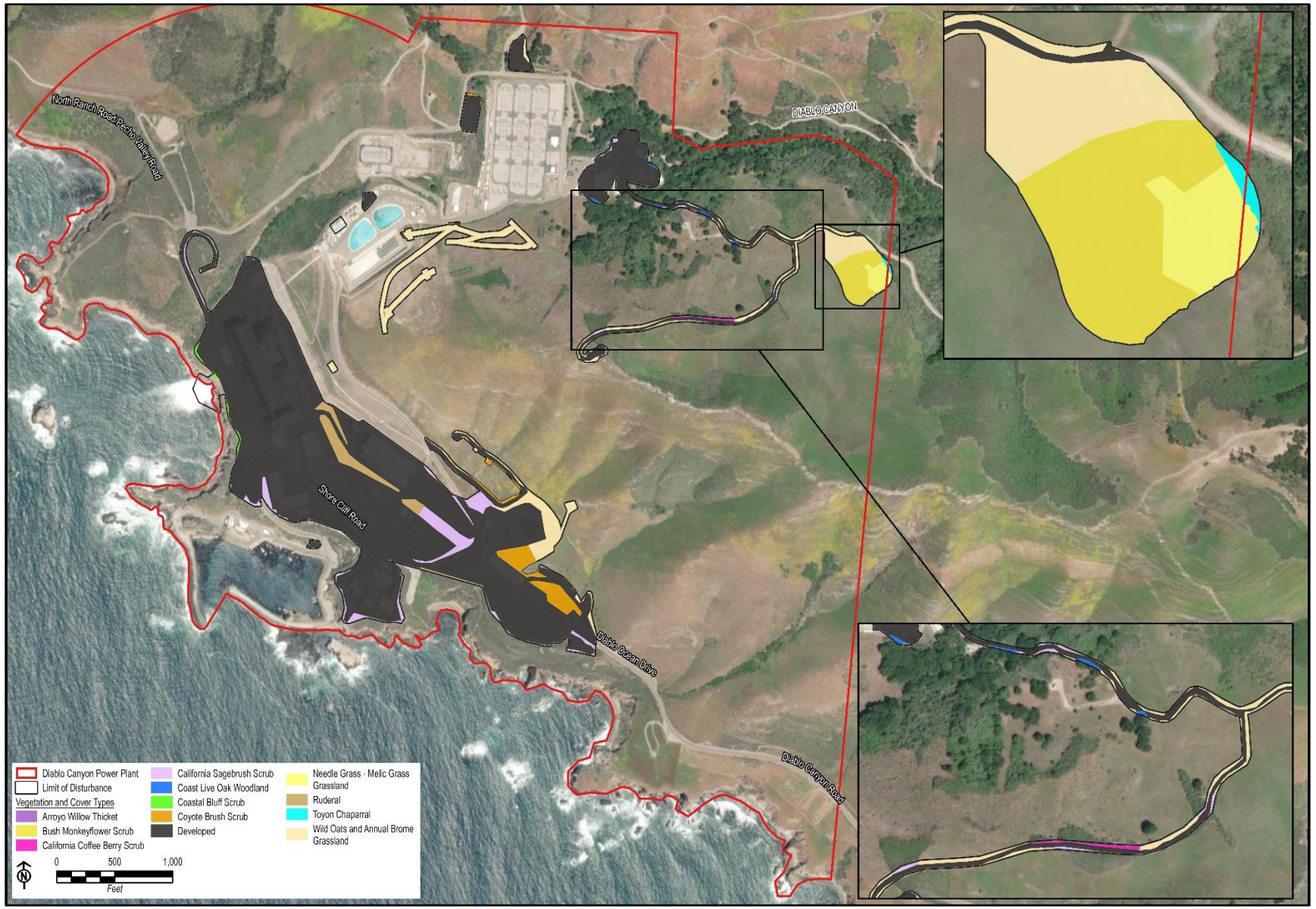
[2] Includes approximately 320 square feet (< 0.01 acre) of temporary impacts to coyote scrub brush from construction of a new decommissioning office building (PG&E, 2023).

[3] Includes negligible permanent impact to less than 10 square feet (< 0.01 acre) to coyote brush scrub from construction of a new decommissioning office building (PG&E, 2023).

[4] Does not account for temporary impacts that may result from upgrades to the existing septic system in the East Canyon Area or installation of new septic system, if required.

[5] Would be limited to impacts to understory vegetation as oaks and other mature trees would be left in place.

Figure 4.3-9. DCPP Impacts to Vegetation and Cover Types



Sources: Esri, 2022; Terra Verde, 2022.

Although tree removals are not anticipated, direct impacts would occur during tree trimming or grading within the critical root zone required for the expansion of the access road to the SE Borrow Site and construction of facilities in the revised Owner-Controlled Area. Impacts to oak trees could also occur during soil remediation to remove radiological and hazardous contamination as a result of implementing the Site Characterization Plan. Further, an existing septic and dispersal system, designed and implemented circa 1968 to serve facilities in the East Canyon Area, would be upgraded, or a new system would be established (see Section 2.3.3, *Project Description*). Ground-disturbing activities associated with upgrades to the existing system or installation of a new system could result in impacts to oak trees if oak trees are damaged or removed. While the County's Inland Title 22 Oak Woodland Ordinance (Section 22.58), which sets criteria for clear-cutting of oak trees outside of the Coastal Zone, does not apply to the Proposed Project; the County's COSE includes Policies BR3.1 and BR3.2, which require protection of native oaks in new development and mitigation through replacement for loss. Pursuant to the San Luis Obispo County Code Title 23 Coastal Zone Land Use Ordinance, no trees shall be removed without appropriate permits. PG&E would be required to comply with tree removal standards listed under Section 23.05.064 of the Coastal Zone Land Use Ordinance. These standards would be required as part of land use permits and would include tagging of trees to be removed and compliance with removal and replacement criteria if tree removals were to occur.

Direct impacts could also occur during vegetation removal associated with wildfire prevention (see Section 4.17, *Wildfire*). PG&E would comply with CAL FIRE's defensible space requirements for removal of brush and dead or dying vegetation and debris (PRC Section 4291 and California Code of Regulations Title 14, Section 1299.03 – see EIR Appendix C) as part of any grading or construction permits issued by the County. PG&E maintains an existing Fire Protection Program for the DCPP site in accordance with NRC regulations. This program transition to the DCPP Decommissioning Fire Protection Program to meet the NRC requirements of 10 CFR 50.48(f) for decommissioning sites, which would address fire prevention. Throughout decommissioning activities, PG&E would continue to manage vegetation in coordination with CAL FIRE/County Fire Department. The majority of any vegetation removal for fire prevention would occur along the access road to the SE Borrow Site. Vegetation along the access road is dominated by grasslands which would require minimal, if any, maintenance. Some portions of the access road to the SE Borrow Site traverse coast live oak woodlands. In compliance with the regulations mentioned above, PG&E would be required to remove dead or dying vegetation and debris from these areas which would not conflict with the County's Inland Title 22 Oak Woodland Ordinance (Section 22.58). Any brush removal required for fire prevention would be consistent with PG&E's Decommissioning Fire Protection Program.

Vegetation removal and grading would result in direct impacts to native vegetation if alterations to local soil conditions and existing hydrologic properties intensify the immediate frequency and magnitude of surface runoff and soil erosion. Even at small, discrete locations, the impact of microtopography on surface and runoff connectivity of the topsoil act as primary controls for the hydrological and erosional processes in broader environments (Mohr et al., 2013). Steeper slopes are particularly vulnerable to increased erosional effects during vegetation removal (Cram et al., 2007).

Vegetation may also be directly impacted from inadvertent spills of hazardous materials including petroleum products (e.g., paints, solvents, fuels), hydraulic leaks, and construction waste or leachate. Concrete-related waste can inadvertently contact vegetation through various means, such as drift, leaking, or spilling. Exposure to fugitive dust can result in direct impacts to individual plants and broader plant communities in habitats adjacent to work areas. Dust can have deleterious physiological effects and may affect plant productivity and nutritional qualities (Sharifi et al., 1997). Prolonged exposure may also affect natural plant processes such as photosynthesis, respiration, and transpiration, and allow the penetration of phytotoxic gaseous pollutants (Farmer, 1993). The potential for increased levels of fugitive dust would occur during demolition of developed areas and the removal of hardscape features. Additionally, excavation of the SE Borrow Site and soil remediation could produce excessive dust.

PG&E would implement several plans as part of the Proposed Project during Phase 1 activities to address habitat restoration, limit erosion, control sources of contaminants, and minimize fugitive dust (see Table 2-2, *Project Description*). These plans include a Discharge Structure Demolition and Restoration Plan. This plan addresses restoration of the terrace and topsoil associated with the void created by removal of the Discharge Structure. These plans also include a construction-specific Stormwater Pollution Prevention Plan (SWPPP) (Applicant Commitment [AC] BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*). The SWPPP would contain Best Management Practices (BMPs) designed to minimize erosion and control sediment during decommissioning activities. PG&E has also developed a Preliminary Erosion and Sediment Control Plan (PG&E, 2020b) that identified BMPs, such as perimeter controls (e.g., silt fencing and fiber rolls) and hydroseeding, to control erosion and sedimentation from the DCPP site during grading and restoration activities. The SWPPP would require additional site-specific BMPs to reduce or prevent the accidental release of hazardous materials and other pollutants. These would include designating areas for refueling or washing equipment, the use of secondary containment (i.e., drip pans), and requiring spill control kits be kept on-site. In addition to the SWPPP, the development and implementation of a Spill Prevention, Control, and Countermeasure (SPCC) Plan would be required by 40 CFR 112. The SPCC Plan would address countermeasures to contain, cleanup, and reduce the effects of an accidental release of oil and oil-based products. The Proposed Project also includes fugitive dust controls and identifies the areas of disturbance (AC AQ-1, *Minimize Fugitive Dust*, and AC AQ-5, S*LOAPCD Fugitive Dust Mitigation Measures*). As part of the Proposed Project, PG&E would delineate work limits and staging areas, identify disturbance areas, and conduct routine inspections of equipment for leaks (AC BIO-4, *Site Maintenance and General Operations*).

The introduction and spread of invasive or noxious weeds can result in widespread and long-term indirect impacts to native vegetation communities. Invasive or noxious weeds can outcompete and displace native plants, which may be of concern to coastal terraces and bluff communities. They can also invade riparian areas and change fire ecology. Weeds also directly affect habitat by altering soil chemistry, hydrological conditions, and pollinator population densities. Such impacts could be associated with the transport of weed seeds or plant parts on vehicles and equipment from outside areas into the Project area. The Proposed Project includes washing all vehicles and equipment prior to entering work areas and utilizing materials that are certified weed-free to limit the introduction and spread of noxious and invasive weeds (AC BIO-8, *Noxious Weed Prevention*). Indirect impacts could also occur if the upgraded or new septic system

associated with the East Canyon Area were to fail resulting in leaching of materials, such as nitrogen and potassium, that provide nutrients and promote soil conditions conducive to the spread of invasive and noxious weeds. For example, weeds are adapted to rapidly take up the nutrients that are released in organic matter and many germinate in response to the presence of nitrate which is used as a cue to indicate the absence of competition (Cornell University, 2018). However, because any upgrades would improve the existing system, which has been in use since circa 1968, the potential risk of failure would be substantially reduced relative to current conditions. Further, the installation of a new system would result in even a greater reduction of potential risks associated with failure of the system.

Due to the long-term nature of the Proposed Project, there is the potential that existing regulatory requirements may be modified, or new designations assigned to vegetation communities at the DCPP site. Indirect impacts could occur if vegetation communities present at the DCPP site receive new or additional protections that are not currently covered within the context of this analysis.

Impacts to native vegetation communities would be significant without mitigation. Implementation of MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), MM BIO-2 (*Prepare and Implement a Habitat Restoration and Revegetation Plan*), MM BIO-3 (*Implement Oak and Native Mature Tree Protection Measures*), MM BIO-4 (*Prepare and Implement Weed Management Plan*), MM BIO-5 (*Prepare and Implement a Biological Resources Adaptive Management Plan*), MM AQ-1 (*Implement a Decommissioning Activity Management Plan [DAMP]*), MM EM-2 (*Project Plan Updating, Tracking, and Reporting*, specifically for the Habitat Restoration and Revegetation Plan required under MM BIO-2, the Weed Management Plan required under MM BIO-4, the Biological Resources Adaptive Management Plan required under MM BIO-5, the DAMP required under MM AQ-1, and Drainage Plans required under MM HWQ-1), and MM HWQ-1 (*Prepare and Implement Drainage Plans*) would ensure that impacts are reduced to less than significant (Class II).

These mitigation measures include the implementation of a Dust Control Plan and a Construction Drainage Plan, a County-approved worker training program, site stabilization and restoration, native tree protections, weed control, and tracking and enforcement of plans developed as part of the Proposed Project during Phase 1 activities at the DCPP site. These measures also account for the protection of resources potentially subject to future and unforeseen regulations associated with sensitive vegetation communities.

Railyards

Pismo Beach Railyard. Although primarily developed, the PBR site supports patches of native vegetation communities, including oak woodlands, scrub habitat, and wetland features. Vegetation removal and grading activities would not be required as part of modifications at the PBR site and direct impacts from vegetation removal would not occur. The majority of the PBR site is covered by impervious surfaces and this would not change during decommissioning activities. Therefore, erosion, sedimentation, and dust control would continue to be managed as it is under existing conditions and impacts to native vegetation communities would not occur. Activities at the PBR site would involve vehicles and equipment that utilize hazardous materials (e.g., motor oil, diesel fuel, hydraulic fluid) that could directly impact adjacent vegetation communities if

accidentally released or improperly contained. Native vegetation within and adjacent to the PBR site would be indirectly impacted if these communities are displaced or their habitat is degraded from the introduction and spread of invasive weeds during modifications and use of the PBR site. However, since modifications and use would be primarily conducted within developed portions of the PBR site, impacts to native vegetation communities at the PBR site would be less than significant and no additional mitigation is required (Class III).

SMVR-SB. The SMVR-SB site is mostly developed. However, this site supports patches of native scrub communities along with a dense eucalyptus grove within the eastern portion of the site. Vegetation removal and grading activities would not be required as part of modifications at the SMVR-SB site and direct impacts from vegetation removal would not occur. The railyard operator would make any improvements needed to the rail lines or facility. Although grading activities would not occur, soil disturbance from the installation of a new rail spur and road base could result in increased levels of erosion and sedimentation. Native vegetation communities within and adjacent to the SMVR-SB site would be directly impacted if exposed to excess sediment that is transported off-site. In compliance with State guidelines, the railyard operator would implement stormwater management measures at the SMVR-SB site if ground disturbance is greater than one acre. Direct impacts from the exposure of hazardous materials to native vegetation would be similar to those discussed for the PBR site. Improvements at the railyard could result in surface disturbance that generates fugitive dust. Direct impacts would occur if native vegetation within and adjacent to the SMVR-SB site is exposed to excessive levels of fugitive dust. Indirect impacts would include the introduction and spread of noxious and invasive weeds. However, since modifications and use would be primarily conducted within developed portions of the SMVR-SB site, impacts to native vegetation communities would be less than significant and no mitigation is required (Class III).

Phase 2

Direct impacts from vegetation removal during Phase 2 would be similar but substantially reduced in magnitude to those discussed for Phase 1 (see Phase 1 discussion). During Phase 2, grading/fill activities would primarily focus on backfilling voids created by the demolition of DCPP structures and restoring the DCPP site to a natural condition that promotes positive drainage. The process of removing the Discharge Structure and completing associated restoration would continue in Phase 2 (see Phase 1 discussion). In addition, a new blufftop road segment would be constructed to connect Shore Cliff Road with the North Ranch Road/Pecho Valley Road. All of these features would be located within previously developed areas.

Those disturbed areas not retained would be reclaimed through scarifying, regrading, and revegetating. If any clearing of previously undisturbed areas is required, topsoil would be removed and stockpiled. During Phase 2, PG&E would also prepare a Revegetation Plan as part of the Proposed Project (see Section 2.4.4, *Grading and Landscaping [Final Site Restoration]*) that would apply to all temporary disturbance areas and the demolition zone. Upon completion of grading to natural contours, areas would be revegetated to establish native vegetation that is consistent with adjacent plant communities and wildlife habitat. Seed mixes would be developed that have species mixes similar to adjacent reference areas. No oak trees would be removed for the temporary expansion of the access road to the SE Borrow Site. In areas where

oak trees are located, the width of disturbance would be reduced as needed to avoid removal of the trees. PG&E would continue to remove brush and dead/dying trees consistent with CAL FIRE's defensible space requirements during Phase 2 (see Phase 1 discussion).

The potential for increased erosion and fugitive dust would likely increase during Phase 2 activities as the majority of hardscape features at the DCPP site would be removed resulting in a greater level of exposed soils. The use of vehicles and equipment would continue to result in the potential for the accidental release or improper containment of hazardous materials. PG&E would minimize erosion, fugitive dust, and release of hazardous materials, during Phase 2, as described in the Project Description (AC AQ-1, *Minimize Fugitive Dust*; AC BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*; and AC BIO-4, *Site Maintenance and General Operations*).

Ongoing grading activities would result in indirect impacts if natural hydrology of the site is altered in such a way as to adversely affect adjacent vegetation communities due to increased long-term erosion and sedimentation, altered on-site drainage patterns, or additional runoff that would exceed capacity of stormwater conveyance. As part of the Proposed Project's site restoration and pursuant to Section 23.05.042 (Drainage Plan Required) of the San Luis Obispo County Code, a Stormwater Management Plan (SWMP) would be prepared prior to the issuance of any grading or building permits (see Section 2.4.5, *Long-Term Stormwater Management*). The SWMP would implement management of stormwater drainage from the site over the period of time required for revegetation to establish and to minimize potential sediment impacts from the site to Diablo Creek and the Pacific Ocean. The level of exposed soils occurring at the DCPP site during Phase 2 would increase the potential for indirect impacts from the introduction and spread of noxious and invasive weeds. Indirect impacts associated with potential changes to existing regulatory requirements or new designations for sensitive vegetation communities would be similar to those discussed for the DCPP site under Phase 1.

Impacts to native vegetation communities would be significant without mitigation. Therefore, the same mitigation measures listed for Phase 1 activities at the DCPP site would be required. Additionally, MM HWQ-1 (*Prepare and Implement Drainage Plans*), which requires the preparation and implementation of a Post-Decommissioning Drainage Plan prior to initiating Phase 2 activities and MM HWQ-2 *(Long-Term Erosion and Sediment Control Plan*), which would identify BMPs to control erosion and sedimentation from the site during grading and final site restoration activities, would be required. Plans developed as part of the Proposed Project would be tracked and enforced by MM EM-2 (*Project Plan Updating, Tracking, and Reporting*, specifically for the Drainage Plans required under MM HWQ-1 and the Long-Term Erosion and Sediment Control Plan required under MM HWQ-2). The implementation of these mitigation measures would ensure that impacts are reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. These activities would be conducted within fully developed and fenced areas. In compliance with CAL FIRE's defensible space requirements, post-decommissioning activities would also include periodic removal of brush and dead/dying trees. These activities would be minimal and would only be performed to maintain compliance

with CAL FIRE and County regulations. Therefore, impacts would be less than significant, and no mitigation is required.

Future Actions. Upon the NRC's release of the Part 50 license, the Marina would be made available to a third-party for permitting and reuse for recreational, education, or commercial purposes and controlled access from the Avila Gate Guard House Facilities would no longer be implemented. Operations could include boating activities and use of the ancillary structures, parking lots, and public restroom facility. For analysis purposes, it is assumed that up to 200 persons could visit the Marina per day. Any third-party use of the Marina would be restricted to developed facilities within the Marina. However, since access to the facilities would be uncontrolled, direct impacts could occur if vegetation communities are damaged or loss as a result of public use outside of the developed areas. Impacts to native vegetation communities would be significant without mitigation. Therefore, MM BIO-6 (*Install "No Entry" Signage at DCPP*), which includes restrictions for entering unauthorized areas during future actions, would ensure that impacts are reduced to less than significant (Class II).

Mitigation Measures for Impact BIO-1.

AQ-1 **Implement a Decommissioning Activity Management Plan (DAMP).** See Section 4.2.

BIO-1 **Prepare and Implement a Worker Environmental Awareness Program (WEAP).** Prior to and for the duration of any ground disturbance, the Applicant or its designee shall provide Worker Environmental Awareness Program (WEAP) training to all new personnel prior to beginning work at the DCPP, PBR, and SMVR-SB sites. The training may be presented in the form of a video.

The training program shall be developed by the Lead Biologist (MM BIO-9) to educate Project personnel about the Project's sensitive biological resources. A draft of the training program (i.e., video and written materials) shall be provided to the County of San Luis Obispo Planning and Building Department (County) for review and approval no fewer than 135 days prior to issuance of construction permits for any ground disturbance at the DCPP, PBR, or SMVR-SB sites. The training may be conducted concurrent with other environmental training (e.g., cultural resources awareness training, safety training, etc.).

The WEAP training shall include, at a minimum:

- An overview of the sensitive biological resources that are known or have the potential to occur in the Project area and surrounding habitat. This shall include nesting birds, special-status plants and wildlife, and sensitive habitats.
- An overview of the Project, Mitigation Monitoring and Reporting Program (MMRP), and regulatory permit conditions and the consequences of non-compliance with these requirements.
- An overview of the federal and State Endangered Species Acts, Migratory Bird Treaty Act, Bald and Golden Eagle Protection Act, pertinent Fish and Game Code sections, and other applicable regulatory requirements and the consequences of non-compliance with these requirements.

- Functions, responsibilities, and authority of biological monitors and how they interact with Project personnel.
- Identify clear points of contact for biological monitors and construction personnel including who to contact should workers have questions regarding compliance with environmental documents and permit conditions.
- Project restrictions, such as Environmentally Sensitive Habitat Areas (ESHAs), required setbacks from sensitive biological resources, and avoidance buffers.
- Requirements to remain within authorized work areas and on approved access routes, with examples of flagging and signage used to designate these areas.
- Information on compliance with Project speed limits, control of litter and micro trash, smoking restrictions, wildfire minimization measures, spill containment and clean up, and the implementation of Best Management Practices.
- Measures to reduce the potential to introduce or spread invasive weeds into the Project area, descriptions of the Project's weed control methods, and compliance requirements for Project personnel.
- Identify limitations for refueling near aquatic features or where spills may enter State or federal waters.
- Explanation that wildlife must not be harmed or harassed including procedures for abiding by Project speed limits, covering pipes, securing excavations, and installing exit ramps to prevent wildlife entrapment.

Training acknowledgement forms shall be signed by each person attesting that they understand and will abide by Project requirements. The Applicant or its designee shall provide the County, within a Monthly Compliance Report, the WEAP training acknowledgement forms for persons who have completed the training in the prior month and a running total of all persons who have completed the training to date. A hardhat sticker that can be easily verified in the field will be distributed by the Applicant or its designee to indicate participation in the WEAP training.

WEAP – Abbreviated Version. An abbreviated version of the WEAP training shall be presented to individuals who are exclusively delivery drivers, truck drivers, or visitors to the Project area. The Abbreviated Version will be administered by a qualified Project biologist prior to those individuals entering or working on any Phase 1 or Phase 2 activities.

Abbreviated WEAP training will provide sufficient information for the individual to understand and maintain compliance with the MMRP and permit conditions. The abbreviated WEAP presentations will be tailored to the situation and emphasize Project requirements that are relevant to that situation (e.g., speed limits, staying within work limits, use of designated wash areas, etc.).

A training acknowledgement log will be signed by each participant identifying that they understand and will abide by Project compliance conditions. A hardhat sticker that can be easily verified in the field will be distributed by the Applicant or its

designee to indicate participation in the Abbreviated WEAP training. This log will be provided in a Monthly Compliance Report to the County.

Short-term visitors (total of 5 days or less per year) to the Project area who will be accompanied by WEAP-trained Project personnel for the entire duration of their visit(s) are not required to attend WEAP or abbreviated WEAP training.

BIO-2 **Prepare and Implement a Habitat Restoration and Revegetation Plan.** Prior to the submission of any building or construction permit applications, the Applicant or its designee shall prepare a Habitat Restoration and Revegetation Plan (HRRP) that addresses restoration and revegetation related to all areas that are being temporarily disturbed during Phase 1 and Phase 2 activities. It shall also address final site restoration and long-term restoration and revegetation monitoring required after decommissioning activities are completed.

The HRRP shall consist of two separate and distinct components (Part 1 and Part 2) that address restoration and revegetation during Phase 1 and Phase 2 of the Project, respectively. At a minimum, the HRRP shall provide a statement of goals and objectives for each component based on Project schedule, location, and areas to be stabilized and vegetation types to be restored and/or revegetated during that phase of the Project.

At least 30 days prior to implementation of each component of the HRRP, the Applicant or its designee shall submit the resume of a Qualified Ecologist/Restoration Biologist, knowledgeable in habitat restoration, to the County of San Luis Obispo Planning and Building Department (County) for review and approval. The Qualified Ecologist/Restoration Biologist will be responsible for monitoring implementation of the HRRP component as well as the progress on achieving the established success criteria (see below).

Additionally, the HRRP shall include the following:

Part 1 - Phase 1 site stabilization and weed control.

Prior to the submission of applications for any County Grading/Construction Permits and removal of any vegetation at the DCPP site associated with Phase 1, the Applicant or its designee shall submit Part 1 of the HRRP to the County, and to California Department of Fish and Wildlife (CDFW) and US Fish and Wildlife Service (USFWS), for joint-agency review and comment. The Applicant or its designee shall incorporate all requested revisions in coordination with the County for final approval of Part 1 of the HRRP within 12 months from the start of Phase 1 decommissioning activities.

The goals and objectives for this component shall ensure that temporarily disturbed areas are stabilized to minimize erosion, offsite sedimentation, fugitive dust, and minimize the potential for the introduction and spread of noxious and invasive weeds during Phase 1 activities. Phase 1 restoration activities shall be consistent with the requirements of the Weed Management Plan (see MM BIO-4). This component shall apply to all temporary disturbance areas and demolition zones that are not retained

at the DCPP site during Phase 1 activities. At a minimum, Phase 1 restoration activities shall include the following components:

a. Description of initial site preparation (grading or re-contouring).

b. Pre-installation weeding for target weeds (see MM BIO-4).

c. Description of the hydroseeding, broadcast seeding, and container planting.

d. Irrigation, weeding, and routine maintenance and monitoring.

e. Use of a native seed mix that contains grasses, annual wildflowers, forbes, and perennial shrubs for all areas not stabilized by other methods that prevent the recruitment of native or non-native vegetation.

Success criteria must meet the following:

- At least 50 percent of the vegetation cover within the Phase 1 restoration areas shall be native species that naturally occur in local native habitats.
- Non-native cover for areas proposed for future re-use or development may include grasses and non-native species that are not considered noxious or invasive (see MM BIO-4).
- Absolute cover of native plant species within the Phase 1 restoration areas shall equal at least 50 percent total cover within 2 years of seeding and 75 percent total cover within 5 years of seeding.

Part 2 - Phase 2 final site restoration and revegetation.

Prior to the submission of applications for any County Grading/Construction Permits (e.g., Intake Structure Closure, grading permit for the Firing Range, grading permit for final soil remediation, etc.) associated with Phase 2, and before NRC Part 50 License Termination, the Applicant or its designee shall submit Part 2 of the HRRP to the County, and to CDFW and USFWS, for joint-agency review and comment. Timing of this submittal may be adjusted upon mutual agreement between the Applicant or its designee and the County. The Applicant or its designee shall incorporate all requested revisions in coordination with the County for final approval of Part 2 of the HRRP within 12 months from the start of Phase 2 decommissioning activities.

The Part 2 component shall be applicable to all temporary disturbance areas outside of the revised Owner Controlled Area and Marina facilities. For all temporary disturbance areas, the HRRP shall include objectives and quantifiable success criteria commensurate with the goals for each site. Part 2 shall include the following elements for final site restoration and revegetation of all temporary disturbance areas:

a. A statement of final restoration and revegetation goals and objectives for each temporary disturbance area, based on vegetation type and jurisdictional status of each area.

b. Quantitative success criteria for each restoration and revegetation area or category.

c. Implementation details, including but not limited to, topsoil stockpiling and handling; post-construction site preparation; soil decompaction and recontouring; planting and seeding palettes to include only native, locally sourced materials with confirmed availability from suppliers; and schedules.

d. Maintenance, including but not limited to, irrigation or hand-watering schedule and equipment, erosion control, and weed control consistent with the Weed Management Plan (see MM BIO-4).

e. Specify monitoring schedule and data collection methods throughout the establishment of vegetation with key indicators of successful or unsuccessful progress and quantitative values to objectively determine success or failure at the conclusion of the monitoring period.

Success criteria must meet the following for annual or perennial grass seeded areas:

- Year 1: Greater or equal to 40 percent total cover.
- Year 2: Greater or equal to 50 percent total cover.
- Year 3: Greater or equal to 60 percent total cover.
- Year 4: Greater or equal to 70 percent total cover.
- Year 5: Greater or equal to 80 percent total cover.

Success criteria must meet the following for perennial shrub seeded areas:

- Year 1: Greater or equal to 10 percent total cover.
- Year 2: Greater or equal to 20 percent total cover.
- Year 3: Greater or equal to 35 percent total cover.
- Year 4: Greater or equal to 50 percent total cover.
- Year 5: Greater or equal to 60 percent total cover.

Nonnative species percent cover cannot exceed 20 percent total cover in areas outside of ESHAs and 10 percent total cover within ESHAs, or as determined based on existing conditions with the approval of the County.

All revegetated sites shall have persisted successfully without irrigation or remedial planting for a minimum of 2 years prior to the completion of monitoring.

***Weed Control*.** The Weed Management Plan (see MM BIO-4) shall be implemented throughout implementation of Part 1 and Part 2 of the HRRP. For all restoration and revegetation areas, only seed or potted nursery stock of locally occurring native species from a local source will be used. The list of plants observed during botanical surveys for the Project will be used as a guide to site-specific plant selection. Seeding and planting will be conducted as described in Chapter 5 of *Rehabilitation of Disturbed Lands in California* (Newton and Claassen, 2003).

***Timing*.** For all revegetation or restoration areas, the HRRP shall include objectives and quantifiable success criteria commensurate with the goals for each site. Monitoring of the revegetation and restoration sites will continue annually for no fewer than 5 years upon completion of Phase 2 final site restoration activities or until

the defined success criteria are achieved, whichever is later. The Applicant or its designee shall be responsible for implementing remediation measures as needed.

Reporting. For all revegetation and restoration areas, the Applicant or its designee shall provide annual reports to the County verifying acreage subject to temporary disturbance, identifying which items of the HRRP have been completed, and which items are still outstanding. The annual reports will also include pertinent maps of areas subject to restoration and revegetation, a summary of the revegetation and restoration activities for the year, a discussion of whether performance standards were met, any remedial actions conducted or recommendations for remedial actions, if warranted, that are planned for the upcoming year. Each annual report shall be submitted to the County within 90 days after completion of each year of revegetation and restoration work.

BIO-3 **Implement Oak and Native Mature Tree Protection Measures.** Prior to the submission of applications for any County Grading/Construction Permits, the Applicant or its designee shall identify any native mature trees or oak trees subject to Section 23.05.062 (Tree Removal Permit Required) of the County Coastal Zone Land Use Ordinance. Protected trees in Coastal areas are defined as oaks or other native trees with a trunk diameter of 8-inches or more at 4 feet above grade (also referred to as "diameter at breast height" or "DBH"). Coastal trees are required to be protected with a buffer of 100 feet from any development impacts and be mapped and identified on construction plans.

In non-Coastal ("Inland") area, oak tree protection is established through the County's Conservation and Open Space Element Policies 3.1 and 3.2 and pursuant to SB1332, which requires any oak tree with a trunk diameter of 5-inches or greater diameter at breast height (DBH), located within 50 feet of all discretionary Project work areas, to be avoided, protected, or mitigated. Oak trees located within 50 feet of any proposed construction activity are to be mapped and identified on construction plans.

3.1. *Prior to start of any site-disturbing activities or County permit issuance related to Decommissioning:* Prepare and submit for County review and approval an Oak and Native Tree Mitigation Plan, which incorporates and updates the existing Oak Tree Inventory and Mitigation Plan to include all native mature trees and oak trees that may be impacted or removed. The plan shall be prepared by a certified Arborist or other County-approved Tree Care Expert (i.e., Biologist/Botanist, Nursery Specialist). The Oak and Native Tree Mitigation Plan shall define the tree protection and mitigation requirements for protected trees proposed to be removed or that may be impacted. The Plan shall indicate the standards for Coastal and Inland tree protection and shall require construction plans to identify which standards apply to trees on the plans. Any tree that is removed (or impacted to the point of removal) requires replacement at a minimum 4:1 ratio. Any tree impacted as described below shall be replaced as described below.

a. Impacted trees shall be evaluated as follows: Any oak tree with a DBH of 12 inches or less that has lost 25 percent or more of its living canopy, any oak tree with a DBH of 24 inches or less that has lost 15 percent of its living canopy, and any oak tree greater than 24 inches DBH that has lost more than 5 percent of their living canopy; or, the removal of more than 3 structural roots greater than or equal to 2 inches (or 1/3 of their root zone) shall be considered lost and require full replacement mitigation at a ratio of 4:1.

b. The Oak and Native Tree Mitigation Plan shall describe the method(s) proposed for mitigation, as follows:

    i. Replacement On Site: If on-site replacement is proposed, the Plan shall indicate preliminary tree replacement planting locations, and describe the sourcing, size and planting methodology for in-kind replacement trees.

    ii. Replacement Off-site: If off-site replanting is proposed, the Oak and Native Tree Mitigation Plan shall include a preliminary contract or other evidence of availability and terms of the replanting site.

    iii. Fee Payment for Mitigation: mitigation by fee payment at the rate of $970 per tree removed, or $485 per tree impacted, may be authorized by County Planning through the County's oak mitigation fee payment program to the California Wildlife Conservation Board. The fee is paid to County Planning prior to Final/Occupancy on any grading or construction permit subject to oak mitigation requirements, following applicant submittal of a summary of oak impacts and mitigation fee total, and County receipt of acknowledgement via letter from the Wildlife Conservation Board to accept said funds.

    iv. Replacement trees shall be monitored for a period of seven years or until success criteria are met, with annual reports submitted to the County. The Plan shall specify monitoring frequency, success criteria, remediation for losses, and reporting format.

3.2. *Prior to the start of any site-disturbing activities or issuance of a County permit related to Decommissioning:* The following avoidance and protection measures shall be implemented where Project activities are proposed to be conducted within 100 feet of any protected tree (≥ 8-inch DBH) in the Coastal Zone, and within 50 feet of any oak tree (≥ 5-inch DBH) located in the Inland areas of the site.

a. Prior to issuance of a construction permit in any area where protected trees located within prescribed buffers for Coastal and Inland protection may be impacted or removed by development: the Applicant or their designee shall prepare and submit a tree evaluation, prepared by a certified Arborist or other County-approved Tree Care Expert (i.e., Biologist/Botanist, Nursery Specialist), that: (1) evaluates the size and health of all trees within the work area or outside limits of work within specified buffers; (2) evaluates the potential for impacts; and (3) identifies trees that are proposed or likely to be. The evaluation shall

include an estimate of in-kind mitigation tree replacement needed for that permit, using 4:1 for trees removed and 2:1 for trees impacted.

b. The canopy edge and trunk location of any protected tree located within 100 feet (Coastal Zone, all native trees) or 50 feet (Inland, oaks only) of the limits of any proposed vegetation removal, tree trimming, vehicle compaction, grading, road improvements, or other ground-disturbing activities shall be surveyed by a Licensed Land Surveyor or other qualified individual and presented on all Project construction plans. The County's Coastal Zone boundary and required tree protection buffers shall be incorporated into all Project construction plans.

c. Construction drawings for permits shall include an Oak and Native Tree Inventory and a location plan that clearly delineates all oaks and native trees within 50 feet (Inland) or 100 feet (Coastal) of the limits of proposed site disturbance. Plans shall indicate which trees are to be: (1) removed, (2) protected but impacted, or (3) protected and avoided. Trees shown on grading and/or construction plans shall be identified by species and trunk diameter at breast height. Plans shall identify the name and contact information of the Project Arborist or Tree Care Specialist responsible for monitoring.

d. Prior to initiating any vegetation removal, tree trimming, grading, trenching, road improvements, or other ground-disturbing activities, tree protection fencing shall be installed at or beyond the outer limits of the sensitive root zone (defined as 1.5 times the canopy diameter) to protect trees to be preserved. Where grading or trenching will encroach into the root zone, the fencing shall be at edge of disturbance, and encroachment into root zone shall be documented and mitigated. No ground-disturbing activities shall be permitted within the protective fencing areas without the approval of the County of San Luis Obispo Planning and Building Department. The fencing shall be maintained and kept intact throughout the duration of Phase 1 and Phase 2 decommissioning activities or as otherwise determined by the County through the permitting process for specific areas.

e. During Construction impacts to the canopy or sensitive root zone of protected trees shall be avoided to the maximum extent feasible. Impacts include, but are not limited to, trimming, pruning, thinning, road grading, trenching, vehicle compaction, installation of impervious surfaces (e.g., asphalt, road base), or installation of new irrigation systems or other supplemental water sources within the sensitive root zone. Any roots exposed during Phase 1 and Phase 2 ground disturbance shall be treated by the Project Arborist (or approved Tree Care Specialist) and covered with a layer of soil to match existing topography.

f. Within 60 days of completing grading/construction activity and tree trimming or removal as authorized under any County grading or construction permit, the Project Arborist shall submit a report to the County of resulting tree impacts and mitigation requirements for that permit. The total summary of tree impacts and mitigation (replacement on-site, off-site or fee payment) shall be tracked as a running total for the DCPP site thorough Phase 1 and Phase 2.

g. Upon completion of Phase 1 construction activities, and prior to Initiation of Phase 2, the Project Arborist (or approved Tree Care Specialist) shall prepare a Phase 1 implementation summary of the Oak and Native Tree Mitigation Plan and submit to the County Planning and Building Department. The report shall include a summary of tree replacement / mitigation required and implemented to date. A Phase 2 Tree Protection update based on Phase 2 activity shall be prepared and provided to the County at the same time, to be approved prior to issuance of permits for Phase 2. At the completion of grading for Phase 2, and prior to final Site Restoration, a final Tree Protection Summary and mitigation status shall be provided. Monitoring of replacement trees shall be conducted for up to 7 years.

BIO-4 **Prepare and Implement a Weed Management Plan.** Prior to the submission of applications for any County Grading/Construction Permit related to Decommissioning, the Applicant or its designee shall prepare and implement a Weed Management Plan (WMP) describing the proposed methods of preventing and controlling Project-related spread of weeds or new weed infestations. The Draft WMP shall be submitted to the County of San Luis Obispo Planning and Building Department (County) for review and approval at least 60 days prior to Phase 1 activities at the DCPP site. No Project activities shall proceed until the WMP is approved.

For the purpose of the WMP, "weeds" shall include designated noxious weeds, as well as any other non-native weeds or pest plants identified on the weed lists of the California Department of Food and Agriculture or the California Invasive Plant Council (CAL-IPC). The WMP shall be implemented throughout all Phase 1 and Phase 2 decommissioning activities at the DCPP site and shall include the following components:

Background. An assessment of the Project's potential to cause the spread of noxious and invasive weeds into new areas, or to introduce new weeds into the Project area. This section must list known and potential noxious and invasive weeds occurring in the Project area and in the general region and identify threat rankings and potential consequences of Project-related occurrence or spread for each species. This assessment shall include, but is not limited to, weeds that (1) are rated high or moderate for negative ecological impact in the CAL-IPC Inventory Database (CAL-IPC, 2022b), and (2) aid and promote the spread of wildfires. This section shall identify control goals for each species (e.g., eradication, suppression, or containment) likely to be found within the Project area.

Preconstruction weed inventory. The Applicant or its designee shall inventory all areas subject to Project-related vegetation removal or ground-disturbance. The weed inventory shall include vehicle and equipment access routes within the DCPP site and staging and storage yards. Weed occurrences shall be mapped and described according to density and area covered. The map shall be updated at least once a year.

Prevention. The WMP shall specify methods to minimize potential transport of weed seeds within the DCPP site and from areas outside of the DCPP site. The WMP shall specify inspection procedures for equipment and materials entering the Project area.

Vehicles and equipment shall be inspected and cleaned prior to entering specified points in the Project area and before leaving the DCPP site where weed occurrences must be locally contained. Heavy equipment (e.g., graders, bulldozers, cranes, etc.) shall be cleaned of dirt and mud that could contain weed seeds, roots, or rhizomes. Equipment shall be inspected to ensure it is free of any dirt or mud that could contain weed sources. Tires, tracks, outriggers, and undercarriages shall be carefully washed. Vehicles (e.g., pick-up trucks) that frequently entering and exiting Project work sites shall be inspected and washed on an as-needed basis. Tools, such as chainsaws, hand clippers, pruners, etc. shall be cleaned of dirt and mud before entering Project work sites. All equipment, vehicles, and tools shall be washed off-site when possible. If off-site washing is infeasible, on-site cleaning stations shall be set up at specified locations to clean equipment, vehicles, and tools before entering unpaved work sites. Wash stations are to be located a minimum of 100 feet from sensitive habitats, including ESHAs and jurisdictional features (e.g., Diablo Creek, wetland habitats, or drains that convey flow to these areas). Wastewater from cleaning stations shall not be allowed to run off the cleaning station site. When equipment and vehicles are washed on-site, a daily log must be kept stating the location, date and time, type of equipment, methods used, and personnel present. The log shall contain the signature of the responsible personnel. Written or electronic logs shall be available to the County upon request.

Erosion control materials (e.g., fiber rolls or hay bales) must be certified free of weed seed before entering the Project area. The WMP must prohibit on-site storage or disposal of mulch or green waste that may contain weed material. Mulch or green waste that could contain weed material shall be removed from the site in a covered vehicle to prevent seed dispersal and transported to a licensed landfill or composting facility. The WMP shall specify guidelines for any soil, gravel, mulch, or fill material to be imported into the DCPP site or transported to an off-site location.

Monitoring. The WMP shall specify methods of survey for weeds throughout Phase 1 and Phase 2 decommissioning activities at the DCPP site. It shall also specify qualifications of botanists responsible for weed identification and monitoring. The WMP shall include a monitoring schedule to ensure timely detection and immediate control of weed infestations to prevent further spread. Surveying and monitoring for weed infestations shall occur at least two times per year throughout Phase 1 and Phase 2 activities at the DCPP site and shall coincide with the detection periods for early and late season weeds. The WMP shall also include methods for marking weed locations and recording and communicating these locations to applicable personnel. The map of weed locations (discussed above) shall be updated at least once a year.

Control. The WMP shall specify manual and chemical weed control methods to be employed. The WMP shall include only weed control measures with a demonstrated record of success for target weeds, based on the most recent information available. The plan shall describe proposed methods for promptly scheduling and implementing control activity when any weed infestation is located, to ensure effective and timely weed control. Weed infestations must be controlled or eradicated as soon

as possible upon discovery, and before they go to seed, to prevent further spread. All proposed weed control methods must minimize the extent of any disturbance to native vegetation, limit ingress and egress to defined work areas and access routes and avoid damage from herbicide use or other control methods to any environmentally sensitive resources in or adjacent to the DCPP site.

Any new weed infestations shall be treated at a minimum of at least once annually until eradication, suppression, or containment goals are met. For eradication, when no new seedlings or resprouts are observed for 3 consecutive, normal rainfall years, or 5 consecutive years regardless of rainfall, the weed occurrence can be considered eradicated and weed control efforts may cease.

Manual control shall specify well-timed removal of weeds or their seed heads with hand tools. Seed heads and plants shall be disposed of in accordance with the most recent guidelines from the County of San Luis Obispo Department of Agriculture/ Weights and Measures.

The chemical control section of the WMP shall include specific and detailed plans for any herbicide use. It must indicate where herbicides will be used, which herbicides will be used, and specify techniques to be used to avoid drift or residual toxicity to native and special-status vegetation consistent with any San Luis Obispo County Department of Agriculture/Weights and Measures guidelines. All herbicide applications shall follow US Environmental Protection Agency label instructions and be completed in accordance with federal, state, and local laws and regulations. Herbicide treatment shall only be implemented by a Licensed Qualified Applicator with the appropriate County permits. Herbicides shall not be applied during or within 72 hours of predicted rain or when wind velocities exceed 6 miles per hour. Only water-safe herbicides shall be used within 100 feet of channels (whether engineered or not) or Diablo Creek or other riparian or wetland features at the DCPP site.

Reporting. The WMP shall specify County-approved report contents and schedule requirements.

BIO-5 **Prepare and Implement a Biological Resources Adaptive Management Plan.** The Applicant or its designee shall prepare and implement a Biological Resources Adaptive Management Plan. The Plan shall provide a discussion of baseline biological conditions including sensitive vegetation communities and special-status species that have been recorded or could potentially occur at the DCPP site along with an overview of existing and relevant mitigation measures prepared for the Project. The Plan shall also provide direction to maintain compliance with existing mitigation measures and federal, state, and local laws and regulations should CDFW, USFWS, and/or National Marine Fisheries Service (NMFS) status designations for sensitive vegetation communities and special-status species change over the duration of the Project. The Plan shall be submitted to the County of San Luis Obispo Planning and Building Department (County) within 3 years of initial ground disturbance at the DCPP site for review and approval. At a minimum, the Plan shall include the following conditions which shall be conducted every 5 years following initial ground distur-

bance at the DCPP site and continued throughout the duration of long-term Project operations.

- A literature review of relevant reports/databases (e.g., IPaC, CNDDB, CNPS, CCH, iNaturalist, eBird) to identify current sensitive vegetation communities and special-status species (as defined by the most recent status designations during the time of the review) that have been recorded in the vicinity (e.g., within 5 miles) of the DCPP site.
- Surveys for current sensitive vegetation communities and special-status plants and wildlife species (as defined by the most recent status designations during the time of the surveys) present or with the potential to occur in or near the DCPP site. Surveys shall be conducted according to the most recent CDFW, USFWS, and/or NMFS protocols. If survey protocols have not been established, the Applicant or its designee shall employ standard survey practices in coordination with the County.
- A report shall be prepared and submitted to the County every 5 years after initial ground disturbance at the DCPP site that includes methods and results from the literature review and surveys discussed above. The report shall also include relevant photographs and maps documenting any new occurrences of sensitive vegetation communities or special-status species (as defined by the most recent status designations during the time of the resource/database review and surveys) observed or identified.
- If newly designated sensitive habitats or special-status species are present during surveys, the County shall be immediately notified, and standard practices and protection measures shall be implemented in coordination with the County to avoid potential impacts. No handling of federal or state listed plants or wildlife shall occur without the applicable regulatory permits.

Based on post-decommissioning activities at the DCPP site, the frequency and responsibility of Plan management and implementation may be modified upon mutual agreement between the Applicant or its designee and the County. These modifications may include reducing the Applicant or its designee's responsibility to only the revised Owner-Controlled Area, transferring responsibility to a third party responsible for operations at the Marina facilities, or other management and implementation procedures as agreed upon.

BIO-6 **Install "No Entry" Signage at DCPP.** Prior to the removal of the Avila Gate Guard House Facilities located at the intersection of Diablo Canyon Road and Avila Beach Drive, the Applicant or its designee shall install permanent signage along the open space boundary adjacent to Diablo Canyon Road/Diablo Ocean Drive and surrounding the Marina facilities informing the public of the area's biological sensitivity and identifying areas closed to public access. Specific content and placement of the signage shall be approved by the San Luis Obispo Planning and Building Department prior to installation. The signage shall be installed in a manner that is clearly visible to the public utilizing the Marina facilities. The signs shall be corrosion resistant and a minimum of 12 inches by 18 inches in size. The signs shall be attached to non-

corrosive metal posts, not less than 3 feet in height from the ground surface. Evidence that the permanent signs have been installed shall be submitted to the County of San Luis Obispo Planning and Building Department within 30 days prior to removal of the Avila Gate Guard House Facilities.

EM-2 Project Plan, Updating, Tracking, and Reporting. See Section 3.

HWQ-1 Prepare and Implement Drainage Plans. See Section 4.11.

HWQ-2 Long-Term Erosion and Sediment Control Plan. See Section 4.11.

Impact BIO-2: Establish and/or spread of noxious and invasive weeds or invasive wildlife species (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

Implementation of Phase 1 has the potential to result in the spread or colonization of non-native weeds or invasive wildlife species. Several invasive or noxious weeds, as defined by CAL-IPC already exist within or near the DCPP site, some in well-established occurrences and often associated with a source of disturbance such as past vegetation clearance and grazing (see Appendix E1). Invasive mollusks, including New Zealand mudsnails (*Potamopyrgus antipodarum*), zebra mussels (*Dreissena polymorpha*), and quagga mussels (*D. bugensis*), have been found in many lakes and river systems in California, and can outcompete and reduce the number of native aquatic invertebrates that a watershed's fauna rely on for food. Although not known from the Irish Hills Watershed, New Zealand mudsnail has been identified within the Nacimiento River in San Luis Obispo County (US Geological Survey [USGS], 2022). To date, CDFW reports indicate that quagga mussels have been contained to Southern California waterbodies, and zebra mussels have been found as far north as the San Justo Reservoir in Central California (CDFW, 2020).

Direct impacts would occur if non-native or invasive species are introduced or spread on the site during vegetation clearing, demolition, or grading. Indirect impacts would occur if these species were to become established and colonize in adjacent areas overtime. Heavy equipment that has been exposed to invasive species could inadvertently introduce these species if soils or plant material is imported from other sites. Invasive species can degrade native habitats, ESHAs, or riparian areas in adjacent areas. The primary threat for the spread of invasive or noxious weeds into the DCPP site would occur during excavation of the SE Borrow Site, expansion of the road leading to the SE Borrow Site, removal of the Discharge Structure, and demolition of the existing Firing Range. The demolition and removal of developed features would expose soils that could also promote the emergence of invasive and noxious weeds if introduced during Phase 1 activities. Such impacts could be associated with the transport of weed seeds or plant parts on vehicles and equipment from outside areas into the Project area. The Proposed Project includes washing all vehicles and equipment prior to entering work areas and utilizing materials that are certified weed-free to limit the introduction and spread of noxious and invasive weeds (AC BIO-8, *Noxious Weed Prevention*).

Indirect impacts could also occur if the upgraded or new septic system associated with the East Canyon Area were to fail resulting in leaching of materials, such as nitrogen and potassium, that provide nutrients and promote soil conditions conducive to the spread of invasive and noxious weeds. For example, weeds are adapted to rapidly take up the nutrients that are released in organic matter and many germinate in response to the presence of nitrate which is used as a cue to indicate the absence of competition (Cornell University, 2018). However, because any upgrades would improve the existing system, which has been in use since circa 1968, the potential risk of failure would be substantially reduced relative to current conditions. Further, the installation of a new system would result in even a greater reduction of potential risks associated with failure of the system.

Although invasive mollusks are not currently known from the Project area, they have been detected in California waters and pose a risk to native species if introduced. These species can survive multiple days out of water. Therefore, the primary risk would be transport from an infested area to the DCPP site via unwashed vehicles or equipment. Pumps or other equipment that have been operated in water supporting these species would require cleaning to prevent the spread of these organisms to the DCPP site.

As part of the Proposed Project, PG&E would delineate work limits, prohibit staging of equipment within 100 feet of aquatic resources, conduct vehicle and equipment inspections to address the potential introduction and spread of noxious and invasive species (AC BIO-4, *Site Maintenance and General Operations*, and AC BIO-8, *Noxious Weed Prevention*).

Impacts from noxious and invasive species would be significant without mitigation. MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*) and MM BIO-4 (*Prepare and Implement a Weed Management Plan*) would be required to reduce noxious and invasive species. The worker training program would inform workers of required measures to reduce bringing noxious or invasive species onto the DCPP site. The Weed Management Plan requires construction practices that reduce potential for noxious and invasive species as well as monitoring and reporting to ensure proper implementation. These measures would ensure that impacts are reduced to less than significant (Class II).

Railyards

Impacts from the introduction or establishment of non-native and invasive species at the PBR and SMVR-SB sites would be similar but of a lesser magnitude when compared to the DCPP site. The largest risk to native species is the introduction and spread of noxious and invasive species at Pismo Creek, which is located adjacent to the PBR site. The SMVR-SB railyard is located in a heavily disturbed area adjacent to agricultural and developed areas. Non-native weeds are common in these areas. However, the introduction of non-native weeds and other species could pose a risk to agricultural lands or make their way to the Guadalupe Lake, located approximately 350 feet south of the SMVR-SB site, or other sensitive resource areas.

However, since Proposed Project activities would be primarily conducted within developed portions of the PBR and SMVR-SB sites, impacts from the introduction and spread of noxious and invasive weeds would be less than significant and no additional mitigation is required (Class III).

Phase 2

Direct and indirect impacts to native species from the introduction and spread of invasive or non-native species during Phase 2 would be similar to those described for Phase 1 (see Phase 1 discussion).

Grading, soil remediation, and other construction or demolition activities would require the use of large equipment, pumps, and other devices that could introduce or spread non-native or exotic species if the equipment is unwashed or carries soil from off-site locations. The level of exposed soils occurring at the DCPP site during Phase 2 would also increase the potential for the introduction and spread of noxious and invasive weeds as many weeds are pioneering species that quickly become established on disturbed soils.

Impacts from non-native and invasive species would be significant without mitigation. The same mitigation measures listed for the DCPP site under Phase 1 would be needed in Phase 2 to ensure that impacts are reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance with CAL FIRE/County requirements. These activities would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. While it is possible that vehicles could transport non-native and invasive weed seeds and parts, it would not be at a level that would exceed current operations at the DCPP site since all post-decommissioning operations would occur within fully developed areas. Therefore, impacts would be considered less than significant, and no mitigation is required (Class III).

Future Actions. There would be no ground disturbance associated with continued operations of the Marina area. During operations, it is possible that vehicles and watercraft could introduce non-native and invasive species if transported from offsite areas. However, the level of activity anticipated during third-party use of the Marina is not expected to exceed current operations at the DCPP site. Therefore, impacts would be considered less than significant, and no mitigation is required (Class III).

Mitigation Measures for Impact BIO-2.

BIO-1 Prepare and Implement a Worker Environmental Awareness Program (WEAP)

BIO-4 Prepare and Implement a Weed Management Plan

Impact BIO-3: Result in the loss, harm, injury, harassment, or potential mortality of common terrestrial wildlife (Class III: Less than Significant).

Phase 1

DCPP Project Site

The DCPP consists of a large, developed area supporting numerous structures, parking areas, boat dock, and energy related infrastructure. Small pockets of native vegetation are present near parking areas, adjacent to buildings and along the coastal bluffs. These areas support a variety of more disturbance-tolerant species, which includes insects, small mammals, reptiles, and birds. The adjacent natural lands and the Irish Hills support a broader assemblage of common wildlife and provide suitable habitat for a number of resident and migratory species (see Section 4.3.1).

Vegetation removal associated with the expansion of the road and excavation of the SE Borrow Site, removal of the Discharge Structure, and demolition of the existing Firing Range during Phase 1 would result in direct impacts from the temporary displacement of native wildlife species that utilize habitat in these areas. Because much of the DCPP site is developed, impacts would be relatively low compared to the acreage of similar habitats available in the region. Many species, such as raptors or larger mammals, typically exhibit broader ranges and would likely move out of the immediate area during Phase 1 activities. Smaller or less mobile animals would be more susceptible to the temporary loss of habitat. As part of the Proposed Project, PG&E has developed a Discharge Structure Demolition and Restoration Plan (see Table 2-2) that includes requirements to be implemented for topsoil salvage and replanting during Phase 1 of the terrestrial portion of the Discharge Structure restoration area.

Phase 1 activities could result in direct impacts from mortality or injury to wildlife due to crushing by vehicles or heavy equipment, particularly if slow-moving or sedentary animals occur in work areas or along roads to and within the DCPP site. However, road traffic that is anticipated during Phase 1, would be less than the number of vehicles that are present for daily operation at the DCPP. More mobile species, such as birds and larger mammals, would be expected to disperse into nearby habitats during most Phase 1 activities. Although ground-dwelling invertebrates, diurnal reptiles, and small mammals are the most likely species to be subject to crushing or entrapment, amphibians can also be particularly vulnerable because many species disperse across uplands between aquatic resources, are small and inconspicuous, and are usually slow in movement. This type of mortality can have detrimental effects on local populations if the loss is continual (Trombulak and Frissell, 2000). Common bat species could potentially utilize existing structures for roosting habitat and be crushed during demolition. Small and less-mobile wildlife species could also be subject to mortality or injury from entrapment in open trenches and excavations or entanglement in netting materials. As part of the Proposed Project, PG&E would establish speed limits on unpaved roads, require exit ramps and inspections at open excavations, and prohibit plastic monofilament netting on materials (AC BIO-4, *Site Maintenance and General Operations*, and AC BIO-5, *General Wildlife Protection*).

Fugitive dust and noise from clearing, grading, and demolition activities would directly impact common wildlife in adjacent habitats including Diablo Creek and the oak woodlands by interfering with breeding or foraging activities, disrupting movement patterns, and causing animals to avoid areas adjacent to the demolition zone. PG&E identified fugitive dust controls and truck and construction noise measures as part of their Proposed Project (AC AQ-1, *Minimize Fugitive Dust*, and AC NOI-2, *Reduce Construction Noise*). Common wildlife species could be subject to injury or mortality if interactions with accidentally spilled or improperly contained hazardous materials occur, including potential lead ingestion at the existing Firing Range. As presented in Table 2-2 of the Project Description, PG&E has included preparation of a SPCC plan. This plan would address the accidental release of hazardous materials and countermeasures to contain, cleanup, and limit the effects of an accidental release of oil and oil-based products.

Indirect impacts would occur if common wildlife species are displaced due to the degradation of habitat from the introduction and spread of noxious and invasive species. Such impacts could be associated with the transport of weed seeds or plant parts on vehicles and equipment from outside areas into the Project area. The Proposed Project includes washing all vehicles and equipment prior to entering work areas and utilizing materials that are certified weed-free to limit the introduction and spread of noxious and invasive weeds (AC BIO-8, *Noxious Weed Prevention*).

Indirect impacts could also occur if the upgraded or new septic system associated with the East Canyon Area were to fail resulting in leaching of materials, such as nitrogen and potassium, that provide nutrients and promote soil conditions conducive to the spread of invasive and noxious weeds. For example, weeds are adapted to rapidly take up the nutrients that are released in organic matter and many germinate in response to the presence of nitrate which is used as a cue to indicate the absence of competition (Cornell University, 2018). However, because any upgrades would improve the existing system, which has been in use since circa 1968, the potential risk of failure would be substantially reduced relative to current conditions. Further, the installation of a new system would result in even a greater reduction of potential risks associated with failure of the system.

Although the risks relative to current conditions would be reduced, indirect impacts as a result of failure of the septic system could also include degradation of water quality for common aquatic wildlife species. Generally, properly installed, sited, and maintained septic systems should not adversely affect water quality. If a failure of the system results in a discharge directly into surface waters, increased levels of nitrogen and phosphorus could cause algal blooms (USEPA [United State Environmental Protection Agency], 2022). An overgrowth of algae can consume oxygen and block sunlight, resulting in mortality to fish and other aquatic organisms. Any upgrades to the existing septic system, or installation of a new system, would be implemented to ensure consistency with County ordinances related to sewage disposal systems and wastewater management (e.g., Titles 19 and 22), including setbacks from surface waters.

With the exception of nesting birds, which are protected by State and federal regulations and described under Impact BIO-4, impacts to common wildlife are generally not considered significant under CEQA. Impacts to common wildlife would be less than significant and no further mitigation is required (Class III).

Although no further mitigation is required, the implementation of MM AQ-1 (*Implement a Decommissioning Activity Management Plan [DAMP]*), MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), MM BIO-2 (*Prepare and Implement a Habitat Restoration and Revegetation Plan*), MM BIO-3 (*Implement Oak and Native Mature Tree Protection Measures*), MM BIO-4 (*Prepare and Implement a Weed Management Plan*), MM BIO-9 (*Conduct Biological Monitoring and Reporting*), MM BIO-10 (*Implement Wildlife Impact Avoidance and Minimization Measures*), MM BIO-20 (*Conduct Preconstruction Surveys for Roosting Bats and Implement Avoidance Measures*) (see Impact BIO-6), and MM EM-2 (*Project Plan Updating, Tracking, and Reporting,* specifically for the DAMP required under MM AQ-1, Habitat Restoration and Revegetation Plan required under MM BIO-2, and Weed Management Plan required under MM BIO-4) would further reduce impacts to common wildlife. These measures include worker training, restoration of habitat, minimizing impacts to trees, weed and dust control, surveys and monitoring, and tracking and enforcement of plans developed as part of the Proposed Project, among other protective requirements.

Railyards

Pismo Beach Railyard. Although the PBR site is primarily developed, native vegetation that occurs in patches within the site, and as broader communities in adjacent areas, provides suitable breeding and foraging habitat for a variety of common wildlife species. Common bat species may utilize existing structures as suitable roosting sites.

Vegetation removal and grading activities would not be required as part of the modifications at the PBR site. Structures that could provide potential roosting habitat for common bat species would also be left intact. Therefore, direct impacts from loss of habitat or roosting sites would not occur. Common wildlife would be directly impacted if injured or killed by crushing, entrapment, or entanglement during rail spur refurbishments or use of the site. These impacts would be similar to those discussed for the DCPP site but would be substantially reduced due to the level of activity that would occur at the PBR site. Increased levels of noise that disrupt normal behaviors or lead to habitat abandonment would result in direct impacts. Although noise levels are anticipated to slightly increase from ambient conditions during modifications at the PBR site, they would be short-term and temporary. Direct impacts would also occur if animals were to interact with hazardous materials that are inadvertently spilled or leaked. Since modifications and use would be primarily conducted within developed portions of the PBR site, impacts to common wildlife from exposure to fugitive dust would not occur.

Indirect impacts resulting from the introduction of noxious and invasive species would also be similar to those discussed for the DCPP site but would be substantially reduced in magnitude. Pismo Creek would be a particular area of concern if noxious weeds or invasive mollusks were to be accidentally introduced. However, because common wildlife species are typically not afforded protection under CEQA and since Proposed Project activities would be primarily conducted within developed portions of the PBR site, impacts from to common wildlife would be less than significant and no additional mitigation is required (Class III).

Although no mitigation is required, the implementation of some of the same mitigation measures listed for the DCPP site, including MM BIO-9 (*Conduct Biological Monitoring and Reporting*), MM BIO-10 (*Implement Wildlife Impact Avoidance and Minimization Measures*), and

MM BIO-20 (*Conduct Preconstruction Surveys for Roosting Bats and Implement Avoidance Measures*) (see Impact BIO-6) would further reduce impacts to common wildlife.

SMVR-SB. Similar to the PBR site, the SMVR-SB site is primarily located on developed land. However, patches of native scrub vegetation at the SMVR-SB site may provide suitable habitat for some urban-tolerant wildlife species.

Vegetation removal and grading activities would not be required as part of the modifications at the SMVR-SB site. Structures that could provide potential roosting habitat for common bat species would also be left intact. Therefore, direct impacts from loss of habitat or roosting sites would not occur. Direct impacts from injury or mortality, increased noise, and interaction with hazardous materials would be similar to those discussed for the PBR site. The installation of temporary site lighting at the SMVR-SB site would result in additional direct impacts if nocturnal wildlife behaviors are disrupted or if nearby dens or burrows are abandoned. Indirect impacts from the introduction of noxious and invasive species would be similar to those discussed for the PBR site. Impacts to common wildlife at the SMVR-SB site would be less than significant and no mitigation is required (Class III).

Although no mitigation is required, the implementation of some of the same mitigation measures listed for the DCPP site, including MM BIO-9 (*Conduct Biological Monitoring and Reporting*), MM BIO-10 (*Implement Wildlife Impact Avoidance and Minimization Measures*), and MM BIO-20 (*Conduct Preconstruction Surveys for Roosting Bats and Implement Avoidance Measures*) (see Impact BIO-6) would reduce impacts to common wildlife.

Phase 2

Direct impacts to common terrestrial wildlife during Phase 2 would be similar in type to those described for Phase 1; however, the majority of impacts associated with the temporary loss of habitat would be completed during vegetation removal activities under Phase 1 (see Phase 1 discussion). During Phase 2, grading and fill activities would be primarily focused on backfilling voids created by the demolition of DCPP structures and restoring the DCPP site to a natural condition that promotes positive drainage. The process of removing the Discharge Structure and completing associated restoration would continue in Phase 2 (see Phase 1 discussion). If any clearing of previously undisturbed areas is required, topsoil would be removed and stockpiled. For Phase 2, PG&E would prepare a Revegetation Plan as part of the Proposed Project (see Section 2.4.4*, Grading and Landscaping [Final Site Restoration*]) that would apply to all temporary disturbance areas and the demolition zone. Upon completion of grading to natural contours, areas would be revegetated to establish native vegetation that is consistent with adjacent wildlife habitat.

Direct impacts from crushing, entrapment, and entanglement would be reduced in magnitude during Phase 2 since most vegetation removal would be completed. Similarly, direct impacts associated with increased levels of noise and exposure to hazardous materials would be reduced in magnitude during Phase 2. However, the potential for fugitive dust and the introduction and spread of noxious weeds would likely increase during Phase 2 activities as the majority of hard-scape features at the DCPP site would be removed resulting in a greater level of exposed soils.

Indirect impacts during Phase 2 would also include degradation of habitat for common aquatic wildlife if natural hydrology of the site is altered in such a way as to adversely affect adjacent vegetation communities due to increased long-term erosion and sedimentation, altered on-site drainage patterns, or additional runoff that would exceed capacity of stormwater conveyance. As part of the Proposed Project's site restoration and pursuant to Section 23.05.042 (Drainage Plan Required) of the San Luis Obispo County Code, a SWMP would be prepared prior to the issuance of any grading or building permits (see Section 2.4.5, *Long-Term Stormwater Management*). The SWMP would require low-impact, long-term design techniques to manage stormwater from the site over the period of time required for revegetation to establish and to minimize potential impacts to Diablo Creek and other unnamed drainages at the DCPP site.

Because common wildlife species are typically not afforded protection under CEQA, impacts to common wildlife would be less than significant, and no mitigation is required (Class III).

Although no mitigation is required, PG&E would implement the same mitigation measures during Phase 2 as those listed for the DCPP site under Phase 1 to reduce impacts to common wildlife.

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. Some common species, including urban-tolerant birds and bats may utilize structures in these facilities for nesting and/or roosting sites. These species may be subject to periodic increases in noise and human presence. However, new facility operations would be performed within fully developed areas and would involve a maximum of 50 workers. These activities are not anticipated to exceed current operations at the DCPP site. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance with CAL FIRE/County requirements. These activities would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. As previously mentioned under the discussion for Phase 1 above, common wildlife species do not receive protection under CEQA. Therefore, no impacts would occur, and no mitigation is required.

Future Actions. During operations, members of the public would be permitted to explore the Marina area. Further, the public would have access uncontrolled along Diablo Canyon Road between the Marina and the former Avila Gate Guard House Facilities. It is possible that third-party use could result in direct impacts to common wildlife if animals are injured or killed from collisions with vehicles or if natural behaviors, such as foraging or breeding, are disrupted during use of the facilities. However, the level of activity anticipated during third-party use of the Marina is not expected to exceed current operations at the DCPP site and, as previously mentioned under the discussion for Phase 1 above, common wildlife species do not receive protection under CEQA. Therefore, no impacts would occur, and no mitigation is required.

Mitigation Measures for Impact BIO-3. No mitigation is required.

Impact BIO-4: Result in loss or disturbance to nesting or breeding birds or raptors (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

With the exception of a few non-native birds, such as European starling (*Sturnus vulgaris*) and house sparrow (*Passer domesticus*), the loss of active bird nests or young is regulated by the Federal Migratory Bird Treaty Act (MBTA) and Fish and Game Code Section 3503. A discussion of potential impacts to special-status bird species is presented under Impact BIO-6. Although nesting bird surveys were not conducted and active nests were not observed during 2020 through 2022 surveys, they likely occur on the existing structures, in native vegetation adjacent to parking areas, on open ground, and within the oak woodlands and scrub habitats throughout the DCPP site. Nesting birds are also expected to occur in the riparian habitats associated with Diablo Creek and isolated wetlands associated with artesian springs and unnamed drainages at the site.

Developed areas at the DCPP site provide suitable breeding and nesting habitat for many common avian species, such as house finch, song sparrow, mourning dove that are tolerant of urbanized environments. Depending on the species, birds may actively nest on the ground close to equipment, on spoil piles, or idle construction equipment. Birds have been documented nesting on vehicles, foundations, construction trailers, and equipment left overnight or during the weekend. As part of the Proposed Project, PG&E would conduct surveys with a qualified biologist prior to the initiation of Phase 1 activities and establish avoidance buffers for active nests (AC BIO-8, *Preconstruction Surveys for Nesting Birds*). PG&E would also provide worker training and biological monitoring by qualified personnel (AC BIO-1, *Worker's Environmental Awareness Training – Biological Resources* and AC BIO-6, *Biological Resources Monitoring Plan*).

The DCPP site provides foraging, cover, and breeding habitat for a variety of resident and migratory non-pelagic bird and raptor species. Most of Phase 1 activities would occur in developed areas that include existing structures and facilities. However, direct impacts to nesting birds would occur from the removal of native vegetation communities that provide suitable habitat during excavation of the SE Borrow Site, removal of the Discharge Structure, and demolition of the existing Firing Range. The majority of direct impacts to suitable nesting bird habitat from vegetation removal would be temporary as most areas would be restored to natural conditions; however, permanent impacts would occur from the expansion of the access road to the SE Borrow Site. This portion of Skyview Road/Ranch Road would be permanently expanded from 12 feet to approximately 20 feet by adding graded aggregate base/crushed rock to each side. Road expansion activities would result in the permanent removal of approximately 0.45 acre of native and non-native vegetation. Any permanent impacts would be offset through the revegetation and restoration of previously developed areas (see Figure 2-36). For example, the existing Firing Range, which has an area of approximately 3.17 acres, would be restored to correspond with adjacent communities of native and non-native vegetation. Although the expansion of the access road to the SE Borrow Site would require trimming of coast live oaks

and other trees that support suitable nesting bird habitat, road limits would be adjusted to avoid the removal of any trees.

As part of the Proposed Project, PG&E has developed a Discharge Structure Demolition and Restoration Plan that would be implemented for revegetation and restoration of the terrestrial area associated with the removal of the Discharge Structure during Phase 1 (see Table 2-2). This plan would include requirements for topsoil salvage and replanting for the terrestrial portion of the Discharge Structure restoration area. This area is primarily dominated by coastal bluff scrub that provides valuable habitat for a number of native avian species. PG&E would also be required to comply with tree removal standards listed under Section 23.05.064 of the Coastal Zone Land Use Ordinance. These standards include tagging of trees to be removed and compliance with removal and replacement criteria.

Elevated levels of fugitive dust and noise would result in direct impacts from the displacement of breeding birds and the abandonment of nests if conducted during the breeding season. Breeding birds may temporarily or permanently leave their territories to avoid these activities, which could lead to reduced reproductive success and increased risk of nest failure. The Proposed Project includes commitments to ensure that fugitive dust and construction noise are limited (AC AQ-1, *Minimize Fugitive Dust*, and AC NOI-2, *Reduce Construction Noise*).

Many avian species are closely associated with or dependent upon specific habitat types. Indirect impacts would occur if noxious and invasive weeds become introduced or spread into adjacent habitat including Diablo Creek and displace native vegetation that is the preferred or obligate habitat for these species. To reduce the potential for impacts from noxious and invasive weeds, PG&E has included requirements for cleaning vehicles and equipment prior to entering work sites and utilizing materials that are certified weed-free as part of the Proposed Project (AC BIO-8, *Noxious Weed Prevention*). Indirect impacts could also occur if the upgraded or new septic system associated with the East Canyon Area were to fail resulting in leaching of materials, such as nitrogen and potassium, that provide nutrients and promote soil conditions conducive to the spread of invasive and noxious weeds. For example, weeds are adapted to rapidly take up the nutrients that are released in organic matter and many germinate in response to the presence of nitrate which is used as a cue to indicate the absence of competition (Cornell University, 2018). However, because any upgrades would improve the existing system, which has been in use since circa 1968, the potential risk of failure would be substantially reduced relative to current conditions. Further, the installation of a new system would result in even a greater reduction of potential risks associated with failure of the system.

Impacts to nesting birds or raptors would be significant without mitigation. Implementation of MM BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) would be required to reduce impacts. Additionally, PG&E would implement MM AQ-1 (*Implement a Decommissioning Activity Management Plan [DAMP]*), MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), MM BIO-2 (*Prepare and Implement a Habitat Restoration and Revegetation Plan*), MM BIO-3 (*Implement Oak and Native Mature Tree Protection Measures*), MM BIO-4 (*Prepare and Implement a Weed Management Plan*), and MM EM-2 (*Project Plan Updating, Tracking, and Reporting*, specifically under the Nesting Bird Management Plan required under MM BIO-7, the DAMP required under MM AQ-1, the Habitat Restoration and

Revegetation Plan required under BIO-2, and the Weed Management Plan required under MM BIO-4) to ensure that impacts are reduced to less than significant (Class II).

These measures would provide protections for nesting birds and raptors through the implementation of a County-approved Nesting Bird Management Plan (NBMP) and worker training program, habitat avoidance and restoration, biological surveys and monitoring, dust and weed controls, and tracking and enforcement of plans developed as part of the Proposed Project, among other protective requirements.

Railyards

Pismo Beach Railyard. The PBR site is mostly developed and is regularly subject to disturbance from current operations. Nonetheless, buildings, railcars, and other structures provide suitable nesting habitat for urban-tolerant avian species. Suitable nesting habitat also occurs within the patches of native woodland and scrub communities that occur at the PBR site. Birds that are associated with riparian habitats can likely be found nesting along Pismo Creek immediately adjacent to the site. Open space to the north of the site provides suitable foraging habitat for a variety of native birds and raptors.

The PBR site does not require demolition work, substantial ground-disturbance, or vegetation removal. Therefore, impacts from the loss of nesting and foraging habitat would not occur. The remaining impacts to nesting birds would be similar in type to those discussed for the DCPP site but would be substantially reduced in magnitude. Although activities at the railyards would be minimal relative to the DCPP site, the potential for the destruction of nests or eggs would still occur. For example, house finch, a species observed at the PBR site, commonly establish nests on structures within urban environments and could use railcars or temporary structures for nesting sites. In addition, killdeer, which was also observed at the PBR site, are ground-nesting birds that establish inconspicuous nesting sites often on top of gravel-based substrates. Direct impacts would occur if nests or eggs are destroyed during activities associated with loading and unloading materials at the PBR site.

Birds that nest in and around the PBR site are likely to be more habituated to noise and human presence compared to species found in more isolated areas. The PBR site is currently subject to daily disturbance from periodic rail traffic and other human activities. Modifications and use of the site would be short-term and temporary and are not anticipated to result in a substantial increase in noise that would adversely affect nesting birds. Nonetheless, direct impacts would occur if nest sites or breeding territories are abandoned as a result of increased levels of noise. Since modifications and use would be primarily conducted within developed portions of the PBR site, impacts to nesting birds from exposure to fugitive dust would not occur. Indirect impacts would include the degradation of nesting and foraging habitat from the introduction and spread of noxious weeds.

Impacts would be significant without mitigation. The implementation of some of the same mitigation measures listed for the DCPP site during Phase 1, including MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), and MM BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) would ensure that impacts are reduced to less than significant (Class II).

SMVR-SB. The SMVR-SB site is primarily developed and subject to routine disturbance during current storage and rail operations. Suitable nesting habitat for avian species occurs within the existing structures and the various undeveloped private lands that surround the site. Adjacent agricultural fields, grasslands, and detention basins support suitable foraging habitat for numerous birds and raptors.

The SMVR-SB site does not require demolition work, substantial ground-disturbance, or vegetation removal. Therefore, impacts from the loss of nesting and foraging habitat would not occur. Direct and indirect impacts would include the destruction of nests or eggs, disturbance from increased noise, and degradation of habitat from the introduction and spread of noxious and invasive weeds. Additionally, installation of the new rail spur and road base could result in increased levels of fugitive dust. Direct impacts would occur if nesting birds abandon nest sites or breeding territory from exposure to fugitive dust. PG&E would minimize fugitive dust with the implementation of specified fugitive dust controls (AC AQ-1, *Minimize Fugitive Dust*). Use of temporary site lighting would result in direct impacts if birds abandon or avoid nesting sites or suitable breeding territories due to excess illumination. Artificial light can change birds' perception of habitat quality, resulting in selection or avoidance of illuminated areas (Adams et al., 2021).

Impacts to nesting birds would be significant without mitigation. Implementation of some of the same mitigation measures listed for the DCPP site during Phase 1, including MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), and MM BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*) in addition to MM AES-1 (*SMVR Lighting Guidelines*), which includes requirements to prevent a measured increase in illumination onto adjacent properties, would ensure that impacts are reduced to less than significant (Class II).

Phase 2

The majority of vegetation removal and tree trimming would be completed during Phase 1. Therefore, direct impacts to nesting birds resulting from the temporary loss of habitat would be similar in type but substantially reduced in magnitude during Phase 2. The process of removing the Discharge Structure and completing associated restoration of the terrace and upland habitat would continue in Phase 2 (see Phase 1 discussion). If any clearing of previously undisturbed areas is required, topsoil would be removed and stockpiled. For Phase 2, PG&E would also prepare a Revegetation Plan as part of the Proposed Project (see Section 2.4.4*, Grading and Landscaping [Final Site Restoration*]) that would apply to temporarily disturbed areas that support potential nesting bird habitat.

It is expected that ground-nesting or disturbance-tolerant species would continue to nest at the site, within construction equipment, or in adjacent habitats during Phase 2. Direct impacts would occur if nests or eggs are destroyed or breeding behaviors are disrupted from construction noise during Phase 2 activities; however, these impacts would also be substantially reduced in magnitude relative to Phase 1 since most of vegetation and structures that could support nesting birds would have already been removed or demolished and the level of equipment and personnel would decline. The potential for fugitive dust and the introduction and spread of noxious weeds would likely increase during Phase 2 activities as most of hardscape features at the DCPP site would be removed resulting in a greater level of exposed soils. The same

commitments listed under Phase 1 would be required under Phase 2 as part of the Proposed Project. These include worker training, preconstruction surveys for nesting birds, biological monitoring, construction dust and noise controls, and noxious weed prevention.

Impacts to nesting birds would be significant without mitigation. With the implementation of the same mitigation measures presented for the DCPP site under Phase 1, impacts would be reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. New facilities may provide suitable nesting sites for some urban-tolerant bird species. Birds that potentially utilize nesting sites at these facilities could be subject to periodic increases in noise and human presence. However, new facility operations would be performed within fully developed areas and are not anticipated to exceed current operations at the DCPP site. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance with CAL FIRE/County requirements. These activities would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. Therefore, impacts would be less than significant, and no mitigation is required (Class III).

Future Actions. Numerous bird and raptor species would be expected to utilize the DCPP site for nesting and foraging habitat during Marina operations permitted by a third-party. Although there would be no ground disturbance or tree trimming with continued operations and the level of activity is not expected to exceed current operations at the DCPP site, it is possible that nesting birds could be directly impacted if nests or eggs are destroyed or breeding behavior is disrupted, as members of the public would be allowed to explore the Marina area. Because the public would have uncontrolled access along Diablo Canyon Road upon removal of the Avila Gate Guard House Facilities, similar direct impacts to nesting birds could occur if members of the public disrupt breeding behavior or disturb nesting sites located in habitats adjacent to the road. Over time, most species would become acclimated to the baseline level of disturbance; however, impacts would be significant without mitigation. MM BIO-6 (*Install "No Entry" Signage at DCPP*), which includes restrictions for entering unauthorized areas during future actions, would ensure that impacts are reduced to less than significant (Class II).

Mitigation Measures for Impact BIO-4.

AES-1 **SMVR Lighting Guidelines** See Section 4.1.

AQ-1 **Implement a Decommissioning Activity Management Plan (DAMP)** See Section 4.2.

BIO-1 **Prepare and Implement a Worker Environmental Awareness Program (WEAP)**

BIO-2 **Prepare and Implement a Habitat Restoration and Revegetation Plan**

BIO-3 **Implement Oak and Native Mature Tree Protection Measures**

BIO-4 Prepare and Implement a Weed Management Plan

BIO-6 Install "No Entry" Signage at DCPP

BIO-7 Prepare and Implement a Nesting Bird Management Plan Prior to submittal of any County Grading/Construction Permits related to Decommissioning, the Applicant or its designee shall prepare and implement a Nesting Bird Management Plan (NBMP). The NBMP shall describe methods to minimize potential Project effects to nesting birds and avoid any potential for unauthorized take. No Phase 1 or Phase 2 activities at the DCPP, PBR, or SMVR-SB site shall proceed within 300 feet of active nests for common bird species or within 500 feet for raptors or special-status bird species until approval of the NBMP by the County of San Luis Obispo Planning and Building Department (County) in consultation with CDFW and USFWS. The NBMP shall include the following components:

NBMP Content. The NBMP shall include: (1) definitions of default nest avoidance buffers for each species or group of species, depending on characteristics and conservation status for each species; (2) a notification procedure for buffer distance reductions should they become necessary; (3) a rigorous monitoring protocol, including qualifications of monitors, monitoring schedule, and field methods, to ensure that any Project-related effects to nesting birds will be minimized; and (4) a protocol for documenting and reporting any inadvertent contact or effects to birds, nests, or eggs. The approved NBMP shall be referenced in all construction permit applications and plans submitted for Decommissioning activity.

The paragraphs below describe the NBMP requirements in further detail.

Background. The NBMP shall include:

- A summary of applicable State and federal laws and regulations, including definition of what constitutes a nest or active nest under State and federal law.
- A procedure for amendment of the NBMP should there be changes in applicable State or federal regulations, or as necessary for adaptive management upon approval by the County, in consultation with CDFW and USFWS.
- A list of bird species potentially nesting within or near the DCPP, PBR, or SMVR-SB sites, indicating approximate nesting seasons, nesting habitat, typical nest locations (e.g., ground, vegetation, structures, etc.), tolerance to disturbance (if known), and any conservation status for each species. This section will also note any species that do not require avoidance measures (e.g., European starling, house sparrow, etc.).
- A list of the types of Project activities through Phase 1 and Phase 2 that may occur at the DCPP, PBR, and SMVR-SB sites during the nesting season, with a short description of the noise and physical disturbances resulting from each activity.
- Clearing of any vegetation, grading, building demolition, or any other Project-related activity that may adversely affect breeding birds shall be scheduled to

avoid the breeding season (January 1 through August 31) to the maximum practicable extent.

Preconstruction Nest Surveys. Prior to any Project activities scheduled during the breeding period (January 1 through August 31), the Applicant or its designee shall conduct preconstruction surveys for nesting birds and raptors at the DCPP, PBR, and SMVR-SB sites. The NBMP shall describe the proposed field methods, survey timing, and qualifications of survey biologists. Biologist qualifications will be subject to review and approval by the County. The biologists conducting the surveys shall be experienced in survey techniques and familiar with standard nest-locating techniques. Nest surveys will focus on visual searches for nest locations and observations of bird activities and movement to detect nesting activity (e.g., carrying nest materials or food, territorial displays, courtship behavior). Surveys shall be conducted in accordance with the following guidelines:

- Surveys shall be conducted to include all impact areas at the DCPP, PBR, and SMVR-SB sites, as well as construction equipment and structures. Surveys shall extend within 500 feet of these areas for raptors and 300 feet for non-raptor species. During decommissioning activities, nest searches shall be conducted at least every 3 days during the breeding season to prevent nest starts on vehicles and equipment. If birds are found to be nesting in facility structures or construction equipment and the nests contain eggs or young, buffers as described below shall be implemented.
- Surveys shall be conducted for each of the sites no more than 4 days prior to the start of Project activities.
- Within 14 days of completion of the surveys, the Applicant or its designee shall provide the County with a report describing the findings, including the date, time, and duration of the survey; identity of the surveyor(s); a list of species observed; and electronic data identifying nest locations and boundaries of established buffer zones. The format and contents of the report will be described in the draft NBMP and will be subject to review and approval by the County.

Nest Buffers and Acceptable Activities. The NBMP shall specify measures to delineate buffer zones, to consist of clearly visible marking and signage. Buffer locations shall be communicated to the construction contractor(s) and shall remain in effect until the young have fledged or the nest is no longer active. In addition, the NBMP shall specify measures to ensure that buffers are observed, including a direct communication and decision protocol to stop work within buffer zones. In some cases, active nests may be identified after work has commenced. Therefore, the NBMP shall include a protocol for halting work within the buffer zone, securing the work site, and removing personnel and equipment from the buffer zone.

The NBMP shall identify bird species (or groups of species) that are relatively tolerant or intolerant of human activities and shall specify smaller or larger buffer zones as appropriate for each species (or groups of species).

The NBMP shall identify acceptable work activities within nest buffers (e.g., pedestrian access for inspections, drive through access only, etc.) including conditions and restrictions and any monitoring requirements.

Nest Buffer Modifications or Reductions. At times, the Applicant or its designee may propose buffer zones differing from those approved in the NBMP. Buffer adjustments shall be reviewed and approved by a qualified avian biologist who has been approved by the County in consultation with CDFW and USFWS. Nest buffer reductions requests shall require a clear rationale for why the reduction is needed, the tolerance of the bird to disturbance, and triggers to halt work should the bird show signs of distress or agitation. The NBMP shall outline a procedure and timing requirements for notifying the County of any planned adjustments to nest buffers. Separate and distinct procedures will be provided for special-status species and raptors. The NBMP will list the information to be included in the buffer reduction notifications in a standardized format for submittal to the County.

Nest Deterrents. The NBMP shall describe any proposed measures or deterrents (e.g., visual or auditory hazing devices, netting, etc.) to prevent or reduce bird nesting activity on Project facilities or equipment. It shall also include timing for installation of nest deterrents and field confirmation to prevent effects to any active nest; guidance for the contractor to install, maintain, and remove nest deterrents according to product specifications; and periodic monitoring of nest deterrents to ensure proper installation and maintenance and to prevent injury or entrapment of birds or other wildlife.

Removal of Inactive Nests. The NBMP shall specify a procedure for removal of inactive nests, including verification that the nest is inactive and a notification/approval process.

Monitoring. The Applicant or its designee shall be responsible for monitoring the implementation, conformance, and efficacy of the avoidance measures discussed above. The NBMP shall include specific monitoring measures to track any active bird nest within or adjacent to Project work areas, bird nesting activity, Project-related disturbance, and outcome of each nest. For nests with reduced buffer zones, the Applicant or its designee shall monitor each nest until the young have fledged and dispersed or until the nest is determined inactive. Active nest monitoring shall continue throughout the breeding season during each year of all Phase 1 and Phase 2 activities.

Reporting. Throughout all Phase 1 and Phase 2 activities, nest locations, Project activities in the vicinity of active nests, and any adjustments to buffer zones shall be updated and electronically submitted to the County on a weekly basis. The Applicant or its designee shall provide immediate notification to the County for all buffer reductions or nest-related non-compliance issues, including corrective actions taken or to be taken. The NBMP shall include a proposed format for providing the County with daily and weekly monitoring reports. At the conclusion of each year's breeding season, the Applicant or its designee shall submit an annual NBMP report to the

County, CDFW, and USFWS. Specific format and contents of the annual report will be reviewed and approved by the County in consultation with CDFW and USFWS.

EM-2 Project Plan Updating, Tracking, and Reporting See Section 3.

Impact BIO-5: Result in the loss or disturbance to any special-status plant species or their critical habitat (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

There were no federally- or State-listed plants detected at the DCPP site during 2021 and 2022 botanical surveys and critical habitat for federally-listed species does not occur at the site. Based on known occurrences in the general region and the absence of suitable habitat, no federally- or State-listed plant species are expected to occur. Although plant expression was considered good at the DCPP site during surveys and occurrences of non-listed special-status plants were observed, the recent drought conditions have likely limited the detectability of some annual plants in the general region.

One non-listed special-status plant species, Hoffman's sanicle, was observed at the DCPP site during botanical surveys. In addition, ocean bluff milk-vetch is assumed to be present based on the species' range and suitable habitat conditions at the DCPP site. Several additional non-listed special-status plants have the potential to occur at the DCPP site or in adjacent habitats (see Appendices E2 and E3). Hoffman's sanicle and ocean bluff milk-vetch are ranked as CRPR List 4 plants. For this analysis, impacts to a small number (i.e., a few individual plants or less than ten percent of the total occurrence) of CRPR List 4 plants would not be considered a significant impact. However, direct and indirect impacts would occur if these thresholds are exceeded or if plants that are designated as CRPR List 1B or 2 are determined to be present.

Most ground-disturbing activities during Phase 1 would occur within developed areas. However, vegetation communities that could support Hoffman's sanicle, including coyote brush scrub, California sagebrush scrub, bush monkeyflower scrub, and coast live oak woodlands would be impacted during Phase 1 vegetation removal and grading activities. The majority of direct impacts to suitable habitat for Hoffman's sanicle would be temporary as most areas would be restored to natural conditions; however, permanent impacts would occur from the expansion of the access road to the SE Borrow Site. This portion of Skyview Road/Ranch Road would be permanently expanded from 12 feet to approximately 20 feet by adding graded aggregate base/crushed rock to each side. These activities would result in the permanent removal of approximately 0.08 acre of California sagebrush scrub and 0.09 acre of coast live oak woodland understory. However, any permanent impacts would be offset through revegetation and restoration of previously developed areas (see Figure 2-36).

Coastal bluff scrub that supports suitable habitat for ocean bluff milk-vetch would be limited to temporary impacts during the removal of the Discharge Structure. As part of the Proposed Project, PG&E has developed a Discharge Structure Demolition and Restoration Plan (see Table 2-2) that would be implemented for the terrestrial area temporarily disturbed during the

removal of the Discharge Structure. This plan includes requirements for topsoil salvage and replanting of the coastal bluff scrub habitat that comprises much of the terrestrial portion of the Discharge Structure restoration area.

Direct impacts would occur if listed or CRPR List 1B or 2 are present and individual plants or their seed banks are destroyed during Phase 1 activities. Direct impacts would also occur if more than ten percent of CRPR List 4 plants or their seed banks are removed. For example, expansion of the access road and excavation of the SE Borrow Site is likely to remove Hoffman's sanicle individual plants. If present, individual ocean bluff milk-vetch plants could be destroyed during the removal of the Discharge Structure. The Proposed Project would include clearly defined work areas to restrict access of vehicles and heavy equipment outside of those areas (AC BIO-4, *Site Maintenance and General Operations*).

Special-status plants would also be directly impacted if vegetation removal and grading result in degradation of local soil conditions from increased erosion or if individual plants are destroyed or damaged from exposure to hazardous materials or excess dust. PG&E would implement several plans as part of the Proposed Project during Phase 1 activities to limit erosion, control sources of contaminants, and minimize fugitive dust (see Section 2, *Project Description (Phases 1 and 2),* Table 2-2). These plans include a site-specific Stormwater Pollution Prevention Plan (SWPPP) (AC BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*). The SWPPP would contain BMPs designed to minimize erosion and control sediment during decommissioning activities. The Proposed Project also includes a Preliminary Erosion and Sediment Control Plan that identifies BMPs, such as perimeter controls (e.g., silt fencing and fiber rolls) and hydro-seeding, to control erosion and sedimentation from the DCPP site during grading and restoration activities (PG&E, 2020b). The SWPPP would also require site-specific BMPs to reduce or prevent the accidental release of hazardous materials and other pollutants. These would include designating areas for refueling or washing equipment, the use of secondary containment (i.e., drip pans), and requiring spill control kits be kept on-site. In addition to the SWPPP, the development and implementation of a SPCC Plan (see Section 2, *Project Description (Phases 1 and 2),* Table 2-2) would address countermeasures to contain, cleanup, and remediate an accidental release of oil and oil-based products. PG&E would also require designated washing and fueling areas to be placed away from sensitive biological resource areas (AC BIO-4, *Site Maintenance and General Operations*). Several conditions to control fugitive dust and limit the areas of disturbance, where possible, would also be included as part of the Proposed Project (AC AQ-1, *Minimize Fugitive Dust*, and AC AQ-5, *SLOAPCD Fugitive Dust Mitigation Measures*). Additionally, PG&E would delineate work limits and staging areas, minimize disturbance, and conduct routine inspections of equipment for leaks (AC BIO-4, *Site Maintenance and General Operations*).

Indirect impacts would occur from the introduction of noxious and invasive weeds that degrades habitat or results in the displacement of special-status plants. The Proposed Project includes conditions, such as washing of all vehicles and equipment prior to entering work areas and utilizing materials that are certified weed-free to prevent the introduction and spread of noxious and invasive weeds (AC BIO-8, *Noxious Weed Prevention*). Indirect impacts could also occur if the upgraded or new septic system associated with the East Canyon Area were to fail resulting in leaching of materials, such as nitrogen and potassium, that provide nutrients and promote soil conditions conducive to the spread of invasive and noxious weeds. For example, weeds are

adapted to rapidly take up the nutrients that are released in organic matter and many germinate in response to the presence of nitrate which is used as a cue to indicate the absence of competition (Cornell University, 2018). However, because any upgrades would improve the existing system, which has been in use since circa 1968, the potential risk of failure would be substantially reduced relative to current conditions. Further, the installation of a new system would result in even a greater reduction of potential risks associated with failure of the system.

Due to the long-term nature of the Proposed Project, there is the potential that existing regulatory requirements associated with special-status plants may be modified or new designations may be assigned for species with the potential to occur at the DCPP site. For example, some common plants that are present at the DCPP site could receive new protections if they are designated as special-status species during the implementation of the Proposed Project. Similarly, plants that are currently considered special-status species at the DCPP site could be afforded additional protections under federal, State, and local laws and regulations. Indirect impacts could occur if plant species present at the DCPP site receive new or additional regulatory protections that are not currently covered within the context of this analysis.

Impacts to special-status plants would be significant without mitigation. The implementation of MM BIO-8 (*Conduct Preconstruction Surveys for Special-Status Plants and Implement Avoidance Measures*) would be required to reduce impacts to special-status plants. Additionally, MM AQ-1 (*Implement a Decommissioning Activity Management Plan [DAMP]*), MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), MM BIO-2 (*Prepare and Implement a Habitat Restoration and Revegetation Plan*), MM BIO-3 (*Implement Oak and Native Mature Tree Protection Measures*), MM BIO-4 (*Prepare and Implement a Weed Management Plan*), MM BIO-5 (*Prepare and Implement a Biological Resources Adaptive Management Plan*), MM EM-2 (*Project Plan Updating, Tracking, and Reporting*, specifically for the DAMP required under MM AQ-1, Habitat Restoration and Revegetation Plan required under MM BIO-2, the Weed Management Plan required under MM BIO-4, and the Biological Resources Adaptive Management Plan required under MM BIO-5), and HWQ-1 (*Prepare and Implement Drainage Plans*) would be required to ensure that impacts are reduced to less than significant (Class II).

These mitigation measures would include preconstruction surveys for special-status plants, clearly delineating special-status plant locations for avoidance in the field, if feasible, mandatory setbacks from sensitive resource areas, a County-approved worker training program, habitat restoration, dust and weed controls, implementation of a Construction Drainage Plan, and plan tracking and enforcement, among other requirements.

Railyards

Pismo Beach Railyard. There were no federally- or State-listed plants detected at the PBR site during 2021 and 2022 botanical surveys and critical habitat for federally-listed species does not occur at the site. Based on current species ranges and the presence of marginal habitat, there is a low potential for listed plant species, including marsh sandwort (FE, SE, CRPR List 1B.1), La Graciosa thistle (FE, ST, CRPR List 1B.1), Pismo clarkia (FE, SR, CRPR List 1B.2), and Gambel's water cress (FE, ST, CRPR List 1B.1) to occur. One non-listed special-status plant, black-flowered figwort (CRPR List 1B.2), was observed in a depression adjacent to the PBR site during botanical

surveys. Several additional non-listed special-status plants have the potential to occur at the PBR site or in adjacent habitats (see Appendices E2 and E3).

The PBR site is primarily developed with patches of native coast live oak woodlands occurring along the western edge of the site. Additionally, small, isolated bulrush marshes are interspersed with ruderal habitat along the eastern edge of the site. The native vegetation communities at the site and in adjacent riparian habitat associated with Pismo Creek could support special-status plants; however, vegetation removal and grading would not be required at the PBR site. Although it is unlikely, direct impacts would occur if work activities were to result in the removal or destruction of special-status plants. The Proposed Project would include clearly defined work areas restricting access of vehicles and heavy equipment outside of those areas (AC BIO-4, *Site Maintenance and General Operations*).

Direct impacts would also occur if special-status plants are subject to increased exposure to hazardous materials and fugitive dust. Indirect impacts would include the introduction and spread of noxious and invasive weeds. However, since activities at the PBR site would be primarily conducted within developed areas, such impacts are not likely to occur.

However, impacts would be significant without mitigation. The implementation of mitigation measures BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*) and MM BIO-8 (*Conduct Preconstruction Surveys for Special-Status Plants and Implement Avoidance Measures*), would ensure that impacts are reduced to less than significant (Class II).

SMVR-SB. There were no special-status plants identified at the SMVR-SB site during 2021 and 2022 botanical surveys and critical habitat for federally-listed species does not occur at the SMVR-SB site. Although the site is primarily developed, there is a low potential for disturbance-tolerant special-status plant species, such as paniculate tarplant (*Deinandra paniculata*) (CRPR List 4.2), to occur. Several additional non-listed special-status plants have the potential to occur at the SMVR-SB site (see Appendices E2 and E3).

The SMVR-SB site is primarily developed or characterized by ruderal vegetation communities; however, some isolated patches of scrub habitat are present. As such, direct and indirect impacts would be similar in type and magnitude to those discussed for the PBR site.

Impacts would be significant without mitigation. Implementation of MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*) and MM BIO-8 (*Conduct Preconstruction Surveys for Special-Status Plants and Implement Avoidance Measures*) would ensure impacts are reduced to less than significant (Class II).

Phase 2

Direct impacts to special-status plants at the DCPP site would be similar in type as those described for Phase 1 (see Phase 1 discussion). However, impacts from the destruction or removal of individual plants and seed banks and the temporary loss of habitat would be substantially reduced in magnitude during Phase 2 since the majority of initial ground-disturbing activities would be completed. The process of removing the Discharge Structure and completing associated restoration would continue during Phase 2 (see Phase 1 discussion). If any clearing of previously undisturbed areas is required, topsoil would be removed and stockpiled. For Phase

2, PG&E would also prepare a Revegetation Plan as part of the Proposed Project (see Section 2.4.4, *Grading and Landscaping [Final Site Restoration]*) that would apply to all temporary disturbance areas and the demolition zone. Upon completion of grading to natural contours, areas would be revegetated to establish native vegetation that is consistent suitable habitat for special-status plants known to occur in the Project area.

Direct impacts from erosion and exposure to fugitive dust would be similar but likely increase in magnitude during Phase 2 activities as the majority of hardscape features at the DCPP site would be removed resulting in a greater level of exposed soils. If special-status plants are exposed to hazardous materials, direct impacts would be similar in type and magnitude to those discussed for the DCPP site during Phase 1 activities. PG&E would minimize erosion, fugitive dust, and release of hazardous materials, during Phase 2, as described in the Project Description (AC AQ-1, *Minimize Fugitive Dust*; AC BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*; and AC BIO-4, *Site Maintenance and General Operations*).

Ongoing grading activities would result in indirect impacts if the hydrology of the site is altered in such a way as to adversely affect special-status plants due to increased long-term erosion and sedimentation, altered on-site drainage patterns, or additional runoff that would exceed capacity of stormwater conveyance. As part of the Proposed Project's site restoration and pursuant to Section 23.05.042 (Drainage Plan Required) of the San Luis Obispo County Code, a SWMP would be prepared prior to the issuance of any grading or building permits (see Section 2.4.5, *Long-Term Stormwater Management*). The SWMP would require management of stormwater drainage from the site over the period of time for vegetation to establish and to minimize potential sediment impacts to adjacent habitat for special-status plants. Indirect impacts from the introduction and spread of noxious and invasive weeds would be similar to those discussed for the DCPP site under Phase 1 but would increase in magnitude due to the level of exposed soil on-site during Phase 2 activities. Indirect impacts associated with potential changes to existing regulatory requirements or new designations for special-status plants would be similar to those discussed for the DCPP site under Phase 1.

Impacts would be significant without mitigation. Therefore, the same mitigation measures listed for Phase 1 activities at the DCPP site would be implemented. Additionally, MM HWQ-1 (*Long-Term Erosion and Sediment Control Plan*), which requires the preparation and implementation of a Post-Decommissioning Drainage Plan prior to initiating Phase 2 activities and MM HWQ-2 (*Long-Term Erosion and Sediment Control Plan*), which would identify BMPs to control erosion and sedimentation from the site during grading and final site restoration activities would be required. The implementation of these mitigation measures would ensure that impacts are reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. New facility operations would be performed within fully developed and fenced areas that do not support suitable habitat for special-status plants. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance

with CAL FIRE/County requirements. Although some of these activities may encroach on habitat suitable for special-status plants, they would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. Therefore, impacts would be less than significant, and no mitigation is required (Class III).

Future Actions. Once permitted by a third-party, use of the Marina facilities would be limited to previously disturbed areas and would avoid activities within habitat that supports special-status plants. Although there would be no ground disturbance or tree trimming with continued operations, it is possible that special-status plants could be directly impacted if individual plants are trampled or destroyed as the public would be allowed to explore the Marina area and would have uncontrolled access to natural areas adjacent to Diablo Canyon Road upon removal of the Avila Gate Guard Facilities. Indirect impacts to special-status plants could occur as a result of the introduction of invasive and noxious weeds from offsite transport via vehicles and watercraft during post-decommissioning operations. Impacts to special-status plants would be significant without mitigation. Therefore, MM BIO-6 (*Install "No Entry" Signage at DCPP*), which includes restrictions for entering unauthorized areas during future actions, would ensure that impacts are reduced to less than significant (Class II).

Mitigation Measures for Impact BIO-5.

AQ-1 **Implement a Decommissioning Activity Management Plan (DAMP)** See Section 4.2.

BIO-1 **Prepare and Implement a Worker Environmental Awareness Program (WEAP)**

BIO-2 **Prepare and Implement a Habitat Restoration and Revegetation Plan**

BIO-3 **Implement Oak and Native Mature Tree Protection Measures**

BIO-4 **Prepare and Implement a Weed Management Plan**

BIO-5 **Prepare and Implement a Biological Resources Adaptive Management Plan**

BIO-6 **Install "No Entry" Signage at DCPP**

BIO-8 **Conduct Preconstruction Surveys for Special-Status Plants and Implement Avoidance Measures.** The Applicant or its designee shall implement the following tasks to mitigate any direct and indirect impacts to special-status plants.

Preconstruction Surveys. Prior to initial ground disturbance at the DCPP site and Phase 1 activities at the PBR site, a County-approved plant ecologist or botanist shall conduct surveys for special-status plants in all areas subject to ground-disturbing activities with a 100-foot buffer (for the DCPP site only) and Phase 1 activities (for PBR site only). The surveys shall be conducted during the appropriate blooming period(s) according to protocols established by CDFW and CNPS (CDFW, 2018, or more recent if available). Surveys shall be valid for a period of 3 years. If vegetation removal or initial site disturbance in a surveyed area does not occur within 3 years, surveys shall be repeated.

Any individuals and/or populations of special-status plants found during surveys shall be fully described, mapped and a CNPS Field Survey Form or written equivalent shall

be prepared. A report detailing the results of each survey shall be provided to the County of San Luis Obispo Planning and Building Department (County) no more than 30 days prior to initial ground disturbance at the DCPP site.

Avoidance. Prior to any ground-disturbing activities at the DCPP site or Phase 1 activities at the PBR site, the Applicant or its designee shall clearly delineate the limits of disturbance with staking, flagging, or other suitable markers. Any individuals and/or populations of special-status plants identified during the surveys shall be protected using staking, flagging, or fencing. The buffer for herbaceous and shrub species shall be, at a minimum, 50 feet from the perimeter of the individual plant or plant population. A smaller buffer may be established by the County-approved plant ecologist or botanist, provided there are adequate measures in place to avoid the impacts to the individual plant or plant population. If Project activities result in the loss of more than 10 percent of an onsite population of any CRPR List 1.B or CRPR List 2 species, mitigation shall be required as described below.

Salvage. If Project activities result in the loss of more than 10 percent of an onsite population of any CRPR List 1.B or CRPR List 2 species, the Applicant or its designee shall develop a Salvage and Relocation Plan based on the life history of the species affected. The plan shall include at a minimum: (a) collection/salvage measures for plants and seed banks, to retain intact soil conditions and maximize success likelihood; (b) details regarding storage of plants or seed banks; (c) location of the proposed recipient site, and detailed site preparation and plant introduction techniques; (d) time of year that the salvage and replanting or seeding will occur and the methodology of the replanting; (e) a description of the irrigation, if used; (f) success criteria; and (g) a detailed monitoring plan, commensurate with the plans' goals. The Salvage and Relocation Plan shall be submitted to the County for review and approval a minimum of 30 days prior to the start of salvage activities.

EM-2 **Project Plan Updating, Tracking, and Reporting** See Section 3.

HWQ-1 **Prepare and Implement Drainage Plans** See Section 4.11.

HWQ-2 **Long-Term Erosion and Sediment Control Plan** See Section 4.11.

Impact BIO-6: Result in the loss or disturbance to special-status terrestrial species, including invertebrates, fish, amphibians, reptiles, birds, and mammals or their critical habitat (Class II: Less than Significant with Mitigation).

The following discussion evaluates potential impacts to special-status wildlife species that are known to occur or could be present within the Project area. "Take" of any federal or State listed species, as defined by Section 3 of the ESA and Section 86 of the Fish and Game Code, would only be authorized through the context of the appropriate regulatory permits (i.e., Biological Opinion, Incidental Take Permit) from USFWS, NMFS, and/or CDFW. Pursuant to the California Fish and Game Code, fully-protected species may not be taken or possessed at any time and no permits may be issued for their take (with limited exceptions that do not pertain to the Proposed Project).

Phase 1

DCPP Project Site

Most of Phase 1 ground disturbance at the DCPP site would occur within ruderal vegetation communities and developed land cover types. Except for potential nesting sites for urban adapted birds and roosting sites for some special-status bat species, these areas do not typically support suitable habitat for special-status wildlife. Vegetation removal within riparian habitats associated with Diablo Creek would be avoided. Therefore, direct impacts from the removal of suitable stream habitat for steelhead and other aquatic special-status species would not occur.

Upland communities provide suitable refuge, foraging, breeding, and dispersal habitat for a variety of special-status animals. Although not documented at the DCPP site, Morro shoulder-band snail, if present, could utilize leaf litter or shrubby microhabitats within a variety of vegetation communities for foraging and refuge. Crotch's bumble bee often nest underground in abandoned holes made by a wide range of species, including insects, ground squirrels, mice, and rats. Like all bumble bees, Crotch's bumble bee colonies depend on floral resources for their nutritional needs and are generalist foragers, meaning they gather pollen and nectar from a wide variety of flowering plants. Suitable nesting and foraging habitat for Crotch's bumble bee occurs throughout native and non-native upland vegetation at and adjacent to the DCPP site. Special-status amphibians and reptiles, such as California red-legged frog, lesser salamander, or western pond turtle may utilize upland communities at the DCPP site during migration from breeding to non-breeding habitat and some may travel over a mile during these periods. Scrub communities at the DCPP site provide suitable foraging habitat for special-status birds, such as loggerhead shrike, while oak woodlands support potential nesting sites for white-tailed kite. Large tracts of native and nonnative grasslands within and immediately adjacent to the DCPP site provide habitat for documented overwintering burrowing owl. Small to mid-size mammals, such as San Diego desert woodrat, ringtail, and American badger are not expected to establish denning sites in developed areas of the DCPP site; however, native vegetation communities within and adjacent to the site provide suitable denning habitat for these species. Several woodrat middens were observed during surveys in native habitat throughout the site. Special-status bats could establish roosting sites in developed structures or dense woodlands at the DCPP site.

During Phase 1, approximately 0.45 acre and 17.85 acres of native and nonnative upland vegetation communities would be subject to direct impacts from permanent and temporary removal and grading activities, respectively (see Table 4.3-6). Permanent impacts would be associated with the expansion of the access road to the SE Borrow Site. This portion of Skyview Road/Ranch Road would be expanded from 12 feet to approximately 20 feet by adding graded aggregate base/crushed rock to each side. Expansion activities along this section of the road would result in the permanent removal of approximately 0.08 acre of California sagebrush scrub and 0.28 acre of wild oats and annual brome grassland. Approximately 0.09 acre of coast live oak woodland understory would also be removed; however, the road limits would be adjusted to avoid individual tree removal. Any permanent impacts would be offset through the revegetation and restoration of previously developed areas (see Figure 2-36). For example, the existing Firing

Range, which has an area of approximately 3.17 acres would be restored to correspond with adjacent communities of native and non-native vegetation.

Temporary impacts would occur from the excavation of the SE Borrow Site, removal of the Discharge Structure, demolition of the existing Firing Range, and trimming of oaks and other native mature trees (see Table 4.3-6). The removal of upland vegetation within the limits of disturbance at the DCPP site would be temporary and would represent only a small fraction of habitat available for special-status wildlife throughout the site and in the broader Irish Hills region. Smaller or less mobile special-status species, such as California red-legged frog, California legless lizard, or San Diego desert woodrat, would be more susceptible to the temporary loss of habitat. Species, such as American peregrine falcon, brown pelican, and mountain lion, that are much more mobile and typically exhibit broader ranges would likely avoid the area or move into adjacent habitat during decommissioning activities. As part of the Proposed Project, PG&E has developed a Discharge Structure Demolition and Restoration Plan (see Table 2-2) that would be implemented for the terrestrial area temporarily disturbed during the removal of the Discharge Structure. This plan includes requirements for topsoil salvage and replanting of the approximately 0.14 acre of coastal bluff scrub habitat (see Table 4.3-6) that comprises much of the terrestrial portion of the Discharge Structure restoration area.

Direct impacts to special-status wildlife would occur if individual animals are injured or killed from crushing, trampling, or entrapment or if eggs, nests, burrows, dens, or roosting sites are destroyed. Animals would be most susceptible to crushing by heavy equipment during vegetation removal and grading activities. Smaller, less mobile animals could also be trampled by foot traffic if present in work areas. Due to the cryptic nature of some species, such as Morro shoulderband snail or legless lizard, detection is often difficult, particularly during periods of inactivity. Similarly, Crotch's bumble bee overwintering sites, which may occur just a few centimeters below the surface of the ground, may be difficult to detect. California red-legged frogs can be found foraging in upland areas and could occur almost anywhere within the DCPP site. The potential to encounter California red-legged frogs and other special-status amphibians, if present, increases during rain events, at night, or in cool weather. It is during periods spent in upland habitats that these species would be most vulnerable to crushing or trampling. Larger and more mobile species, such as mountain lion, would be expected to disperse into adjacent habitat and impacts from crushing would be unlikely. Some animals may also be subject to injury or mortality from entrapment if open excavations or trenches are left exposed or uncovered.

Small to mid-sized burrows, used for refuge, cover, nesting, and rearing of young, are an essential habitat element for some special-status wildlife species, such as California red-legged frog, western pond turtle, burrowing owl, and American badger. Direct impacts would occur if burrows or dens used by these species are destroyed or removed, resulting in the mortality of individuals or destruction of eggs, if present. Direct impacts would also occur if the nests or eggs of special-status birds are damaged or destroyed during Phase 1 activities, such as tree trimming along the access road to the SE Borrow Site. Special-status bats could establish roosting sites in developed structures or dense woodlands at the DCPP site, which would result in direct impacts if subject to mortality or destruction of roosting sites during building demolition and road expansion activities.

To address potential injury and mortality to wildlife, and the destruction of nests, eggs, burrows, and dens, the Proposed Project includes limiting disturbance to the smallest possible area, restricting vehicles and heavy equipment to clearly defined work boundaries, maintaining speed limits on access roads, utilizing existing roads to the maximum extent feasible, and installing escape ramps in open excavations (AC BIO-4, *Site Maintenance and General Operations*, and AC BIO-5, *General Wildlife Protection*).

Vegetation clearing and grading in undeveloped work areas and demolition of existing facilities could result in the off-site transport of sediment and sediment-laden water into Diablo Creek or other aquatic features in or adjacent to the DCPP site. Similarly, removal of the above and below ground water conveyance system, culverts, and discharge points would disturb soils and increase the risk of erosion. The risk of erosion and transport of materials from the DCPP site would increase during rain events. Soil disturbance resulting in sedimentation has been directly implicated in lethal and sublethal effects on amphibians (Maxell and Hokit, 1999). Direct impacts would occur if special-status amphibians and other aquatic species, such as steelhead, western pond turtle, and two-striped garter snake are exposed to increased levels of sediment or if aquatic habitat is degraded from sediment-laden runoff from work areas. PG&E would be required to comply with the conditions of Section 23.07.174 (Streams and Riparian Vegetation) of the San Luis Obispo County Code throughout all Phase 1 activities. This would include implementing appropriate minimum setbacks along Diablo Creek and other riparian ESHAs and avoiding prohibited activities within these setbacks. There are facilities within the existing DCPP site that are currently located within defined setbacks along Diablo Creek and other upland areas. To address encroachments within these setbacks associated with decommissioning activities and new infrastructure (i.e., new GTCC Waste Storage Facility, indoor Firing Range, Security Building, and Storage Building), required training and monitoring measures discussed below would include conditions to establish and maintain appropriate setback buffers. PG&E has included several plans in the Project Description to limit erosion and control sources of contaminants. These plans include a construction-specific Stormwater Pollution Prevention Plan (SWPPP) (AC BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*). The SWPPP would contain Best Management Practices (BMPs) designed to minimize erosion and control sediment during decommissioning activities. The Proposed Project also includes the implementation of a Preliminary Erosion and Sediment Control Plan that identifies BMPs, such as perimeter controls (e.g., silt fencing and fiber rolls) and hydroseeding, to control erosion and sedimentation from the DCPP site during grading and restoration activities (PG&E, 2020b).

Improperly stored or used hazardous materials, such as petroleum products and concrete waste would result in direct impacts to special-status wildlife if exposure results in injury or death, the degradation of aquatic habitat, or the abandonment of microsites, burrows, dens, or other habitat features. This would be particularly applicable to highly sensitive species, such as southwestern pond turtle since their broad diet and long-life span are conducive to accumulating large amounts of contaminants (Holland, 1991). Special-status mammals would be directly impacted if injured or killed from interactions with accidentally spilled or improperly contained hazardous materials, including lead ingestion at the existing Firing Range. Interaction could come from direct ingestion or contact or through secondary exposure from consuming contaminated forage or prey items.

The SWPPP (AC BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*) would require site-specific BMPs to reduce or prevent the accidental release of hazardous materials and other pollutants. These would include designating areas for refueling or washing equipment, the use of secondary containment (i.e., drip pans), and requiring spill control kits be kept on-site. In addition to the SWPPP, the development and implementation of a SPCC Plan would be required by 40 CFR 112 (see Table 2-2). The SPCC Plan would address countermeasures to contain and cleanup an accidental release of oil and oil-based products. Additionally, as part of the Proposed Project work limits and staging areas would be delineated, designated washing and fueling areas away from sensitive biological resource areas identified, and routine inspections of equipment for leaks would be conducted (AC BIO-4, *Site Maintenance and General Operations*).

Direct impacts would occur if special-status animals are exposed to fugitive dust that results in adverse physiological effects or if excess levels of dust and construction noise lead to abandonment of nests, dens, roosts, or territories. PG&E would minimize fugitive dust and construction noise by watering active demolition and disturbed soil areas to suppress dust and utilizing equipment with low noise design (AC AQ-1, *Minimize Fugitive Dust,* and AC NOI-2, *Reduce Construction Noise*).

Some wildlife species are highly susceptible to interactions with humans due to transmissible diseases. For example, chytrid fungus is believed to be a leading cause in the decline of native amphibian populations worldwide and affects more than 700 species on all continents where amphibians occur (Lips, 2016). The fungus is transferred by direct contact between frogs and tadpoles or via zoospores in infected water. Humans can spread the disease through contaminated gear and equipment. Similarly, white-nose syndrome is a disease that affects hibernating bats and is caused by the fungus *Pseudogymnoascus destructans* (or *Pd*) according to the White-Nose Syndrome Response Team (WNSRT) (WNSRT, 2021). *Pd* grows in cold, dark places and attacks the bare skin of hibernating bats. As it grows, the fungus causes changes in bats that make them become active more than usual resulting in burning fat reserves needed to survive the winter. *Pd* spores can last a long time on surfaces including clothes, shoes, and outdoor gear. So, even though humans do not get white-nose syndrome, they can unknowingly transfer the fungus from one place to another. Although currently, white-nose syndrome appears to be limited in California to detections near the town of Chester in Plumas County (WNSRT, 2021). Direct impacts to special-status amphibians and bats could occur if transmissible fungal diseases are introduced into the Project area via contaminated gear and equipment.

The introduction and spread of invasive plants and wildlife would indirectly impact special-status wildlife by displacing native vegetation, degrading aquatic and upland habitat quality, altering soil characteristics, and modifying prey selection or reducing prey abundance. Such impacts could be associated with the transport of weed seeds or plant parts on vehicles and equipment from outside areas into the Project area. The Proposed Project includes washing all vehicles and equipment prior to entering work areas and utilizing materials that are certified weed-free, to address the potential the introduction and spread of transmissible fungal diseases or noxious and invasive species (AC BIO-8, *Noxious Weed Prevention*).

Indirect impacts could also occur if the upgraded or new septic system associated with the East Canyon Area were to fail resulting in leaching of materials, such as nitrogen and potassium, that

provide nutrients and promote soil conditions conducive to the spread of invasive and noxious weeds. For example, weeds are adapted to rapidly take up the nutrients that are released in organic matter and many germinate in response to the presence of nitrate which is used as a cue to indicate the absence of competition (Cornell University, 2018). However, because any upgrades would improve the existing system, which has been in use since circa 1968, the potential risk of failure would be substantially reduced relative to current conditions. Further, the installation of a new system would result in even a greater reduction of potential risks associated with failure of the system. Although the risks relative to current conditions would be reduced, indirect impacts as a result of failure of the septic system could also include degradation of water quality for California red-legged frog, western pond turtle, and other aquatic wildlife species. Generally, properly installed, sited, and maintained septic systems should not adversely affect water quality. If a failure of the system results in a discharge directly into surface waters, increased levels of nitrogen and phosphorus could cause algal blooms (USEPA, 2022). An overgrowth of algae can consume oxygen and block sunlight, resulting in mortality to aquatic organisms. Any upgrades to the existing septic system, or installation of a new system, would be implemented to ensure consistency with County ordinances related to sewage disposal systems and wastewater management (e.g., Titles 19 and 22), including setbacks from surface waters.

Ongoing grading activities would result in indirect impacts if the hydrology of the site is altered in such a way as to adversely affect special-status aquatic wildlife due to increased long-term erosion and sedimentation, altered on-site drainage patterns, or additional runoff that would exceed capacity of stormwater conveyance. As part of the Proposed Project's site restoration and pursuant to Section 23.05.042 (Drainage Plan Required) of the San Luis Obispo County Code, a SWMP would be prepared prior to the issuance of any grading or building permits (see Section 2.4.5, *Long-Term Stormwater Management*). The SWMP would require management of stormwater drainage from the site over the period of time for vegetation to establish and to minimize potential sediment impacts to adjacent habitat for special-status wildlife. Due to the long-term nature of the Proposed Project, there is the potential that existing regulatory requirements may be modified, or new designations may be assigned to wildlife species that are present or could potentially occur at the DCPP site. Indirect impacts could occur if these wildlife species receive new or additional protections that are not currently addressed within the context of this analysis.

Impacts to special-status wildlife would be significant without mitigation. The implementation of MM AQ-1 (*Implement a Decommissioning Activity Management Plan [DAMP]*), MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), MM BIO-2 (*Prepare and Implement a Habitat Restoration and Revegetation Plan*), MM BIO-3 (*Implement Oak and Native Mature Tree Protection Measures*), MM BIO-4 (*Prepare and Implement a Weed Management Plan*), MM BIO-5 (*Prepare and Implement a Biological Resources Adaptive Management Plan*), MM EM-2 (Project *Plan Updating, Tracking, and Reporting,* specifically for the DAMP required under MM AQ-1, Habitat Restoration and Revegetation Plan required under MM BIO-2, Weed Management Plan required under MM BIO-4, Biological Resources Adaptive Management Plan required under MM BIO-5, Drainage Plans required under MM HWQ-1, Nesting Bird Management Plan required under MM BIO-7, and Long-Term Erosion and Sediment Control Plan required under MM HWQ-1), and MM HWQ-1 (*Prepare and Implement Drainage Plans*) would be required to reduce impacts. These measures include a County-approved worker

training program, habitat restoration and revegetation, oak and native tree protection, weed and dust control, the implementation of a Construction Drainage Plan, and tracking and enforcement of plans that are included as part of the Proposed Project. They would also account for the potential for new or modified regulations associated with special-status wildlife species throughout implementation of the Proposed Project.

The implementation of the following mitigation measures would also be required: MM BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*), MM BIO-9 (*Conduct Biological Monitoring and Reporting*), MM BIO-10 (*Implement Wildlife Impact Avoidance and Minimization Measures*), MM BIO-11 (*Conduct Protocol-Level Surveys for Morro Shoulderband Snail and Implement Avoidance Measures*), MM BIO-12 (*Conduct Visual Presence/Absence Surveys for Crotch's Bumble Bee and Implement Avoidance Measures*), MM BIO-14 (*Conduct Preconstruction Surveys for Special-Status Herpetofauna and Implement Avoidance Measures*), MM BIO-15 (*Install and Maintain California Red-Legged Frog Exclusion Fencing*), MM BIO-16 (*Conduct Clearance Surveys and Monitoring for California Red-Legged Frog*), MM BIO-17 (*Conduct Preconstruction Surveys for Overwintering Burrowing Owl and Implement Avoidance Measures*), MM BIO-18 (*Conduct Preconstruction Surveys for San Diego Desert Woodrat Middens and Implement Avoidance Measures*), MM BIO-19 (*Conduct Preconstruction Surveys for American Badger and Ringtail Dens and Implement Avoidance Measures*), and MM BIO-20 (*Conduct Preconstruction Surveys for Roosting Bats and Implement Avoidance Measures*). These measures include specific preconstruction surveys for special-status nesting birds and herpetofauna, Morro shoulderband snail, Crotch's bumble bee, burrowing owl, San Diego desert woodrat middens, American badger and ringtail dens, and special-status bat roosting sites. They also include the establishment of avoidance buffers, biological monitoring, installation of exclusion fencing, and implementation of general wildlife protection measures, among other requirements. Implementation of the above measures would be required to ensure that impacts to special-status wildlife at the DCPP site are reduced to less than significant (Class II).

Railyards

Pismo Beach Railyard. Although primarily developed, the PBR site supports patches of native vegetation communities, including oak woodlands, scrub habitat, and wetland features that could provide potential habitat for special-status wildlife, such as monarch butterfly, California red-legged frog, and San Diego desert woodrat, among other (see Appendix E2, *Regional Special Status Species Tables*). Decommissioning activities at the PBR site would occur within developed areas and no vegetation removal activities or tree trimming would be required. Therefore, direct impacts from the temporary loss of habitat for special-status wildlife species would not occur.

Direct impacts to special-status wildlife would occur if individual animals are injured or killed from crushing, trampling, or entrapment or if eggs, nests, burrows, dens, or roosting sites are destroyed. Although the potential risk from crushing by heavy equipment during ground-disturbing activities would not apply at the PBR site, special-status animals could still be crushed or trampled if entering work areas during loading and unloading activities. Smaller, less mobile animals, such as California red-legged frog or coast horned lizard, would be the most vulnerable to injury or mortality from crushing while mobile species, including special-status birds and larger mammals would be expected to move away from work areas or avoid these areas during

operations. Because vegetation removal, tree trimming, grading, and building demolition activities would not be performed at the PBR site, the destruction of eggs, nests, burrows, dens, and roosting sites are unlikely to occur. However, the Proposed Project would include clearly defined work areas to restrict access of vehicles and heavy equipment outside of those areas (AC BIO-4, *Site Maintenance and General Operations*).

Direct impacts could occur if potential aquatic habitat for special-status species, including steelhead, California red-legged frog, and western pond turtle, along Pismo Creek is degraded from increased offsite transport of sediment and sediment-laden runoff. Increased levels of dust and noise from deliveries and railcar loading could result in direct impacts to special-status wildlife, such as monarch butterfly, burrowing owl, or special-status bats, if occupied burrows, dens, or roosting sites are abandoned during Phase 1 activities. The majority of the PBR site is covered by impervious surfaces and this would not change during decommissioning activities. Therefore, erosion, sedimentation, and dust control would continue to be managed as it is under existing conditions and impacts would not occur. Impacts from increased levels of noise generated during operations at the PBR site are not anticipated to substantially exceed current operations.

Activities at the PBR site would involve vehicles, loading equipment, and railcars that utilize hazardous materials (e.g., motor oil, diesel fuel, hydraulic fluid) that could directly impact special-status wildlife if individual animals are injured or killed from ingestion or contact with these materials. Further, the accidental release of these materials would result in direct impacts if they were to enter and degrade suitable aquatic habitat for special-status wildlife along the adjacent Pismo Creek riparian corridor. PG&E would limit vehicles and heavy equipment to defined work boundaries, utilize previously disturbed areas for equipment storage and staging, maintain speed limits on access roads, delineate sensitive resource areas and establish avoidance buffers, employ secondary containment, and conduct daily inspections of construction equipment for leaks (AC BIO-4, *Site Maintenance and General Operations,* and AC BIO-5, *General Wildlife Protection*).

The introduction and spread of invasive plants and wildlife would indirectly impact special-status wildlife by displacing native vegetation, degrading aquatic and upland habitat quality, altering soil characteristics, and modifying prey selection or reducing prey abundance. As part of the Proposed Project, PG&E would limit the introduction and spread of noxious weeds into the Project area by requiring cleaning of all vehicles and equipment (AC BIO-8, *Noxious Weed Prevention*).

Impacts at the PBR site would be significant without mitigation. The implementation of the following mitigation measures would be required: MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), MM BIO-7 (*Prepare and Implement a Nesting Bird Management Plan*), MM BIO-9 (*Conduct Biological Monitoring and Reporting*), MM BIO-10 (*Implement Wildlife Impact Avoidance and Minimization Measures*), MM BIO-13 (*Conduct Roosting Site Surveys for Monarch Butterfly and Implement Avoidance Measures*), MM BIO-14 (*Conduct Preconstruction Surveys for Special-Status Herpetofauna and Implement Avoidance Measures*), MM BIO-15 (*Install and Maintain California Red-Legged Frog Exclusion Fencing*), MM BIO-16 (*Conduct Clearance Surveys and Monitoring for California Red-Legged Frog*), MM BIO-17 (*Conduct Preconstruction Surveys for Overwintering Burrowing Owl and Implement Avoidance*

Measures), MM BIO-18 (*Conduct Preconstruction Surveys for San Diego Desert Woodrat Middens and Implement Avoidance Measures*), and MM BIO-20 (*Conduct Surveys for Roosting Bats and Implement Avoidance Measures*). These mitigation measures include a County-approved worker training program, biological monitoring, installation of exclusion fencing, and implementation of general wildlife protection measures. They also include specific preconstruction survey requirements for special-status nesting birds and herpetofauna, burrowing owl, San Diego desert woodrat, and bat roosting sites. Implementation of the above measures would be required to ensure that impacts to special-status wildlife at the PBR site are reduced to less than significant (Class II).

SMVR-SB. Direct and indirect impacts to special-status wildlife at the SMVR-SB site would be the same as those discussed for the PBR site.

Impacts would be significant without mitigation. The implementation of the same mitigation measures discussed for the PBR site would be required to ensure that impacts are reduced to less than significant (Class II).

Phase 2

During Phase 2, grading/fill activities would primarily focus on backfilling voids created by the demolition of DCPP structures and restoring the DCPP site to a natural condition that promotes positive drainage. The process of removing the Discharge Structure and completing associated restoration would continue during Phase 2 (see Phase 1 discussion).

Direct impacts to special-status wildlife at the DCPP site would be similar in type to those described for Phase 1 (see Phase 1 discussion). However, impacts from the temporary loss of habitat would be substantially reduced during Phase 2 since the majority of ground-disturbance, tree trimming, and demolition work would be completed. If any clearing of previously undisturbed areas is required, topsoil would be removed and stockpiled. For Phase 2, PG&E would also prepare a Revegetation Plan as part of the Proposed Project (see Section 2.4.4, *Grading and Landscaping [Final Site Restoration]*) that would apply to all temporary disturbance areas and the demolition zone. Upon completion of grading to natural contours, areas would be revegetated to establish native vegetation that is consistent suitable habitat for special-status wildlife known to occur in the Project area. No activities would be conducted in Diablo Creek during Phase 2. Therefore, direct impacts from the loss of aquatic habitat for special-status aquatic species, such as steelhead, California red-legged frog, and western pond turtle, would not occur.

Direct impacts from injury or crushing of special-status animals due to mechanical crushing or trampling or the destruction of eggs, nests, burrows, dens, or roosting sites would be similar to those discussed for Phase 1 at the DCPP site but would be reduced in magnitude since the majority of ground-disturbance, tree trimming, and building demolition would have been completed.

The most likely risks to special-status wildlife during Phase 2 activities would be exposure to increased sediment and sediment-laden water should runoff from work areas enter Diablo Creek. Direct impacts from exposure to sediment for aquatic species, such as steelhead and California red-legged frog, would be increased in magnitude during Phase 2 activities as the

majority of hardscape features at the DCPP site would be removed resulting in a greater level of exposed soils. Due to a greater level of exposed soils, direct impacts from the exposure to fugitive dust that results in adverse physiological effects, or the abandonment of nests, dens, roosts, or other territories would also be increased in magnitude during Phase 2. The use of vehicles and equipment during Phase 2 would continue to result in the potential for the accidental release or improper containment of hazardous materials. Direct impacts to special-status wildlife from exposure to these materials during Phase 2 would be the same as those discussed for the DCPP site during Phase 1. PG&E would minimize erosion, fugitive dust, and release of hazardous materials, during Phase 2, as described in the Project Description (AC AQ-1, *Minimize Fugitive Dust*; AC BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*; and AC BIO-4, *Site Maintenance and General Operations*).

Indirect impacts associated with the introduction and spread of fungal diseases, such as chytrid or *Pd* would be similar in type and magnitude to those discussed under Phase 1. The level of exposed soils occurring at the DCPP site during Phase 2 would increase the potential for the introduction and spread of noxious and invasive weeds that could result in habitat degradation for special-status wildlife. Indirect impacts would occur if noxious and invasive species are introduced or spread into the DCPP site or adjacent habitat during Phase 2 activities. The Proposed Project includes washing all vehicles and equipment prior to entering work areas and utilizing materials that are certified weed-free, to address the potential the introduction and spread of transmissible fungal diseases or noxious and invasive species (AC BIO-8, *Noxious Weed Prevention*).

Indirect impacts during Phase 2 would also occur if ongoing grading activities result in increased long-term erosion and sedimentation or altered on-site drainage patterns that degrade water quality or habitat for special-status wildlife, particularly aquatic species utilizing Diablo Creek. As part of the Proposed Project's site restoration and pursuant to Section 23.05.042 (Drainage Plan Required) of the San Luis Obispo County Code, a SWMP would be prepared prior to the issuance of any grading or building permits (see Section 2.4.5, *Long-Term Stormwater Management*). The SWMP would require management of stormwater drainage from the site over the period of time for vegetation to establish and to minimize potential sediment impacts to adjacent habitat for special-status wildlife. Indirect impacts associated with potential changes to existing regulatory requirements or new designations for special-status plants would be similar to those discussed for the DCPP site under Phase 1.

Impacts would be significant without mitigation. Therefore, the same mitigation measures listed for Phase 1 activities at the DCPP site would be implemented. Additionally, MM HWQ-1 (*Prepare and Implement Drainage Plans*), which requires the preparation and implementation of a Post-Decommissioning Drainage Plan prior to initiating Phase 2 activities, and MM HWQ-2 (*Long-Term Erosion and Sediment Control Plan*), which would identify BMPs to control erosion and sedimentation from the site during grading and final site restoration activities, would be required. The implementation of these mitigation measures would ensure that impacts are reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. These activities would be conducted in fully developed areas that typically do not support suitable habitat for special-status wildlife. Some special-status bat species may utilize new facilities for roosting sites and could be subject to periodic increased noise and human presence. However, the only staff needed on site for these activities would be those required to monitor and protect the ISFSI and GTCC Waste Storage Facility, which would be minimal (not disclosed due to security). Peak staff during ISFSI/GTCC quarterly, annual, and 5-year operations would be less than 50 and would not exceed current operations at the DCPP site. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance with CAL FIRE/County requirements. These activities would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. Therefore, impacts would be less than significant, and no mitigation is required (Class III).

Future Actions. Once permitted by a third party, use of the Marina facilities would be limited to previously disturbed areas and would avoid activities within habitats that support special-status wildlife species. Although there would be no ground disturbance or tree trimming associated with future actions, members of the public would have uncontrolled access along the portion of Diablo Canyon Road between the Marina and the Avila Gate Guard House Facilities once the guard facilities are removed. It is possible that special-status wildlife could be directly impacted if individual animals are injured or killed from crushing by public vehicles using the Marina facilities or by trampling as the public would be allowed to explore the Marina area. Special-status wildlife could also be directly impacted if nests or eggs were to be destroyed or breeding behavior disrupted during public use. Indirect impacts could include the degradation of habitat for special-status as a result of the introduction of invasive and noxious weeds from offsite transport via vehicles and watercraft. Although the level of activity anticipated during third-party use of the Marina is not expected to exceed current operations at the DCPP, impacts to special-status wildlife would be significant without mitigation. Therefore, MM BIO-6 (*Install "No Entry" Signage at DCPP*), which includes restrictions for entering unauthorized areas during future actions, would ensure that impacts are reduced to less than significant (Class II).

Mitigation Measures for Impact BIO-6.

AQ-1 Implement a Decommissioning Activity Management Plan (DAMP) See Section 4.2.

BIO-1 Prepare and Implement a Worker Environmental Awareness Program (WEAP)

BIO-2 Prepare and Implement a Habitat Restoration and Revegetation Plan

BIO-3 Implement Oak and Native Mature Tree Protection Measures

BIO-4 Prepare and Implement a Weed Management Plan

BIO-5 Prepare and Implement a Biological Resources Adaptive Management Plan

BIO-6 Install "No Entry" Signage at DCPP

BIO-7 Prepare and Implement a Nesting Bird Management Plan

BIO-9 Conduct Biological Monitoring and Reporting. Prior to the submission of applications for any County Grading/Construction Permit, the following general biological monitoring requirements shall be implemented in addition to specific monitoring requirements identified under MM BIO-2, MM-BIO-7, and MM BIO-16. During Phase 1 and Phase 2, the Applicant or its designee shall employ a Biological Monitoring Team to oversee Project activities and to ensure compliance with mitigation measures, permit conditions, and plan requirements. General biological monitoring shall be conducted during all initial vegetation clearance, tree trimming, and grading activities at the DCPP site. Monitoring shall occur at least once weekly following completion of those activities throughout the duration of Phase 1 and Phase 2. General monitoring at the PBR and SMVR-SB sites shall occur at least once weekly throughout the duration of Phase 1 activities. General monitoring efforts shall be elevated from this schedule accordingly to cover any activity that may impact vegetation, wildlife, and sensitive biological resources.

The Biological Monitoring Team shall consist of:

Lead Biologist. No less than 60 days prior to the start of Phase 1 activities, the Applicant or its designee shall designate a Lead Biologist for the Project and submit their resume to the County of San Luis Obispo Planning and Building Department (County) for review and approval. The Lead Biologist shall, at a minimum, hold a bachelor's degree in biological sciences, zoology, botany, ecology, or a closely related field; have at least 3 years of experience in field biology or construction monitoring; show a demonstrable knowledge of the biological resources that are present or could be present in the Project area.

In general, the responsibilities of the Lead Biologist(s) shall include:

- Serving as the primary point for the County and regulatory agencies regarding biological resources mitigation and compliance.
- Preparing, conducting and/or overseeing Worker Environmental Awareness Program (WEAP) training (see MM BIO-1).
- Overseeing surveys for special-status species and ensuring that reporting requirements and timelines are met.
- Supervising Biological Monitors, including Restoration Monitors (see MM BIO-2), Avian Monitors (see MM BIO-7), and Red-Legged Frog Monitors (see MM BIO-16).
- Ensuring that proper biological monitoring coverage is maintained during all required Project activities.
- Immediately notifying the County in writing of dead or injured special-status species or any non-compliance with biological mitigation measures, permit conditions, or plan requirements.

- Conducting or overseeing bi-weekly site inspections during all Phase 1 and 2 activities at the DCPP site and communicating any remedial actions needed (i.e., trash, fencing repairs, weed maintenance, etc.) to maintain compliance with mitigation measures, permit conditions, and plan requirements.
- Providing written Weekly, Monthly, Quarterly, and Annual Biological Monitoring Reports to the County that shall, at a minimum, include a summary of Project activities at all Project sites, biological surveys and monitoring performed during the reporting period, special-status species observed, new active nest observations and active nest updates, any approved adjustments to nesting bird buffers, and non-compliance issues and remedial actions taken.

Biological Monitors. Prior to application for any County Grading/Construction/ Building Permits associated with any Phase 1 activities, County-approved Biological Monitor(s) shall be assigned by the Applicant or its designee to monitor Project activities. The Applicant or its designee shall provide the resumes of the proposed Biological Monitors to the County at least 30 days prior to the initiation of Phase 1 activities. Proposed Biological Monitors shall have a minimum of 2 years of experience in field biology or construction monitoring and demonstrated experience with the biological resources within the Project region.

The responsibilities of the Biological Monitors shall include:

- During monitoring duties, performing clearance surveys (sweeps) for sensitive biological resources that may be located within or adjacent to work areas prior to crews initiating work activities. If sensitive resources are observed, the Biological Monitor shall take appropriate actions as defined in the mitigation measures and permit conditions. Work activities shall not commence at any work area until the clearance survey has been completed and the Biological Monitor communicates to the contractor that work may begin.
- Conducting compliance monitoring during Project activities consistent with the timeline identified above.
- Ensuring that work activities are contained within approved disturbance area limits at all times, including setbacks defined under the County's Coastal Land Use Ordinance.
- Clearly delineating sensitive biological resources with staking, flagging, and signage, or other appropriate materials that are readily visible and durable. The Biological Monitors will inform work crews of these areas and the requirements for avoidance and will inspect these areas at appropriate intervals for compliance with mitigation measures and permit conditions.
- Routinely inspecting wildlife exclusionary fencing to ensure that it remains intact and functional. Any needs for fencing repairs shall be immediately communicated to the responsible party and repairs shall be completed in a timely manner, generally within 1 workday.

- Routinely inspecting work areas where animals may have become trapped or entangled, including equipment covered with bird deterrent netting (if any) and release any trapped or entangled animals. Inspections should also include high traffic areas, such as access roads and staging areas, to locate animals that are potentially in harm's way and relocate them, if necessary. Handling, relocation, release from entrapment, or other interactions with wildlife shall only be performed consistent with mitigation measure, permit conditions, and safety protocols unless otherwise authorized by CDFW and/or USFWS. Biological Monitors shall use handling measures that are safe, practicable, and consistent with mitigation measures and permit conditions to relocate (actively or passively) wildlife out of harm's way. If safety or other considerations prevent Biological Monitors from aiding trapped or entangled animals or animals in harm's way, the Lead Biologist shall be notified immediately. The Applicant or its designee, in coordination with the Lead Biologist, shall consult with CDFW and/or USFWS, a wildlife rehabilitator, or other appropriate party to obtain aid for the animal, consistent with applicable mitigation measures and permit conditions. If consultation with CDFW and/or USFWS is required, the County shall be notified within 1 day of the consultation.
- Maintaining the authority and responsibility to halt any Project activities that are not in compliance with applicable mitigation measures, permit conditions, or plan requirements or will have an unauthorized adverse effect on biological resources.
- At the end of each monitoring day, Biological Monitors shall verify that all excavations, open tanks, trenches, pits, or similar wildlife entrapment hazards have been adequately covered or have sufficient escape ramps installed to prevent wildlife entrapment and communicate with work crews to ensure covers or ramps are installed and functioning properly.
- Documenting monitoring activities on a daily basis, as performed to include location and description of activities monitored. The Biological Monitors shall prepare and submit all special-status species observations to the CNDDB within 30 days of the observation.

BIO-10 **Implement Wildlife Impact Avoidance and Minimization Measures.** Throughout all of Phase 1 and Phase 2 decommissioning activities at the DCPP, PBR, and SMVR-SB sites, the Applicant or its designee shall undertake the following measures to avoid or minimize impacts to wildlife resources:

- The Applicant or its designee will specify and enforce a maximum 15 mile per hour vehicle speed limit on any unpaved roads or work areas within the Project area. No Project-related pedestrian or vehicle traffic will be permitted outside of defined work area boundaries.
- Night lighting, when in use, shall be designed, installed, and maintained to prevent side casting of light towards surrounding wildlife habitat.
- Any soil bonding and weighting agents used for dust suppression on unpaved surfaces shall be non-toxic to plants and wildlife.

- To minimize disturbance to wildlife in surrounding habitat, unnecessary noise (e.g., loud radios, vehicle horns) shall be avoided.
- Potable and non-potable water sources, such as water buffalos and water truck tanks, shall be covered or otherwise secured to prevent animals (including birds) from entering. Water applied for dust abatement shall use the minimal amount needed to meet safety and air quality standards. Water sources (e.g., hydrants, J-stands) shall be checked periodically by biological monitors to ensure they are not creating open water sources due to leaking or consistently overfilling trucks.
- ***Trash.*** All trash, micro trash, and food-related waste shall be contained in vehicles or covered trash containers and removed from the site regularly.
- ***Worker guidelines.*** Workers shall not feed wildlife or bring pets to the Project area. Except for DCPP security and law enforcement personnel, no workers or visitors shall bring firearms or weapons into the Project area.
- ***Wildlife entrapment.*** Project-related excavations shall be secured to prevent wildlife entry and entrapment. Holes and trenches shall be backfilled, securely covered, or fenced. Excavations that cannot be fully secured shall incorporate appropriate wildlife exit ramp(s) at a slope of no more than a 3:1 ratio, or other means to allow trapped animals to escape. Biological monitors shall provide guidance to work crews to ensure that wildlife ramps or other means are sufficient to allow trapped animals to escape. A biological monitor shall inspect excavations for trapped wildlife routinely throughout the day and at the end of each workday.

  All pipes or other construction materials or supplies will be covered or capped in storage or laydown areas. No pipes or tubing will be left open either temporarily or permanently, except during use or installation. Any construction pipe, culvert, or other hollow materials will be inspected for wildlife before it is moved, buried, or capped.
- ***Dead wildlife.*** Dead animals of non-special-status species found within the Project area shall be reported to the appropriate local animal control agency within 24 hours. A biological monitor shall safely move the carcass out of the road or work areas as needed. Dead animals of special-status species found in the Project area shall be reported to CDFW, NMFS, and/or USFWS within one workday and the carcass handled as directed by the regulatory authority.
- ***Injured wildlife.*** PG&E shall create and implement guidelines for dealing with injured or entrapped wildlife found on or near the Project area. These guidelines shall be provided to all Project biological monitors. If an animal is entrapped or entangled, a qualified biological monitor shall free the animal if feasible, or work with decommissioning personnel to free the animal, in compliance with applicable safety regulations and Project requirements. If biological monitors cannot free the animal or the animal is too large or dangerous for monitors to handle, the Applicant or its designee shall contact and work with local animal control, CDFW, or other qualified parties to obtain assistance as soon as possible.

The Applicant or its designee shall ensure that one or more qualified biological monitors are properly trained (or receive training) in the safe and proper handling and transport of injured wildlife and are provided with the appropriate equipment. These trained and equipped monitors shall be available to capture and transport injured wildlife to a local wildlife rehabilitation center or veterinarian as needed. The Applicant shall bear the costs of any rehabilitation or veterinary treatment for any wildlife injured by Project-related activities. Any injured or entrapped special-status species found within or near the Project area shall be reported to the appropriate agencies within 1 workday.

BIO-11 **Conduct Protocol-Level Surveys for Morro Shoulderband Snail and Implement Avoidance Measures.** Prior to the submittal of applications for any County Construction or Grading permits related to any Phase 1 vegetation removal or grading activities in suitable habitat areas (e.g., microhabitat, sandy soil patches, material piles, leaf litter, etc.), the Applicant or its designee shall conduct protocol-level surveys for Morro shoulderband snail to determine presence or absence of the species at the DCPP site. Surveys shall be conducted by a qualified biologist approved by the County of San Luis Obispo Planning and Building Department (County) and shall be consistent with USFWS 2003 protocol survey guidelines for Morro shoulderband snail or the most recent guidelines (USFWS, 2003). The resume(s) of the proposed biologist(s) shall be submitted to the County for review and approval no more than 14 days prior to conducting surveys.

If the survey results are negative, no further action is required. If Morro shoulderband snails are discovered during surveys or during biological monitoring, a 50-foot avoidance buffer shall be established, and no activities shall be allowed. The Applicant or its designee shall notify the County in writing within 24 hours of any Morro shoulderband snail identified during surveys. The 50-foot buffer can be reduced depending on specific site conditions, location, and scheduled activities with the approval of the County in consultation with USFWS.

Within 14 days of completion of the surveys, the Applicant or its designee shall provide the County a report describing the findings, including the date, time, and duration of the survey; identity of the surveyor(s); a list of species observed; and electronic data identifying any snail observations and boundaries of established buffer zones.

BIO-12 **Conduct Visual Presence/Absence Surveys for Crotch's Bumble Bee and Implement Avoidance Measures.** Within 1 year prior to submittal of an application for a County Building permit related to any Phase 1 vegetation removal or grading activities within undeveloped portions of the DCPP site (i.e., areas outside the 142.86 acres with the "Developed" land cover type), the Applicant or its designee shall conduct visual surveys to determine the presence/absence of Crotch's bumble bee. The surveys shall be conducted by a County-approved qualified biologist(s) familiar with the species behavior and life history. The resume(s) of the proposed biologist(s) shall be submitted to the County of San Luis Obispo Planning and Building Department

(County) for review and approval no more than 14 days prior to conducting surveys. The following methodology shall apply unless CDFW releases specific survey protocols for the species. In this case, CDFW survey protocols shall be implemented. The surveys shall be conducted during the flying season (March 1 to September 1) when the species is most likely to be detected above ground and shall take place when temperatures are above 60°F, on sunny days with low wind speeds (e.g., less than 8 miles per hour) and at least 2 hours after sunrise and 3 hours before sunset. These methods may be varied in consultation with the County. Surveys shall focus on detection of foraging bumble bees and underground nests using visual aids such as butterfly binoculars.

Survey results, including negative findings, shall be submitted to the County prior to permit issuance for initiation of any Phase 1 vegetation removal or grading activities at the DCPP site. At a minimum, the survey results shall include the following:

- A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee.
- Field survey conditions that include name(s) of County-approved biologist(s); date and time of survey; survey duration; general weather conditions; survey goals; and species identified.
- A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where a nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of species).

If survey results are negative, no further actions are required. If Crotch's bumble bee nests/colonies (or potential Crotch's bumble bee nests/colonies) are determined to be present during surveys, the Applicant or its designee shall develop a plan in consultation with the County and in coordination with CDFW to protect the nest/colony site(s). No ground-disturbing activities shall be conducted until the plan has been approved by the County. At a minimum, the plan will include the following:

- Specifications for ground-disturbing activities and sequencing requirements (e.g., avoidance of raking, mowing, grading until late March to protect overwintering queens).
- Subsequent surveys conducted within 30 days and consistent with any current available CDFW standards prior to the start of vegetation removal or grading activities to identify active nests.
- Establishment of appropriate avoidance buffers for nest sites and monitoring by a qualified biologist(s) to ensure compliance. The extent of avoidance buffers shall be determined by the qualified biologist(s) in consultation with the County.
- Restrictions associated with construction practices, equipment use, or materials that may harm nesting/colony sites.

- Provisions to avoid Crotch's bumble bee individuals or nesting/colony sites (or potential Crotch's bumble bee individuals or nesting/colony sites) during decommissioning activities (e.g., ceasing activities until the animal has left the work area on its own volition or the nesting/colony site has been abandoned).

Any "take" of Crotch's bumble bee individuals or nest/colony sites will only be authorized through the context of the appropriate permits issued by CDFW.

BIO-13 **Conduct Roosting Site Surveys for Monarch Butterfly and Implement Avoidance Measures.** Prior to the commencement of any ground disturbance or site mobilization activities, the Applicant or its designee shall retain a qualified biologist approved by the County of San Luis Obispo Planning and Building Department (County) with demonstrated experience in monarch butterfly ecology and habitat to conduct overwintering site surveys at the PBR and SMVR-SB sites prior to the initiation of Project activities if those activities are scheduled to occur during the wintering season (November 1 through the first week of March). The resume(s) of the proposed biologist(s) shall be submitted to the County for review and approval no more than 14 days prior to conducting surveys. Surveys shall be conducted at each of the sites including a 300-foot buffer and shall include a minimum of two surveys performed at least one month (30 days) apart within the wintering season. Surveys shall be consistent with methods specified by the Xerces Society for Invertebrate Conservation (Xerces, 2022). Surveys shall be conducted annually until Phase 1 activities are completed. Within 14 days of completion of the surveys, the Applicant or its designee shall provide the County a report describing the findings, including the date, time, and duration of the survey; identity of the surveyor(s); a list of species observed; and electronic data identifying any overwintering sites and boundaries of established buffer zones.

If survey results are negative, no further action is required. If an active overwintering site is identified during surveys, Project activities can continue if the qualified biologist determines that activities would not affect the overwintering site. If the qualified biologist determines that there is a potential for Project activities to affect an active overwintering site, an avoidance buffer shall be established around the site and no activities shall be allowed within the buffer zone. The extent of the buffer zone shall be determined by the qualified biologist in consultation with the County. The avoidance buffer shall be maintained until the qualified biologist determines that the overwintering site is no longer active.

Any "take" of monarch butterfly individuals or roosting sites will only be authorized through the context of the appropriate permits issued by USFWS.

BIO-14 **Conduct Preconstruction Surveys for Special-Status Herpetofauna and Implement Avoidance Measures.** Prior to submittal of applications for any County permits related to any Project activities at the DCPP, PBR, or SMVR-SB sites, the Applicant or its designee shall retain a Qualified Biologist(s) to conduct surveys for special-status herpetofauna. The resume(s) of the proposed biologist(s) shall be submitted to the County of San Luis Obispo Planning and Building Department (County) for review and

approval no more than 14 days prior to conducting surveys. Surveys shall include all areas of suitable habitat within the limits of disturbance at the DCPP, PBR, and SMVR-SB sites with a 100-foot buffer where legal access is available. Focused surveys shall consist of a minimum of 3 daytime surveys and 1 nighttime survey within 1 week of building demolition, vegetation clearing, grading, or tree trimming at the DCPP site and within 1 week of any Project activities at the PBR and SMVR-SB sites. The survey schedule may be adjusted in coordination with the County to account for existing weather conditions. Within 14 days of completion of the surveys, the Applicant or its designee shall provide the County with a report describing the findings, including the date, time, and duration of the survey; identity of the surveyor(s); a list of species observed; and electronic data identifying any special-status herpetofauna observations and relocation efforts.

The Qualified Biologist(s) shall perform daily clearance surveys prior to initiating work activities and be present during all vegetation removal and grading activities conducted at the DCPP site within or immediately adjacent to suitable habitat for special-status herpetofauna.

Any terrestrial herpetofauna found within an area of disturbance or potentially affected by Project activities during surveys or monitoring shall be allowed to leave the area on its own volition or relocated to the nearest suitable habitat that will not be affected by Project activities. If California red-legged frogs are observed during surveys and/or monitoring, individuals will only be handled under the context of the appropriate permits issued by USFWS and CDFW (see MM BIO-16).

BIO-15 **Install and Maintain California Red-Legged Frog Exclusion Fencing.** The Applicant or its designee shall develop a California Red-Legged Frog Exclusionary Fencing Plan prior to applying for a County Construction/Grading or Building permit related to any Project activities at the DCPP, PBR, or SMVR-SB sites. The plan must be submitted to the County of San Luis Obispo Planning and Building Department (County) for approval no less than 60 days prior to the initiation of any Project activities. The intent of the plan is to minimize the potential for California red-legged frogs to enter work areas. The plan shall include, at a minimum, areas identified for installation of fencing that most effectively exclude dispersing frogs and other special-status amphibians from work areas (including maps), a schedule for installation, the type of fence to be installed, installation methods, maintenance contingencies, and monitoring and inspection requirements.

At a minimum, areas that require fencing shall include all work area interfaces with Diablo Creek and Pismo Creek (including the north and east boundaries of the 500 kV switchyard and the northern boundary of the 230 kV switchyard) and the SE Borrow Site and associated access road.

Exclusion fencing shall consist of materials approved by the County in coordination with USFWS and CDFW. The fencing shall be buried along the bottom margin for 4 inches into the ground or shall be landscaped stapled with 7-inch staples every 3 inches along the bottom of the fence if soil conditions are not suitable to bury the

fencing. Alternatively, the fencing must be secured by other means to prevent animal passage through the fence and into work areas. The fencing will include passage or escape doors to allow any animals trapped within the fence line to escape. Any alternative methods for securing the fencing must be approved by the County prior to installation. The above-ground fencing shall be a minimum of 3 feet in height above the surface and anchored to non-corrosive metal T-posts that are installed a minimum of every 8 feet along the entire length of fencing. The top of the fencing shall be bent over in a semi-circle facing outwards to ensure that the fence cannot be climbed.

Exclusion fencing shall be routinely inspected by a County-approved Qualified Biologist and maintained throughout the duration of Phase 1 activities for the DCPP, PBR, and SMVR-SB sites, and throughout the duration of Phase 2 activities at the DCPP site.

BIO-16 **Conduct Clearance Surveys and Monitoring for California Red-Legged Frog.** At least 15 days prior to the onset of any Project activities or issuance/Notice to Proceed for any construction permits at the DCPP, PBR, and SMVR-SB sites, the Applicant or its designee shall submit the names and credentials of qualified biologist(s) who would conduct clearance surveys and monitoring conditions identified below to the County of San Luis Obispo Planning and Building Department (County) for review and approval.

Identify Reception Sites. Prior to the onset of any Project activities at the DCPP, PBR, and SMVR-SB sites, the County-approved biologist(s) must identify appropriate areas to receive red-legged frog adults and tadpoles relocated from Project sites. These areas must be in proximity to the capture site, contain suitable habitat, and not be affected by Project activities to the best of the County-approved biologist's knowledge. A map that identifies these areas shall be submitted to the County prior to any relocation efforts.

Clearance Surveys. Upon completion of exclusion fence installation required under MM BIO-16 and within 1 week of any Project activities at the DCPP, PBR, and SMVR-SB sites, a qualified biologist shall conduct clearance surveys for California red-legged frog. The surveys shall include 3 nighttime surveys with one of these surveys conducted within 24 hours of Project activities at each of the sites. The surveys shall be conducted by walking fence perimeters and meandering transects in suitable riparian and upland habitats within and immediately adjacent to the Project sites while using low-intensity flashlights to detect eye shine.

Within 14 days of completion of the final survey, the Applicant or its designee shall provide the County with a report describing the findings, including the dates, time and duration of the surveys; identity of the surveyor(s); weather conditions; electronic data identifying any red-legged frogs or other special-status herpetofauna observed and/or relocated; and a list of other species observed.

Monitoring. A County-approved biologist(s) shall be present during all Phase 1 and Phase 2 ground-disturbing activities at the DCPP site and shall perform weekly inspections of the PBR and SMVR-SB sites during Phase 1 activities and of the DCPP site upon completion of ground-disturbing activities. The County-approved biologist(s) shall have the authority to halt any action that might result in direct injury or mortality to individual frogs or tadpoles. If a work stoppage occurs, the County will be notified immediately by the County-approved biologist.

Handling and Relocation. If individual California red-legged frogs are identified during surveys and/or monitoring, they would only be handled through the context of the appropriate permits issued by USFWS and CDFW. Frogs found during surveys and/or monitoring shall be relocated by the County-approved biologist(s) to the predetermined reception site nearest the observation. If relocation is required during biological monitoring, the County-approved biologist(s) shall be allowed sufficient time to relocate frogs before Project activities are allowed to resume. The County-approved biologist(s) must maintain detailed records of any individuals that are relocated (e.g., size, coloration, any distinguishing features) with photographs and maps to assist in determining whether the relocated individuals are returning to the point of capture.

BIO-17 **Conduct Preconstruction Surveys for Overwintering Burrowing Owl and Implement Avoidance Measures.** The Applicant or its designee shall retain a qualified biologist with demonstrated experience in burrowing owl ecology to conduct pre-construction surveys for burrowing owl no more than 15 days prior to any construction permit Notice-to-Proceed or initiation of any Project activities at the DCPP, PBR, and SMVR-SB sites. Surveys shall conform to protocols established in the CDFW 2012 Staff Report on Burrowing Owl Mitigation (CDFW, 2012). Within 14 days of completion of the final (4 of 4) survey, the Applicant or its designee shall provide the County of San Luis Obispo Planning and Building Department (County) a report describing the findings. The report shall follow the guidelines provided in Appendix D of the CDFW 2012 Staff Report.

The Applicant or its designee shall take measures to avoid impacts to any active burrowing owl burrow within or adjacent to a work area by implementing buffer areas around the burrow where no construction activities will take place. The size of the buffer will be adequate to avoid impacts to the burrow and the occupying burrowing owl(s), eggs, and chicks, as determined by a qualified biologist. Buffers shall be 160 feet during the non-breeding season and 250 feet during the breeding season. The buffer will be staked and flagged. The prescribed buffers may be adjusted by the qualified avian biologist in coordination with the USFWS and/or CDFW based on existing conditions around the burrow, planned construction activities, tolerance of the species at a given location, and other pertinent factors.

Burrows that are verified as unoccupied by the Biologist may be made inaccessible to owls (e.g., by collapsing, covering, or other appropriate means). If active burrowing owl burrows are located within Project work areas, the Applicant or its

designee may passively relocate the owls, outside the nesting season only, by preparing and implementing a Burrowing Owl Passive Relocation Plan, as described below. In coordination with County and in consultation with CDFW and USFWS, the Applicant or its designee shall prepare a Burrowing Owl Passive Relocation Plan prior to the start of any ground-disturbing activities. No active relocation shall be permitted. No passive relocation of burrowing owls shall be permitted during the breeding season, unless a qualified biologist determines that an occupied burrow is not occupied by a mated pair, and only upon coordination with the CDFW and USFWS. The Plan shall include, but not be limited to, the following elements:

Assessment of Suitable Burrow Availability. The Plan shall include an inventory of existing, suitable, and unoccupied burrow sites within 500 feet of the affected Project work site. Suitable burrows will include ground squirrel or other burrows, cavities, pipes, or culverts that are deep enough to provide suitable burrowing owl nesting sites, as determined by the Biologist. If two or more suitable and unoccupied burrows are present in the area for each burrowing owl that will be passively relocated, then no replacement burrows will need to be built.

Replacement Burrows. For each burrowing owl that needs to be passively relocated, if fewer than two suitable unoccupied burrows are available within 300 feet of the affected Project work site, then the Applicant or its designee shall construct at least two replacement burrows within 300 feet of the affected Project work site. Burrow replacement sites shall be in areas of suitable habitat for burrowing owl nesting, and subject to minimal human disturbance and access. The Plan shall describe measures to ensure that burrow installation or improvements would not affect sensitive species habitat or any burrowing owls already present in the relocation area. The Plan shall provide guidelines for creation or enhancement of at least two natural or artificial burrows for each active burrow within the Project disturbance area, including a discussion of timing of burrow improvements, specific location of burrow installation, and burrow design. Design of the artificial burrows shall be consistent with CDFW guidelines (CDFG, 2012; or more current guidance as it becomes available) and shall be approved by the CDFW and USFWS.

Methods. Provide detailed methods and guidance for passive relocation of burrowing owls, outside the breeding season. An occupied burrow may not be disturbed during the nesting season (generally, but not limited to, February 1 to August 31), unless a qualified biologist determines, by non-invasive methods, that it is not occupied by a mated pair. Passive relocation would include installation of one-way doors on burrow entrances that would let owls out of the burrow but would not let them back in. Once owls have been passively relocated, burrows will be carefully excavated by hand and collapsed by, or under the direct supervision, of a qualified biologist.

Monitoring and Reporting. Describe monitoring and management of the replacement burrow site(s) and provide a reporting plan to document compliance. The objective shall be to manage the relocation area for the benefit of burrowing owls,

with the specific goal of maintaining the functionality of the burrows for a minimum of 2 years.

BIO-18 **Conduct Preconstruction Surveys for San Diego Desert Woodrat Middens and Implement Avoidance Measures.** No more than 3 days prior to County Notice-to-Proceed with initial ground-disturbing activities at the DCPP site, a qualified biologist shall conduct a survey to identify and flag woodrat middens. The survey area shall include all suitable habitat within the limits of disturbance plus a 25-foot buffer. If Project activities stop for one month or greater within an area that supports suitable habitat for San Diego desert woodrats, surveys shall be refreshed prior to work resuming in that area. Within 14 days of completion of survey, the Applicant or its designee shall provide the County of San Luis Obispo Planning and Building Department with a report describing the findings, including the date of the survey; identity of the surveyor(s); weather conditions; electronic data identifying any middens identified and relocation areas selected; methods for midden dismantlement and relocation; and a list of other species observed.

A 10-foot avoidance buffer shall be clearly delineated around any middens identified during the survey. Any middens that are determined to be unavoidable shall be mechanically dismantled (e.g., using an excavator with a thumb) slowly working from the top down under the supervision of the qualified biologist. The intent is to allow any woodrats to escape unharmed. Due to human health concerns associated with inhalation of dust and particles, no personnel shall assist in physically dismantling the midden (i.e., dismantling by hand will not be permitted) and supervision will be conducted upwind of dismantlement activities. If possible, materials that are dismantled will be mechanically relocated to suitable habitat outside of the immediate disturbance area to an area that will not be affected by Project activities.

Any remaining middens identified during surveys shall be monitored throughout all vegetation clearing and grading activities that occur within 25 feet. If woodrats are observed fleeing the midden, the qualified biologist(s) shall temporarily halt work until the animal has safely left the area of impact and/or are relocated to nearby suitable habitat by the qualified biologist. Any stoppage of work or relocation of woodrat individuals will be documented in daily monitoring reports.

BIO-19 **Conduct Preconstruction Surveys for American Badger and Ringtail Dens and Implement Avoidance Measures.** Prior to initiating any vegetation clearing or grading activities at the DCPP site, a County-approved biologist(s) shall conduct surveys for American badger and ringtail dens within 250 feet of limits of disturbance. The resume of the qualified biologist will be submitted to the County of San Luis Obispo Planning and Building Department (County) for approval prior to permit Notice-to-Proceed or initiating surveys. Surveys shall be conducted no more than 15 days prior to the initiation any vegetation removal or grading activities at the DCPP site. If present, occupied American badger and ringtail dens shall be flagged and vegetation removal or grading activities avoided within 100 feet of the occupied den. Natal dens shall be avoided during the whelping/pup rearing season for American

badger (February 15 through July 1) and ringtail (March 1 through June 30) and a minimum 250-foot buffer established. All occupied dens shall be flagged for avoidance, identified on construction maps, and a County-approved biological monitor shall be present during all Project activities.

Inactive Dens. Inactive dens that would be directly impacted during vegetation removal or grading activities at the DCPP site shall be excavated by hand or mechanized equipment under the direct supervision of a County-approved biologist(s) and backfilled to prevent reuse by badgers or ringtails. Potentially and known active dens shall not be disturbed during the whelping/pupping seasons identified above. A den may be declared "inactive" after 3 days of monitoring via camera(s) or a tracking medium have shown no American badger or ringtail activity.

Passive Relocation. If avoidance of a non-natal den is not feasible, badgers shall be passively relocated by slowly excavating the burrow (by hand or mechanized equipment under the direct supervision of the County-approved biologist), removing no more than 4 inches at a time. Passive relocation of badgers shall only occur before or after the whelping/pupping seasons identified above and only after notification and consultation with the County and CDFW. As a State fully protected species or ringtails cannot be passively relocated and must be allowed to leave the area on their own. Once the den is deemed empty, the cavity or burrow may be closed. A written report documenting any passive relocation events shall be provided to the County within 30 days of the event.

BIO-20 **Conduct Preconstruction Surveys for Roosting Bats and Implement Avoidance Measures.** Prior to Notice-to-Proceed or initiating any Project activities at the DCPP, PBR, or SMVR-SB sites, the Applicant or its designee shall retain a Qualified Biologist(s) to conduct surveys for roosting bats. The resume of the proposed biologist(s) shall be submitted to the County of San Luis Obispo Planning and Building Department (County) no more than 14 days prior to conducting surveys. Surveys shall be conducted no more than 14 days prior to building demolition, vegetation clearing, grading, or tree trimming at the DCPP site. Surveys at the PBR and SMVR-SB sites shall be conducted within 14 days of any Project activities. Additional surveys shall be conducted during the maternity season (1 March to 31 July) within 300 feet of Project activities. The County and CDFW shall be notified of any hibernacula or active roosting sites identified during surveys. If active maternity roosts or hibernacula are identified, the structure, tree, or other roosting medium shall be avoided (i.e., not removed), if feasible. If avoidance of the roosting site is not feasible, the Qualified Biologist will implement the following actions:

Maternity Roosts – If a maternity roost will be impacted by the Project, and no alternative maternity roosts are in use near the site, substitute roosting habitat for the maternity colony shall be provided on, or in proximity to, the Project site no less than three months prior to the eviction of the colony. Alternative roost sites shall be constructed in accordance with the specific bat species requirements in coordination

with the County and CDFW. Alternative roost sites must be of comparable size and proximal in location to the impacted colony.

Exclusion of Bats Prior to Eviction. If non-breeding bat hibernacula will be impacted by the Project, the individuals shall be safely evicted, under the direction of the Qualified Biologist, by opening the roosting area to allow airflow through the cavity or other means (e.g., one-way doors) determined by the Qualified Biologist. Any roost eviction that is required will be conducted in coordination with the County and CDFW. If one-way doors are utilized, a minimum of 1 week shall pass after doors are installed and temperatures shall be sufficiently warm for bats to exit the roost since bats do not typically leave their roost daily during winter months in coastal southern California. This action should allow all bats to leave during the course of 1 week. Roosts that need to be removed in situations where the use of one-way doors is not necessary or feasible in the judgement of the Qualified Biologist shall first be disturbed by various means under the direction of the Qualified Biologist at dusk to allow the bats to escape during the darker hours, and the roost shall be removed or Project activities in the area shall occur the following day (i.e., there shall be no less or more than 1 night between initial disturbance and Project activities). A written report documenting any relocation events shall be provided to the County within 30 days of the event.

EM-2 **Project Plan Updating, Tracking, and Reporting** See Section 3.

HWQ-1 **Prepare and Implement Drainage Plans** See Section 4.11.

HWQ-2 **Long-Term Erosion and Sediment Control Plan** See Section 4.11.

Impact BIO-7: Result in the permanent or temporary loss or disturbance to habitats identified as, or that may qualify as, an Environmentally Sensitive Habitat Area (ESHA) under Section 30000 et. seq. of the California Coastal Act of 1976 (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

The majority of the DCPP site is located within the Coastal Zone and habitats that meet the definition of ESHA under Section 30107.5 of the CCA and Title 23 of the County of San Luis Obispo's Coastal Zone Land Use Ordinance were documented. These include Mapped ESHAs and Unmapped ESHAs that have been categorized into Coastal Wetlands and Streams and Special-Status Plant Habitat (see Table 4.3-3 and Figure 4.3-4).

Phase 1 ground-disturbing activities would result in direct impacts from the temporary removal of approximately 0.06 acre of habitat within Coastal Stream and Wetland Unmapped ESHAs (see Table 4.3-3 and Figure 4.3-4). Within the limits of disturbance for the Proposed Project, these ESHAs are limited to ephemeral swales, erosional rills, and small drainages that do not support riparian habitat. Additionally, approximately 0.14 acre of vegetation within areas defined as Special-Status Plant Habitat ESHAs would occur during Phase 1 activities (see Table 4.3-3 and

Figure 4.3-4). These areas are associated with coastal bluff scrub habitat adjacent to the Discharge Structure and would be subject to direct impacts during the removal of the structure. As part of the Proposed Project, PG&E has developed a Discharge Structure Demolition and Restoration Plan that would be implemented during revegetation and restoration of the terrestrial area associated with the removal of the Discharge Structure during Phase 1 (see Table 2-2). This plan includes requirements for topsoil salvage and replanting for the terrestrial portion of the Discharge Structure restoration area which is primarily characterized as an ESHA.

The remaining direct and indirect impacts to ESHAs would be the same as those discussed for native vegetation under Impact BIO-1. These would include increased erosion and sedimentation, exposure to hazardous materials and fugitive dust, and degradation of habitat quality from the introduction of noxious and invasive species. As part of the Proposed Project, PG&E would be required to comply with provisions of the County's Coastal Zone Land Use Ordinance which include minimizing disturbance limits and implementing setbacks for development proposed within or adjacent to (within 100 feet of the boundary) an ESHA.

Impacts would be significant without mitigation. Therefore, the same mitigation measures listed for Phase 1 under Impact BIO-1, which include a County-approved worker training program, habitat restoration, and dust and weed control, and implementation of a Construction Drainage Plan, among other requirements, would be required. Implementation of these mitigation measures would ensure that impacts to ESHAs are reduced to less than significant (Class II).

Railyards

All railyard limits are outside of the Coastal Zone boundary with the exception of a small portion in the southwest corner of the PBR site. There were no ESHAs identified within this portion of the PBR site. Therefore, there would be no impacts to ESHAs at either of the railyard sites.

Phase 2

Direct and indirect impacts to ESHAs during Phase 2 would be similar to those discussed for Phase 1. However, direct impacts associated with the removal of vegetation would be substantially reduced in magnitude since the majority of vegetation removal and grading activities would occur during Phase 1. The process of removing the Discharge Structure and completing associated restoration would continue in Phase 2 (see Phase 1 discussion). If any clearing of previously undisturbed areas is required, topsoil would be removed and stockpiled. During Phase 2, PG&E would also prepare a Revegetation Plan as part of the Proposed Project (see Section 2.4.4, *Grading and Landscaping [Final Site Restoration]*) that would apply to all temporary disturbance areas and the demolition zone. Upon completion of grading to natural contours, areas would be revegetated to establish native vegetation that is consistent with adjacent plant communities and wildlife habitat.

The remaining direct and indirect impacts would be the same as those discussed for Phase 1. However, the potential for erosion and fugitive dust would likely increase during Phase 2 as the majority of hardscape features at the DCPP site would be removed resulting in a greater level of exposed soils. The greater level of exposed soils occurring at the DCPP site during Phase 2 would also increase the potential for indirect impacts from the introduction and spread of noxious and invasive weeds. PG&E would be required to continue implementing the conditions of the

County's Coastal Zone Land Use Ordinance for development proposed within or adjacent to an ESHA during Phase 2.

Impacts would be significant without mitigation. Therefore, the same mitigation measures discussed under Phase 1 would be required during Phase 2. Additionally, MM HWQ-1 (*Prepare and Implement Drainage Plans*), which requires the preparation and implementation of a Post-Decommissioning Drainage Plan prior to initiating Phase 2 activities, and MM HWQ-2 (*Long-Term Erosion and Sediment Control Plan*), which would identify BMPs to control erosion and sedimentation from the site during grading and final site restoration activities, would be required. EM-2 *(Project Plan Updating, Tracking, and Reporting,* specifically for Drainage Plans required under MM HWQ-1, the Long-Term Erosion and Sediment Control Plan required under MM HWQ-2, the Habitat Restoration and Revegetation Plan required under MM BIO-2, the Weed Management Plan required under MM BIO-4, the Biological Resources Adaptive Management Plan required under MM BIO-5, and the DAMP required under MM AQ-1) The implementation of these mitigation measures would ensure that impacts are reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance with CAL FIRE/County requirements. These activities would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. Further, there were no ESHAs identified immediately adjacent to the revised Owner-Controlled Area where fire prevention maintenance activities would primarily occur. Therefore, there would be no impacts, and no mitigation is required.

Future Actions. Upon the NRC's release of the Part 50 license, the Marina would be made available to a third-party for permitting and reuse for recreational, education, or commercial purposes and controlled access from the Avila Gate Guard House Facilities would no longer be implemented. Operations could include boating activities and use of the ancillary structures, parking lots, and public restroom facility. For analysis purposes, it is assumed that up to 200 persons could visit the Marina per day. Any third-party use of the Marina would be restricted to developed facilities within the Marina. However, since access to the facilities would be uncontrolled, direct impacts could occur if habitats supporting ESHAs are damaged or loss as a result of public use outside of the developed areas. Impacts to ESHAs would be significant without mitigation. Therefore, MM BIO-6 (*Install "No Entry" Signage at DCPP*), which includes restrictions for entering unauthorized areas during future actions, would ensure that impacts are reduced to less than significant (Class II).

Mitigation Measures for Impact BIO-7.

AQ-1 Implement a Decommissioning Activity Management Plan (DAMP) (see Section 4.2)

BIO-1 Prepare and Implement a Worker Environmental Awareness Program (WEAP)

BIO-2 Prepare and Implement a Habitat Restoration and Revegetation Plan

BIO-3 Implement Oak and Native Mature Tree Protection Measures

BIO-4 Prepare and Implement a Weed Management Plan

BIO-5 Prepare and Implement a Biological Resources Adaptive Management Plan

BIO-6 Install "No Entry" Signage at DCPP

EM-2 Project Plan Updating, Tracking, and Reporting See Section 3.

HWQ-1 Prepare and Implement Drainage Plans See Section 4.11.

HWQ-2 Long-Term Erosion and Sediment Control Plan See Section 4.11.

Impact BIO-8: Interfere with established wildlife migratory corridors or terrestrial wildlife nursery sites (Class III: Less than Significant).

Phase 1

DCPP Project Site

There are no known established wildlife migratory corridors or nursery sites that would be directly impacted by Phase 1 activities at the DCPP site. The DCPP site is located within a large Natural Landscape Block that extends from the Santa Ynez Mountains northward to Morro Bay (Spencer et al., 2010). The site is largely developed, fenced, and is currently non-contiguous with the large blocks of surrounding open terrestrial space that could support wildlife movement across the broader region. On a smaller scale, Diablo Creek provides a local movement corridor for wildlife movement between the Irish Hills and coastal habitats downstream. However, existing passage barriers, such as the Diablo Canyon Road crossing located within the DCPP site, limit movement for migratory fish, and likely some other small aquatic animals.

Direct impacts would occur during Phase 1 activities from the removal of native vegetation associated with the excavation of the SE Borrow Site and removal of the Discharge Structure. During Project activities, these work sites would likely be avoided by wildlife moving through the general area. However, ground-disturbance would be temporary and limited to discreet work sites. These activities would not create substantial barriers to general wildlife movement. It is likely that larger and more mobile species would use adjacent habitats to continue to move through the area. Phase 1 activities would not be performed within Diablo Creek so that area would remain available for wildlife moving between upland and coastal habitats in the area. Direct impacts would also occur if increased levels of noise, human presence, and fugitive dust result in disruption to natural wildlife movement patterns at and adjacent to the DCPP site. Indirect impacts would include the degradation of habitat from the introduction and spread of noxious and invasive weeds.

Phase 1 activities may temporarily limit terrestrial wildlife movement in the immediate area; however, existing barriers, including fencing and roads, currently limit movement in the area and the broader geographic range and habitat that occurs in the region would remain available to wildlife. Further, Diablo Creek would continue to provide a vital corridor for local wildlife movement. Therefore, the Project would not substantially interfere with the movement of any native resident or migratory fish, reptile, or amphibian species.

Impacts would be considered less than significant, and no mitigation is required (Class III).

Although no mitigation is required, the implementation of MMs BIO-1 through BIO-20 would further reduce impacts through habitat restoration, exclusion fencing, weed control, and avoidance measures, among other requirements.

Railyards

The PBR and SMVR-SB sites are primarily developed and are not contiguous with large blocks of open space. Roads, structures, agricultural fields, and other developed features currently limit use as a wildlife movement corridor in these areas. None of the railyard facilities occur within known established wildlife migratory corridors or nursery sites. Therefore, there would be no impact.

Phase 2

Impacts during Phase 2 would be similar to those discussed for Phase 1 (see Phase 1 discussion) but would be substantially reduced since the majority of vegetation removal and grading activities would have already been completed. Further, Phase 2 activities would include final site restoration and revegetation which would result in the establishment of additional native habitat that could be used by wildlife for movement in the area.

Impacts would be considered less than significant, and no mitigation is required (Class III).

The implementation of MMs BIO-1 through BIO-20 would further reduce impacts through habitat restoration, exclusion fencing, weed and dust control, and avoidance measures, among other requirements.

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. These activities would be conducted in fully developed areas that typically do not support adequate wildlife corridors or nursery sites for wildlife. Some bat species may utilize new facilities for roosting sites and could be subject to periodic increased noise and human presence. However, the only staff needed on site for these activities would be those required to monitor and protect the ISFSI and GTCC Waste Storage Facility, which would be minimal (not disclosed due to security). Peak staff during ISFSI/GTCC quarterly, annual, and 5-year operations would be less than 50 and would not exceed current operations at the DCPP site. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance with CAL FIRE/County requirements. These activities would be minimal and would

only be performed to maintain compliance with CAL FIRE and County regulations. Elevated levels of noise and human presence may result in some wildlife avoiding movement within and through the immediate area during fire maintenance activities. Since these activities would be periodic and temporary, it is likely that animals would return upon completion of any required tree trimming or brush removal. Therefore, impacts would be less than significant, and no mitigation is required (Class III).

Future Actions. Upon release of the Part 50 license, PG&E could lease and sublet (or other arrangement) the Marina to a third-party for recreational, educational, or commercial purposes. It is estimated that up to 200 persons could visit the Marina per day. From a terrestrial biological resources' perspective, any third-party use of the Marina would occur in previously developed areas and the level of activity would not exceed current operations at the DCPP site. As such, no impacts would occur, and no mitigation is required.

Mitigation Measures for Impact BIO-8. No mitigation is required.

Impact BIO-9: Result in the loss or disturbance to federal and State protected wetlands defined under Sections 401 and 404 of the Clean Water Act, the Porter-Cologne Water Quality Control Act, Section 30233 of the Coastal Act, Section 1600 et. Seq. of the California Fish and Game Code, or other jurisdictional habitats (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

The preliminary aquatics assessment identified a total of approximately 2.8 acres of non-wetland waters of the U.S. and 3.4 acres of non-wetland waters of the state in the DCPP survey area (see Table 4.3-4 and Figure 4.3-8. Additionally, approximately 5.69 acres of CDFW streambeds and 0.01 acre of CCC wetlands were identified (see Table 4.3-4 and Figure 4.3-8). These jurisdictional features include a portion of Diablo Creek and various ephemeral drainages, seeps, springs, and basins. As required by law, PG&E would comply with the regulations regarding conducting activities in water bodies under the jurisdiction of the relevant State and federal agencies. Therefore, PG&E would obtain permits pursuant to Section 401 and 404 of the CWA and the State Porter-Cologne Act and CDFG Code 1602-1605, as applicable.

Phase 1 decommissioning activities would result in approximately 0.8 acre, 1.1 acres, and 1.2 acres of temporary direct impacts to non-wetland waters of the U.S., non-wetland waters of the state, and CDFW streambeds respectively (see Table 4.3-4). These are comprised of features that occur within the limits of disturbance and would be subject to vegetation removal, grading, and demolition activities during Phase 1. Although meeting the requirements of the applicable jurisdictions, none of the features that would be directly impacted support riparian vegetation. The majority of direct impacts to jurisdictional features would be associated with the removal of the Discharge Structure (see Figure 4.3-8). As part of the Proposed Project, PG&E has developed a Discharge Structure Demolition and Restoration Plan that would be implemented during revegetation and restoration of the terrestrial area associated with the removal of the Discharge Structure during Phase 1 (see Table 2-2). This plan includes requirements for topsoil salvage and replanting for the terrestrial portion of the Discharge Structure restoration area.

Existing above and below ground stormwater conveyance structures would also be subject to direct impacts during demolition and grading activities. Disruption of the existing stormwater conveyance system could result in direct impacts if contributing to the degradation of water quality on the site. Small, earthen roadside ditches and ephemeral crossings would also be subject to temporary direct impacts during expansion of the access road to the SE Borrow Site and use of other Proposed Project access roads.

Phase 1 activities would also result in indirect impacts to approximately 2 acres of non-wetland waters of the U.S., 2.3 acres of non-wetland waters of the state, 0.01 acre of CCC wetlands, and 4.5 acres of CDFW streambeds (see Table 4.3-4). These include features that are located outside of the disturbance limits but within the 100-foot setback (survey buffer) surrounding the disturbance limits (see Figure 4.3-8. Indirect impacts would occur if sediment and sediment-laden waters or hazardous materials, such as petroleum products or concrete waste, are transported offsite and into Diablo Creek and other jurisdictional features. As part of the Proposed Project, PG&E would implement several plans (see Table 2-2) during Phase 1 activities to limit erosion and control sources of contaminants. These would include a construction-specific SWPPP (AC BIO-3, *Site-Specific Stormwater Pollution Prevention Plan*). The SWPPP would contain BMPs designed to minimize erosion and control offsite sediment transport during decommissioning activities. PG&E has also developed a Preliminary Erosion and Sediment Control Plan (PG&E, 2020b) that identified BMPs, such as perimeter controls (e.g., silt fencing and fiber rolls) and hydroseeding, to control erosion and sedimentation from the DCPP site during grading and restoration activities. The SWPPP would also require site-specific BMPs to reduce or prevent the accidental release of hazardous materials and other pollutants. These would include designating areas for refueling or washing equipment, the use of secondary containment (i.e., drip pans), and requiring spill control kits be kept on-site. In addition to the SWPPP, the development and implementation of the SPCC Plan would address countermeasures to contain, cleanup, and mitigate the effects of an accidental release of oil and oil-based products. As part of the Proposed Project, PG&E would also delineate work limits and staging areas, minimize disturbance, and conduct routine inspections of equipment for leaks (AC BIO-4, *Site Maintenance and General Operations*).

Indirect impacts to jurisdictional waters during Phase 1 activities would also occur if habitat is degraded due to the introduction and spread of nonnative invasive plant or wildlife species. The introduction and spread of invasive or noxious weeds can result in widespread and long-term indirect impacts by outcompeting and displacing native vegetation, particularly to fragile riparian communities. Weed infestations can also result in modifications to hydrological conditions and soil chemistry. The Proposed Project includes washing of all vehicles and equipment prior to entering work areas and utilizing materials that are certified weed-free, to reduce the introduction and spread of noxious and invasive weeds (AC BIO-8, *Noxious Weed Prevention*). Indirect impacts could also occur if the upgraded or new septic system associated with the East Canyon Area were to fail resulting in leaching of materials, such as nitrogen and potassium, that provide nutrients and promote soil conditions conducive to the spread of invasive and noxious weeds. For example, weeds are adapted to rapidly take up the nutrients that are released in organic matter and many germinate in response to the presence of nitrate which is used as a cue to indicate the absence of competition (Cornell University, 2018). However, because any upgrades would improve the existing system, which has been in use since

circa 1968, the potential risk of failure would be substantially reduced relative to current conditions. Further, the installation of a new system would result in even a greater reduction of potential risks associated with failure of the system. Although the risks relative to current conditions would be reduced, indirect impacts as a result of failure of the septic system could also include degradation of water quality. Generally, properly installed, sited, and maintained septic systems should not adversely affect water quality. If a failure of the system results in a discharge directly into surface waters, increased levels of nitrogen and phosphorus could cause algal blooms (USEPA, 2022). An overgrowth of algae can consume oxygen and block sunlight, resulting in mortality to fish and other aquatic organisms. Any upgrades to the existing septic system, or installation of a new system, would be implemented to ensure consistency with County ordinances related to sewage disposal systems and wastewater management (e.g., Titles 19 and 22), including setbacks from surface waters.

Impacts to Diablo Creek and other jurisdictional features would be considered significant without mitigation. The following mitigation measures are required to ensure that impacts are reduced to the extent feasible: MM BIO-1 (*Prepare and Implement a Worker Environmental Awareness Program [WEAP]*), MM BIO-2 (*Prepare and Implement a Habitat Restoration and Revegetation Plan*), MM BIO-4 (*Prepare and Implement a Weed Management Plan*), MM BIO-9 (*Conduct Biological Monitoring and Reporting*), MM EM-2 (*Project Plan Updating, Tracking, and Reporting,* specifically for Drainage Plans required under MM HWQ-1, the Long-Term Erosion and Sediment Control Plan required under MM HWQ-2, and the Habitat Restoration and Revegetation Plan required under MM BIO-2), and MM HWQ-1 (*Prepare and Implement Drainage Plans*) . With the implementation of these measures, impacts would be reduced to less than significant (Class II).

These mitigation measures include the implementation of a a County-approved worker training program, site stabilization, weed control, biological monitoring, the implementation of a Construction Drainage Plan, and plan tracking and enforcement during Phase 1 activities at the DCPP site.

Railyards

One drainage feature and 5 wetland features were identified within the PBR site during a preliminary assessment conducted by PG&E (PG&E, 2020a). Each of these features were determined to meet the requirements of federal or state jurisdiction. There were no features identified within the SMVR-SB site that would meet these requirements. Although not within the PBR site, Pismo Creek, a perennial blue line drainage is located immediately south of the site. Additionally, Guadalupe Lake is located approximately 350 feet south of the SMVR-SB site and a retention basin and other stormwater basins occur immediately adjacent to the site. These features have not been formally delineated and could meet federal and state jurisdiction.

Vegetation removal and grading activities would not be required as part of modifications at the PBR or SMVR-SB sites. The majority of each of these sites is covered by impervious surfaces and this would not change during decommissioning activities. Therefore, erosion and sedimentation would continue to be managed as it is under existing conditions and impacts would not occur. Loading and unloading activities would involve vehicles and equipment that utilize hazardous materials (e.g., motor oil, diesel fuel, hydraulic fluid). Direct impacts would occur if such

materials are accidentally released or improperly contained and enter jurisdictional features or potentially jurisdictional features within or immediately adjacent to the PBR or SMVR-SB sites. Indirect impacts could occur if noxious and invasive species if the introduction and establishment of noxious species results in the degradation of riparian habitat associated with jurisdictional features or potentially jurisdictional features, particularly along Pismo Creek.

As part of the Proposed Project, PG&E would delineate work limits, prohibit staging of equipment within 100 feet of aquatic resources, require the use of secondary containment (e.g., drip pans), vehicle and equipment inspections for leaks, and weed control to reduce the potential introduction and spread of noxious and invasive species (AC BIO-4, *Site Maintenance and General Operations*, and AC BIO-8, *Noxious Weed Prevention*). Impacts to federal and state waters and wetlands at the PBR and SMVR-SB sites would be less than significant, and no additional mitigation is required (Class III).

Phase 2

During Phase 2, grading/fill activities would primarily focus on backfilling voids created by the demolition of DCPP structures and restoring the DCPP site to a natural condition that promotes positive drainage. The process of removing the Discharge Structure and completing associated restoration would continue in Phase 2 (see Phase 1 discussion). In addition, a new blufftop road segment would be constructed to connect Shore Cliff Road with the North Ranch Road (Pecho Valley Road).

Direct impacts to federal and state waters and wetlands would be similar in type to those described for Phase 1 (see Phase 1 discussion). Direct impacts to jurisdictional features resulting from vegetation and grading activities would be reduced in magnitude since the majority of these activities would be completed in Phase 1 (see Phase 1 discussion). During Phase 2, PG&E would prepare a Revegetation Plan as part of the Proposed Project (see Section 2.4.4, *Grading and Landscaping [Final Site Restoration]*) that would apply to all temporary disturbance areas and the demolition zone. As part of final site restoration, grading would be conducted to reestablish natural contours and impacted areas would be revegetated to establish native vegetation that is consistent with adjacent plant communities.

Direct impacts from increased erosion and sedimentation would be increased in magnitude during Phase 2 since the majority of hardscape features at the DCPP site would be removed resulting in greater levels of exposed soils. The use of vehicles and equipment during Phase 2 would result in the potential for the accidental release or improper containment of hazardous materials which could directly impact federal and state waters and wetlands if these materials are transported offsite and into jurisdictional features, particularly during rain events.

The level of exposed soils occurring at the DCPP site during Phase 2 would increase the potential for the introduction and spread of noxious and invasive weeds. Indirect impacts would occur if noxious and invasive species are introduced or spread into the DCPP site or adjacent habitat during Phase 2 activities.

Indirect impacts during Phase 2 would also occur if ongoing grading activities result in increased long-term erosion and sedimentation or altered on-site drainage patterns that degrade riparian habitat and water quality. As part of the overall site restoration design and pursuant to Section

23.05.042 (Drainage Plan Required) of the San Luis Obispo County Code, a SWMP would be prepared (see Section 2.4.5, *Long-Term Stormwater Management*). The SWMP would implement long-term management of stormwater drainage from the site over the period of time required for revegetation to establish and to minimize potential sediment impacts from the site to Diablo Creek and other jurisdictional features.

Impacts would be significant without mitigation. Therefore, the same mitigation measures listed for Phase 1 activities at the DCPP site would be implemented during Phase 2. Additionally, MM HWQ-1 (*Prepare and Implement Drainage Plans*), which requires the preparation and implementation of a Post-Decommissioning Drainage Plan prior to initiating Phase 2 activities, and MM HWQ-2 (*Long-Term Erosion and Sediment Control Plan*), which would identify BMPs to control erosion and sedimentation from the site during grading and final site restoration activities, would be required. The implementation of these mitigation measures would ensure that impacts are reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. These activities would be conducted in fully developed areas that are isolated from jurisdictional features identified at the DCPP site. Post-decommissioning activities would also include periodic tree trimming and brush removal to maintain defensible space around building and access roads in compliance with CAL FIRE/County requirements. These activities would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. Therefore, there would be no impacts, and no mitigation is required.

Future Actions. Upon the NRC's release of the Part 50 license, the Marina would be made available to a third-party for permitting and reuse for recreational, education, or commercial purposes and controlled access from the Avila Gate Guard House Facilities would no longer be implemented. Operations could include boating activities and use of the ancillary structures, parking lots, and public restroom facility. For analysis purposes, it is assumed that up to 200 persons could visit the Marina per day. Any third-party use of the Marina would be restricted to developed facilities within the Marina. However, since access to the facilities would be uncontrolled, direct impacts could occur if jurisdictional features are damaged or loss as a result of public use outside of the developed areas. Impacts to jurisdictional features would be significant without mitigation. Therefore, MM BIO-6 (*Install "No Entry" Signage at DCPP*), which includes restrictions for entering unauthorized areas during future actions, would ensure that impacts are reduced to less than significant (Class II).

Mitigation Measures for Impact BIO-9.

BIO-1 Prepare and Implement a Worker Environmental Awareness Program (WEAP)

BIO-2 Prepare and Implement a Habitat Restoration and Revegetation Plan

BIO-3 Implement Oak and Native Mature Tree Protection Measures

BIO-6 Install "No Entry" Signage at DCPP

BIO-9 Conduct Biological Monitoring and Reporting

EM-2 Project Plan Updating, Tracking, and Reporting See Section 3.2.

HWQ-1 Prepare and Implement Drainage Plans See Section 4.11.

HWQ-2 Long-Term Erosion and Sediment Control Plan See Section 4.11.

Impact BIO-10: Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (No Impact).

Phase 1

DCPP Project Site

The County of San Luis Obispo uses a combination of the General Plan, Land Use Ordinances, and CEQA Guidelines, where applicable, to avoid or minimize impacts of development and urbanization to sensitive biological resources.

As discussed in Section 4.3.2 (*Regulatory Setting*), several Land Use Ordinances are applicable to the Proposed Project. These ordinances provide specific protections for biological resources, including native mature trees, wetlands, streams and riparian vegetation, terrestrial habitats, and ESHAs. PG&E would be required to comply with the conditions of these regulations prior to the issuance of land use and construction permits and throughout the duration of Proposed Project activities. This would include submittal of the appropriate planning documents, obtainment of pertinent County permits, and the implementation of standards identified in the ordinances, such as tree removal criteria and required setbacks from wetlands, riparian habitats, and ESHAs.

As described in Impacts BIO-1 through BIO-9, the Proposed Project would be consistent with local and regional policies and ordinances protecting biological resources, including the Land Use and Coastal Land Use Ordinances of the San Luis Obispo County Code. Therefore, no impact would occur.

Railyards

Pismo Beach Railyard. PG&E would be required to comply with the same regulations discussed for the DCPP site under Phase 1 prior to the issuance of land use and construction permits and throughout the duration of Proposed Project activities. This would include submittal of the appropriate planning documents, obtainment of pertinent County permits, and the implementation of standards identified in the ordinances, such as tree removal criteria and required setbacks from wetlands, riparian habitats, and ESHAs.

As described in Impacts BIO-1 through BIO-9, the Proposed Project is consistent with local and regional policies and ordinances protecting biological resources, including the Land Use and Coastal Land Use Ordinances of the San Luis Obispo County Code. Therefore, no impact would occur.

SMVR-SB. Proposed Project activities at the SMVR-SB site would be consistent with existing operations at the facility and would not include any vegetation or tree removal or grading activities at the site. Therefore, there would be no conflicts with local policies or ordinances protecting biological resources and no impact would occur, and no mitigation is required.

Phase 2

PG&E would continue to comply with the same regulations discussed for the DCPP site under Phase 1 throughout the duration of Phase 2 activities. This would include submittal of the appropriate planning documents, obtainment of pertinent County permits, and the implementation of standards identified in the ordinances, such as tree removal criteria and required setbacks from wetlands, riparian habitats, and ESHAs.

As described in Impacts BIO-1 through BIO-9, the Proposed Project would maintain consistency with local and regional policies and ordinances protecting biological resources, including Title 22 Oak Woodland Ordinance (Section 22.58) of the San Luis Obispo County Code. Therefore, no impacts would occur, and no mitigation is required.

Post-Decommissioning Operations

New Facility Operations. Upon completion of Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. These activities would be conducted within fully developed areas. In compliance with CAL FIRE's defensible space requirements, post-decommissioning activities would also include periodic removal of brush and dead/dying trees. These activities would be minimal and would only be performed to maintain compliance with CAL FIRE and County regulations. Further, only dead/dying oaks and other mature trees would be trimmed or removed which would not conflict with any County Land Use Ordinances for protected trees (see Section 4.3.2). Therefore, impacts would be less than significant, and no mitigation is required.

Future Actions. Upon release of the Part 50 license, PG&E could lease and sublet (or other arrangement) the Marina to a third-party for recreational, educational, or commercial purposes. It is estimated that up to 200 persons could visit the Marina per day. From a terrestrial biological resources' perspective, any third-party use of the Marina would occur in previously developed areas and the level of activity would not exceed current operations at the DCPP site. As such, there would be no conflicts with local policies or ordinances. Therefore, there would be no impacts and no mitigation measures are required.

Mitigation Measures for Impact BIO-10. No mitigation is required.

Impact BIO-11: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan (No Impact).

Phase 1

DCPP Project Site

The DCPP site is not within an area designated by an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved Habitat Conservation Plan. Therefore, implementation of Phase 1 activities at the DCPP site would not conflict with any such plan. As such, there would be no impact, and no mitigation is required.

Railyards

Neither of the railyard facilities are within an area designated by an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved Habitat Conservation Plan. Therefore, implementation of Phase 1 activities would not conflict with any such plan. As such, there would be no impact, and no mitigation is required.

Phase 2

The DCPP site is not within an area designated by an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved Habitat Conservation Plan. Therefore, implementation of Phase 1 activities at the DCPP site would not conflict with any such plan. As such, there would be no impact, and no mitigation is required.

Post-Decommissioning Operations

New Facility Operations. The DCPP site is not located within an area designated by an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved Habitat Conservation Plan. Therefore, new facility operations would not conflict with any habitat conservation plans. As such, there would be no impacts, and no mitigation is required.

Future Actions. The DCPP site is not within an area designated by an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved Habitat Conservation Plan. Therefore, Marina improvements would not conflict with any habitat conservation plans. As such, there would be no impacts and no mitigation is required.

Mitigation Measures for Impact BIO-11. No mitigation is required.

4.3.5 Cumulative Impact Analysis

Geographic Extent Context

For the purposes of this cumulative impacts analysis, there are four projects within the County of San Luis Obispo that are located within an approximately 5-mile radius closest to the DCPP site where there is the potential for impacts related to terrestrial biological resources to

combine with the Proposed Project (see Table 3-1, *Cumulative Projects Located Near the DCPP Decommissioning Project*, and Figure 3.1-1):

- Orano System ISFSI Modifications (#1)
- Communications Facility (#2)
- Flying Flags Campground (#4)
- Avila Beach Resort Phased Expansion Development Plan/Coastal Development Permit (#6)

The geographic extent of this analysis is appropriate because the terrestrial biological resources within this area are expected to be similar to those that occur in and around the Project area. Cumulative impacts could occur if other projects, in conjunction with the Proposed Project, would have impacts on terrestrial biological resources that, when considered together, would be significant.

Cumulative Impact Analysis

Phase 1 and Phase 2

Several of the projects listed in Table 3-1, particularly the projects identified within the geographical extent for this analysis, are permanent development projects that could result in adverse impacts to terrestrial biological resources, including native vegetation communities, nesting birds and raptors, special-status species, and waters and wetlands of the US and state. Impacts resulting from the implementation of the Proposed Project would be temporary and would be reduced through the identified mitigation measures. Further, due to the restorative nature of the Proposed Project at the DCPP site, long-term impacts to terrestrial biological resources would be ultimately beneficial. Therefore, the Proposed Project's potential contribution to impacts on terrestrial biological resources would not be cumulatively considerable.

Post-Decommissioning Operations

Post-decommissioning activities at the DCPP site would include new facility operations and future actions related to third party use of the Marina. Neither of these components would require any new permanent development. Any activities during post-decommissioning would be conducted within existing facilities. Therefore, the Proposed Project's post-decommissioning activities would not represent a considerable contribution to cumulative impacts on terrestrial biological resources.

4.3.6 Summary of Significance Findings

Table 4.3-7 presents a summary of the impacts to terrestrial biological resources, significance determinations, and mitigation measures for the Proposed Project.

Table 4.3-7. Summary of Impacts and Mitigation Measures – Biological Resources - Terrestrial

	Impact Significance Class				
	Phase 1		Phase 2 Post-Decom		
Impact Statement	***DCPP***	***PBR/SB***	***DCPP***	***Ops/Marina***	**Mitigation Measures**
BIO-1: Result in permanent and temporary loss of native vegetation communities.	II	III/III	II	NI/II	**AQ-1:** Implement a Decommissioning Activity Management Plan (DAMP) **BIO-1:** Prepare and Implement a Worker Environmental Awareness Program (WEAP) **BIO-2:** Prepare and Implement a Habitat Restoration and Revegetation Plan **BIO-3:** Implement Oak and Native Mature Tree Protection Measures **BIO-4:** Prepare and Implement a Weed Management Plan **BIO-5:** Prepare and Implement a Biological Resources Adaptive Management Plan **BIO-6:** Install "No Entry" Signage at DCPP **EM-2:** Project Plan Updating, Tracking, and Reporting **HWQ-1:** Prepare and Implement Drainage Plans **HWQ-2:** Long-Term Erosion and Sediment Control Plan
BIO-2: Establish and/or spread of noxious and invasive weeds or invasive wildlife species.	II	III/III	II	III/III	**BIO-1** and **BIO-4** (see above)
BIO-3: Result in the loss, harm, injury, harassment, or potential mortality of common terrestrial wildlife.	III	III/III	III	NI/NI	None required
BIO-4: Result in loss or disturbance to nesting or breeding birds or raptors.	II	II/II	II	III/II	**AES-1:** SMVR Lighting Guidelines **AQ-1** and **EM-2** (see above)**BIO-1** through **BIO-4**, **BIO-6** (see above) **BIO-7:** Prepare and Implement a Nesting Bird Management Plan
BIO-5: Result in the loss or disturbance to any special-status plant species or their critical habitat.	II	II/II	II	III/II	**BIO-1** through **BIO-6** (see above) **BIO-8:** Conduct Preconstruction Surveys for Special-Status Plants and Implement Avoidance Measures **AQ-1, EM-2, HWQ-1,** and **HWQ-2** (see above)

Table 4.3-7. Summary of Impacts and Mitigation Measures – Biological Resources - Terrestrial

	Impact Significance Class				
	Phase 1		Phase 2 Post-Decom		
Impact Statement	***DCPP***	***PBR/SB***	***DCPP***	***Ops/Marina***	**Mitigation Measures**
BIO-6: Result in the loss or disturbance to special-status terrestrial species, including invertebrates, fish, amphibians, reptiles, birds, and mammals or their critical habitat.	II	II/II	II	III/II	**BIO-1** through **BIO-7** (see above) **BIO-9:** Conduct Biological Monitoring and Reporting **BIO-10:** Implement Wildlife Impact Avoidance and Minimization Measures **BIO-11:** Conduct Protocol-Level Surveys for Morro Shoulder-band Snail and Implement Avoidance Measures **BIO-12:** Conduct Visual Presence/ Absence Surveys for Crotch's Bumble Bee and Implement Avoidance Measures **BIO-13:** Conduct Roosting Site Surveys for Monarch Butterfly and Implement Avoidance Measures **BIO-14:** Conduct Preconstruction Surveys for Special-Status Herpetofauna and Implement Avoidance Measures **BIO-15:** Install and Maintain California Red-Legged Frog Exclusion Fencing **BIO-16:** Conduct Clearance Surveys and Monitoring for California Red-Legged Frog **BIO-17:** Conduct Preconstruction Surveys for Overwintering Burrowing Owl and Implement Avoidance Measures **BIO-18:** Conduct Preconstruction Surveys for San Diego Desert Woodrat Middens and Implement Avoidance Measures **BIO-19:** Conduct Preconstruction Surveys for American Badger and Ringtail Dens and Implement Avoidance Measures **BIO-20:** Conduct Preconstruction Surveys for Roosting Bats and Implement Avoidance Measures **AQ-1, EM-2, HWQ-1,** and **HWQ-2** (see above)
BIO-7: Result in permanent or temporary loss or disturbance to habitats identified as, or that may qualify as, an Environmentally Sensitive Habitat Area (ESHA)	II	NI/NI	II	NI/II	**BIO-1** through **BIO-6** (see above) **AQ-1, EM-2, HWQ-1,** and **HWQ-2** (see above)

Table 4.3-7. Summary of Impacts and Mitigation Measures – Biological Resources - Terrestrial

	Impact Significance Class				
	Phase 1		Phase 2 Post-Decom		
Impact Statement	***DCPP***	***PBR/SB***	***DCPP***	***Ops/Marina***	**Mitigation Measures**
under Section 30000 et seq. of the California Coastal Act of 1976.					
BIO-8: Interfere with established wildlife migratory corridors or terrestrial wildlife nursery sites.	III	NI/NI	III	III/NI	None required
BIO-9: Result in the loss or disturbance to federal or State protected wetlands defined under Sections 401 and 404 of the Clean Water Act, the Porter-Cologne Water Quality Control Act, Section 30233 of the Coastal Act, Section 1600 et seq. of the California Fish and Game Code, or other jurisdictional habitats.	II	III/III	II	NI/II	**BIO-1** through **BIO-3, BIO-6,** and **BIO-9** (see above) **EM-2, HWQ-1,** and **HWQ-2** (see above)
BIO-10: Conflict with local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	NI	NI/NI	NI	NI/NI	None required
BIO-11: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan.	NI	NI/NI	NI	NI/NI	None required
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.