

## 4.5 Cultural Resources – Archaeology and Built Environment

This section provides information on existing cultural resources in and surrounding the Project areas. The California Environmental Quality Act (CEQA) requires that the effects of discretionary projects on cultural resources be considered in the planning process. This section evaluates the Proposed Project’s potential impacts to these resources. Tribal Cultural Resources are separately addressed in Section 4.6, *Tribal Cultural Resources (TRCs)*. TRCs are a defined class of resources under state law, which include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Tribe.

Cultural resources can reflect the history, diversity, and culture of the region, as well as the people who created them. Cultural resources are unique in that they are often the only remaining evidence of human activity that occurred in the past. Cultural resources can be natural or built, purposeful or accidental, physical, or intangible. They encompass archaeological, traditional, and built environment resources, including but not necessarily limited to buildings, structures, objects, districts, and sites. Cultural resources include locations where important events occurred, traditional cultural places, sacred sites, and places associated with important people.

The following discussion is based on the confidential cultural resources technical reports prepared for PG&E for the Proposed Project which are the *Diablo Canyon Decommissioning Cultural Resource Inventory and Study Plan* (PG&E, 2020), *Cultural Resources Constraints Analysis for the Santa Maria Railyards, Santa Maria, Santa Barbara County, California* (PG&E, 2021), and the *Diablo Canyon Power Plant Decommissioning Project Historic Built Environment Evaluation Report* (Page & Turnbull, 2022; EIR Appendix F), unless otherwise referenced.

**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:

- Evaluate the cultural resource sites including sites numbered CA-SLO-81 and -832.
- Ensure robust review of cultural resource impacts and necessary mitigation measures; and
- Identify cultural resources and impacts within the proximity of Pismo Beach rail yard.

### 4.5.1 Environmental Setting

#### 4.5.1.1 Definitions of Cultural Resources

A **cultural resource** is defined as any object or specific location of past human activity, occupation, or use, identifiable through historical documentation, inventory, or oral evidence. Cultural resources can be separated into three categories: archaeological, built environment, and tribal cultural resources.

**Archaeological resources** include both historic era and prehistoric remains of past human activity. Historic era resources can consist of structural remnants (e.g., cement foundations), historic era objects (e.g., bottles and cans), and sites (e.g., refuse deposits or scatters). Prehistoric

resources can include lithic scatters, ceramic scatters, quarries, habitation sites, temporary camps/rock rings, ceremonial sites, and trails.

**Built environment resources** consist of standing historic era buildings and structures, the latter of which includes canals, roads, trails, bridges, ditches, and cemeteries.

Pursuant to State CEQA Guidelines Section 15064.5, **historical resource** is a term used to define a prehistoric or historic aged resource that is recommended eligible, determined eligible, or listed on the California Register of Historical Resources (CRHR). Any resource that is determined eligible or listed on the National Register of Historic Places (NRHP) is automatically eligible for listing in the CRHR and is considered a significant resource for the purpose of this analysis.

A **unique archaeological resource**, as defined by CEQA Section 21083.2 (g), is a resource that, besides merely adding to the current body of knowledge, meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

#### **4.5.1.2 Precontact Setting**

The chronology of the California's central coast is generally broken up into six prehistoric time periods: Paleo-Indian Period, Millingstone/Lower Archaic, Early Period, Middle Period, Middle-Late Transitional Period, and Late Period. Each period is briefly described below to provide a general prehistoric context of the Project area. This combines information from the Pecho Coast with the general patterns of prehistoric occupation throughout the Central Coast. Time is presented in calibrated years before present (cal B.P.).

##### ***Paleo-Indian/Paleo-Coastal Period (pre-10,300 cal B.P.)***

Conventional theories concerning the Paleo-Indian period place the earliest human occupations in the region prior to 10,000 years ago. Identification of Paleo-Indian sites throughout North America are identified by the presence of large fluted projectile points, like the Clovis point. Other such sites have contained crescents, large bifaces used as tools, flake and blade cores, as well as distinctive assemblages of small flake tools. However, on the California Central Coast, only three isolated fluted points have been recovered from Santa Barbara and San Luis Obispo County. Recently, new discoveries along the mainland coast have shown additional evidence of Paleo-Indian occupation. Sites in Santa Barbara, Vandenberg Air Force Base, San Miguel and Santa Rosa Islands, have been found, through radiocarbon dating, as well as unique artifact assemblages, to reflect an early culture similar to those found at Paleo-Indian sites in Northern Alaska/Beringia. Fluted points have not been encountered at these sites nor have any other notable artifacts that are typically associated with Paleo-Indian occupation, however, Crescent and Amol stemmed points were found that date to the terminal Pleistocene period (11,700 ca B.P.).

### ***Millingstone/Lower Archaic Period (10,300-5,700 cal B.P.)***

The Pecho Coast sites that are the best documented date to the Millingstone/Lower Archaic Period. These sites include artifacts similar to coastal southern California sites, comprised of numerous choppers, handstones, milling slabs, core hammers, and scraper planes used to process plant foods. Projectile points are rare and include large side-notched and contracting-stemmed dart sized points. These assemblages reflect the pursuit and processing of small and large game as well as processing terrestrial vegetation. Fish were most likely caught and consumed; however, no obvious fishing implements appear to be present in the artifact assemblages recovered. Instead, pitted stones are abundant and were possibly utilized for processing shellfish. It is theorized that shoreline sites were used as short-term camps, whereas inland sites were used as specialized residential sites where incoming terrestrial and marine fauna were processed and plant sources collected.

### ***Early Period (5,700-2,250 cal B.P.)***

Around 5,700 cal B.P., an important adaptive transition occurred along the Central Coast. This adaptive transition occurred through the technological changes in hunting implements and plant processing tools. In the artifact assemblages recovered from these sites, there is an abundance of contracting-stemmed, Rossi square stemmed, large side-notched, and other large sized projectile points. These start to diminish in the archaeological record after the first 700 years of the Early Period and disappear circa 5,000 cal B.P. Manos and milling slabs were gradually being replaced with mortars and pestles suggesting a dietary expansion to include acorns. Trade increases through the region are indicated by the presence of shell beads and obsidian materials. Early Period sites along the Central Coast increase in number suggesting population growth. Residential sites appear to be more settled, but still seasonal in nature. As far as hunting is concerned, evidence from the faunal record indicates a greater reliance developed on coastal/marine fauna along with a slight decrease in reliance on terrestrial fauna.

### ***Middle Period (2,550-950 cal B.P.)***

The Middle Period marks a time of remarkably more complex prehistoric technology and economy. Tools reflecting forms of specialization in what is referred to as “resource exploitation” (i.e., hunting and gathering), were adopted. These tools included fishing implements such as shellfish hooks, bone gorges, and grooved stones that could have been used as in-line sinkers in tandem with shellfish hooks or as net weights. Contracting-stemmed projectile points continued to dominate Pecho Coast sites. The wooden plank canoe, otherwise referred to as a tomol, came into use after 1,500 cal B.P. However, there has not been recent archaeological evidence that tomols were utilized or adopted by peoples of the Santa Barbara Channel region, north of Point Conception. Due to the abundant findings of mortars and pestles versus manos and milling stones, it can be inferred that during this period a reliance on harder seeds such as acorns occurred. Economically, trade and contact with other groups appears to increase. This is evident through the increase of shell beads found in the form of Olivella saucers. It is speculated that they came from production centers on the northern Channel Islands. There is also an increase in obsidian sourced from the Eastern Sierra Nevada Region (i.e., the Coso and Casa Diablo volcanic fields).

### ***Middle-Late Transitional Period (950-700 cal B.P.)***

Political complexity, the development of social ranking, and the development of craft specialization began to emerge along the Santa Barbara Channel during the Middle-Late Transitional Period. Artifact assemblages diverge at this point where arrow points (used for bow and arrow technology) appear, and most stemmed points disappear. Milling tools are almost absent and limited to a single pestle. Fishing tools are also present in the form of fishhooks, fishhook blanks, bone gorges, and notched stones. The faunal record indicates terrestrial mammals making up the bulk of the native peoples' diet. Fishing and gathering of shellfish continue today. The higher reliance on hunting of terrestrial mammals could possibly be attributed to the seasonal nature of habitation (i.e., seasonal hunting camps). Environmental change is another possible explanation of the temporary nature of coastal hunting camps. Warmer temperatures and drier conditions occurred possibly creating a decline in access to marine resources. Increased interaction with groups along the Santa Barbara Coast as well as the northern Channel Islands can be seen in the increase in the number of Olivella shell beads. Trade in Eastern Sierra obsidian appears to drop, but only in the Santa Barbara region. The Pecho Coast sites appear to have an increase in obsidian artifacts.

### ***Late Period (700-180 cal B.P.)***

During the Late Period, it appears that more sites were occupied than ever before. Central Coast people used a range of subsistence strategies depending on the local available ecology. On the Pecho Coast, a site known as the ethnographic village of Tstywi, shows evidence of long-term residential occupation. Artifact assemblages include mostly small projectile points such as Desert side-notched points as well as Coastal Cottonwood style points. Mortars and pestles are the primary plant processing tools found at these sites. Olivella and steatite beads are also present. Shell fishhooks and end-notched stone weights are found as well. Faunal assemblages see another increase in terrestrial mammals. Sea mammal hunting, fishing, and shellfish gathering make up the rest of the subsistence efforts.

### ***Historic/Postcontact Period (180 cal B.P.-130 cal B.P.)***

Spanish occupation in the area began in 1769, and the establishment of Spanish missions in the San Luis Obispo area greatly disrupted the native social, economic, and political organization. Archaeological evidence indicates the native population of the Pecho Coast was rapidly decimated by missionization. As Spanish settlers conscripted Chumash people to live and work at the missions, they also moved into native territories, limited Native Californians' access to historic foraging areas, introduced new European domestic plants and animals which disrupted the local ecology, and exposed the Native Californians to European diseases to which native populations had limited resistance, substantially reducing their population.

There is evidence of this period in the cultural assemblage at CA-SLO-51/H, part of the Chumash village Tstywi, which includes both shell beads and glass trade beads, a large variety of stone tools, and a high density of artifacts in general, distinguishing this assemblage from the prehistoric assemblages elsewhere in the site. Overall, the Postcontact period component of the site reflects a small, year-round population with a smaller foraging range that was exploited more intensively. There is an increased focus on marine resources, especially on shoreline fishing, and

a reduced focus on both deeper ocean fishing and terrestrial mammals, although some domestic cattle are observed in the food record during this time as well. This reflects a shrinking resource area that was available to the Chumash at this time, as well as a reduced overall population and a lack of travel for foraging purposes, all of which were responses to Spanish encroachment on their historic territory.

#### **4.5.1.3 Ethnographic Setting**

The earliest residents to the DCPD site and the Pecho Coast are the Northern Chumash. Santa Maria Valley Railyard – Osburn Yard and the Santa Maria Valley Railyard – Betteravia Industrial Park areas of the Proposed Project are located within lands traditionally occupied by the Santa Ynez Band of Chumash Indians.

The Chumash were among the most populous and socially complex groups in all of what is now California. During the Late Period, the Chumash were living in large villages along the Santa Barbara Channel coast, with less dense populations in the interior regions; on the Channel Islands; and in coastal areas north of Point Conception. Some villages may have had as many as 1,000 inhabitants, and population density was unusually high for a non-agricultural group. Occupational specialization went beyond craft activities such as bead production to include politics, religion, and technology. Complex social and religious systems tied many villages together and regulated regional trade, procurement and redistribution of food and other resources, conflict, and other aspects of society. Leadership was hereditary, and some chiefs had influence over several villages, indicating a simple chiefdom level of social organization.

The Chumash were a non-agrarian culture that relied on fishing, hunting, and gathering for their sustenance. Much of their subsistence was based on marine resources, and acorns were also a major food staple. The Northern Chumash participated in long-range prehistoric trade networks. For example, they supplied the Yokuts with asphaltum and shells used in beadmaking, receiving in exchange pottery and possibly obsidian.

Although most Chumash eventually submitted to the Spanish and were incorporated into the mission system, some refused to give up their traditional existence and escaped into the interior regions of California as refugees living with other tribes. With the secularization of mission lands after 1834, traditional Chumash lands were distributed among grants to private owners. Only in the area of Mission Santa Barbara and Mission San Fernando Rey de España were several small ranchos granted to neophytes of these missions, providing a home and gardens for a few of these refugees. Most Chumash managed to maintain a presence in the area into the early twentieth century as cowboys, farm hands, and town laborers. The Catholic Church provided some land near Mission Santa Inés. This land eventually was deeded to the U.S. government in 1901 as the 127-acre Santa Ynez Reservation. Since the 1970s, Chumash descendants living in the City of Santa Barbara and the rural areas of San Luis Obispo, Santa Barbara, and Ventura Counties have formed social and political organizations to aid in cultural revitalization, to protect sacred areas and archaeological sites, and to petition for federal recognition. Today, the Santa Ynez Band of Chumash Indians is the only federally recognized Chumash tribe.

Due to the rich and vast history of the Pecho Coast being the ancestral home to the Chumash, the importance of preservation of the Project area and the sites known and unknown are of the utmost importance to their descendants.

#### **4.5.1.4 Historic Setting**

##### ***San Luis Obispo, 1772 to ca. 1970***

Spanish explorers arrived in Mexico in the 16<sup>th</sup> century. In order to establish control over this new territory, they began using a system of missions and presidios to settle New Spain (present-day Mexico and Baja California). In 1768, King Carlos III decided to expand the mission program into Alta California (present-day California). Father Junipero Serra, a Catholic Priest, was sent to Alta California to build missions between 1769 and 1823. He began building missions in San Diego, working his way up the coast. In 1772, he founded Mission San Luis Obispo de Tolosa in San Luis Obispo. Twenty-one missions were ultimately established along California's coast.

After Mexico achieved independence from Spain in 1822, Alta California became part of the Mexican Republic. The Mexican government began issuing land grants and created a system of large agricultural estates or ranchos. In 1834, Mexican authorities asserted governmental authority over mission lands. Through secularization, the Mexican government took land from the missions and began redistributing it through private land grants. During the Mexican period, approximately 30 ranchos existed within San Luis Obispo County. Rancho San Miguelito encompassed the present DCPD site and was granted to Miguel Ávila in 1842.

The discovery of gold in the foothills of the Sierra Nevada in 1848 brought miners and entrepreneurs to California from all over the world. This mass migration created demand for goods and services, especially cattle, thus boosting economic development for California ranchos. In 1848, the United States and Mexico signed the Treaty of Hidalgo, ending the Mexican American War. The treaty transferred Mexican land rights in Texas, California, and New Mexico to the United States. In 1850, California became a state, and San Luis Obispo County was created as one of the state's original 27 counties. Much of the lands owned by Mission San Luis Obispo were divided into ranchos and redistributed to private owners. The City of San Luis Obispo, also serving as the County seat, was created from former mission land that was platted out into a town grid in 1874.

The economy of San Luis Obispo County in the late 19<sup>th</sup> century centered around ranching, farming, and vineyards, much of which took place on the ranchos. Wheat and barley were the most important agricultural crops in the region, while wool, flour, and dairy products were also important income producers. From 1862 to 1864, a severe drought struck San Luis Obispo County. As a result, many of the area's cattle ranches were sold, and the local agricultural industry began to shift toward dairy farming.

Until the late 19<sup>th</sup> century, San Luis Obispo County remained relatively isolated due to surrounding mountains that limited transportation on horseback, stagecoach, and wagon. Wharves constructed in San Luis Bay at Avila Beach in the 1850s and 1860s enabled goods to be transported via steamship. Further transportation improvements in the late 19<sup>th</sup> century led to increased development. In 1873, businessman John Harford established the San Luis Obispo Railroad Company and built a new wharf, Point Harford, at Point San Luis that was connected by a horse-drawn, narrow-gauge railroad to San Luis Obispo Creek. The railroad allowed the region's

farmers to ship their goods more easily from the port. By 1876, passenger and freight service were also offered by the Pacific Coast Steamship Company, which operated at approximately 20 California ports.

The expansion of rail service from northern and southern California through San Luis Obispo County enabled further growth. The Pacific Coast Railway was completed from Los Olivos in Santa Barbara County to San Luis Obispo in 1881. This was followed by the completion of the Southern Pacific Railway between San Francisco and Santa Margarita in San Luis Obispo County, just north of the City of San Luis Obispo, in 1886. The coming of the railroads spurred a period of speculative development in the late 1880s and attracted workers from diverse background – including Japanese, Italian, and Swiss men and women – to the area.

Numerous factors influenced the development of San Luis Obispo County in the first half of the 20<sup>th</sup> century. Interest in the railroads began to wane in the early 20<sup>th</sup> century as the popularity of the automobile increased. The California Polytechnic School (Cal Poly) opened in 1903 as a school for agricultural and vocational training. Located at the northern outskirts of the City of San Luis Obispo, the school became an important driver in the City's growth as its population swelled with students, particularly following World War I.

In 1915, the Pacific Coast Highway (State Route 1), the first state highway in California, was completed through San Luis Obispo County, bringing automobile tourism to the region.

While much of the County's economy continued to evolve around ranching and agriculture, oil drilling also became an important part of the economy of San Luis Obispo County in the early 20<sup>th</sup> century. Port San Luis subsequently developed into the largest oil shipping port in the world and employed hundreds of workers from the surrounding area.

The establishment of Camp San Luis Obispo also helped diversity the region's economy. The camp, founded in 1927 on the 2,000-acre Jack Ranch along State Route 1, was the first formal training camp for the California National Guard. The camp was renamed Camp Merriam in 1932. Many of the soldiers who trained at the camp settled in the area after they had completed their military service.

Given its agricultural and economic diversity, San Luis Obispo County was buffered from the worst effects of the Great Depression in the 1930s. Nevertheless, residential and commercial development was limited during this period. New Deal programs such as the Public Works Administration and Works Progress Administration funneled money to the construction of a new County courthouse, as well as local flood control and highway improvement projects, including the completion of State Route 1 between Morro Bay and Carmel.

The completion of more reliable highways and roads not only improved transportation for commuters and tourists but also benefited the local agricultural industry. Refrigerated trucks increasingly replaced railcars as the primary means of transporting fresh produce to markets, enhancing the vitality of the local produce industry and contributing to the decline of the railroads. Reflecting the increasing shift toward automobile transportation, the Pacific Coast Railway closed in 1936.

The entry of the United States into World War II brought San Luis Obispo County out of the Great Depression and boosted the region's economy. In the immediate lead up to the war, Camp Merriam was renamed back to Camp San Luis Obispo, and a county regional airport opened in 1939. Both were utilized by the federal government as part of the war effort. Camp San Luis Obispo was rapidly expanded to serve as the training base for multiple combat divisions deployed to Europe and the Pacific regions. Additional military facilities developed during the war included the Baywood Park Training Camp 13 miles northwest of San Luis Obispo and a rest camp for ill and wounded soldiers between Grover Beach and Pismo Beach. Employment opportunities at these military facilities attracted many former agricultural workers from the San Joaquin Valley and other farming areas to San Luis Obispo County.

After the war, the population of San Luis Obispo County expanded at a rapid pace, as returning veterans, many of whom had been stationed at one of the County's military bases decided to permanently settle in the area. Educational opportunities at Cal Poly also attracted veterans and their families to the area and contributed to the County's growth during the postwar period. As in many cities and counties across California, the postwar population boom resulted in a housing shortage. To meet the demand for new housing, large areas of farmland outside of existing cities and towns were developed into sprawling new subdivisions full of tract housing.

The completion of US Route 101 in 1958 boosted San Luis Obispo County's status as a popular tourist destination, thanks to its convenient location roughly halfway between Los Angeles and San Francisco. Motels and hotels sprang up along the highway in the 1950s and 1960s to cater to motor tourists. The construction of new commercial developments followed a similar trend. Across the County, new shopping centers, restaurants, and auto-oriented businesses were completed along the routes of highways and major new thoroughfares constructed in the new subdivisions at the outskirts of traditional urban centers.

### ***Diablo Canyon Power Plant Site History***

During the Mexican and Spanish periods, the site of the DCPD was part of Rancho San Miguelito, a 22,000-acre Mexican land grant comprised of former Mission San Luis Obispo lands. In 1842, the Mexican government granted Rancho San Miguelito to Miguel Ávila. Ávila was awarded an additional league of land (4,439 acres) in 1846 on the condition that a portion of his land along the coast remain open to the public in order to preserve access to San Luis Bay, which contained the area's only seaport. Ávila raised cattle on the land and made a living from the sale of cattle hides and tallow (animal fat). He built two houses on the rancho, one on the hill above San Luis Bay and a second near the shore. After the Mexican-American War, Ávila was elected *alcalde* (mayor) of San Luis Obispo; however, he resigned after only a year of service, due to the difficulty of traveling to town from his rancho. After the deaths of Ávila and his wife, the Rancho San Miguelito was divided between the couple's surviving children. Their son, Juan Vidal Ávila, inherited the largest portion of the former rancho. In 1867, Juan Ávila participated in the subdivision and sale of lots in the town of Avila Beach, named after his father. After some initial successes, Ávila's fortunes began to decline, forcing him to mortgage and gradually sell off the land he had inherited from his parents piece by piece. He sold off the last of his land holdings by the 1920s and died in 1930.



In 1882, Juan Ávila sold 6,000 acres of the former Rancho San Miguelito to Italian immigrant, rancher, and entrepreneur Luigi Marre. Marre used the lands to raise cattle for beef. After Marre's death in 1903, his property passed to his sons, Louie and Gaspar. Like their father, they continued to raise beef cattle on the ranch lands near Avila Beach. Around 1930, the brothers constructed a Spanish Colonial Revival duplex, designed by regional architect Louis Noire Crawford, on the hill overlooking San Luis Bay. During World War II, the Marre Ranch was used by US Armed Forces, including the Coast Guard and Army, who were stationed at Camp San Luis Obispo.

The Marre family continued to use the land for cattle ranching after the war until the mid-1960s, when they began to look to diversify their activities. The family demolished the remaining ranch buildings on the north side of San Luis Creek below the Marre house and built the Avila Beach Golf Course and San Luis Inn in their place. In order to raise money for the project, the Marre family began leasing off portions of its ranch lands.

Meanwhile, PG&E was in search of a site for a new nuclear power plant in the San Luis Obispo area. Having received opposition from the Sierra Club and other local conservationists to their first planned site at Nipomo Dunes, PG&E proposed a coastal site at Diablo Canyon as an alternative. In spite of substantial opposition from the Sierra Club's membership, including executive director David Brower, the club's board of directors voted to endorse PG&E's plan to site its nuclear plant at Diablo Canyon in June 1966. Plans to build the plant progressed rapidly following the Sierra Club's vote.

In September 1966, PG&E agreed to lease more than 1,000 acres of the Marre Ranch from the Marre Land and Cattle Company for its new nuclear power plant. The lease included 585 acres for the plant site, 420 acres for transmission lines, and an additional 50 acres for a road to the plant. In November 1966, PG&E announced that the contract to provide the nuclear reactors, turbine-generator, nuclear fuel, and other plant components for its new \$150-million plant had been awarded to Westinghouse Electric Corporation. Shortly afterward, PG&E submitted an application to the California Public Utilities Commission (CPUC) for permission to construct a 1,060,000-kilowatt (1,060 megawatts) nuclear reactor at Diablo Canyon; a formal application for a permit to build the single reactor and plant was submitted to the federal Atomic Energy Commission (AEC) nearly one month later in January 1967.

The applications to the CPUC and AEC launched 20 days of public hearings with the CPUC in the spring of 1967. At hearings in both San Luis Obispo County and San Francisco, members of the public, including Sierra Club member and leader of the Scenic Shoreline Preservation Conference Fred Eissler, expressed concerns about the preservation of California's coastal lands and the environmental impacts of the nuclear plant. Despite this opposition, the CPUC unanimously approved plans for the Diablo Canyon plant in November 1967, citing public need and testimony that the proposed plant posed no threat to animal or human life. At the time, PG&E anticipated that the plant would be operational and supplying power to Kern, Santa Barbara, San Luis Obispo, Kings, and Tulare counties by the spring of 1972.

On April 23, 1968, the AEC's Atomic Safety and Licensing Board authorized PG&E's plans for the Diablo Canyon plant and granted a construction permit for the project. Some preparation had already begun in anticipation of the AEC's approval. By February 1968, a new bridge that was

strong enough to carry the heavy industrial equipment for the plant had already been completed between Avila Beach and Port San Luis. In June, construction started on a new access road (Diablo Canyon Road) from Avila, stretching just east of and along the coastline to the plant site. Excavation work at the plant site began in August 1968 and continued into 1969.

In March 1969, the CPUC authorized an application from PG&E to construct a second reactor unit at the Diablo Canyon plant. Unit 1 was expected to be in operation in early 1973, while the Unit 2 was expected to go online in mid-1974. By May 1969, construction began on the first buildings on the site for Unit 1. A concrete batch plant at the south end of the planned campus, used to produce concrete to construct various buildings and structures of the plant, was one of the first buildings completed. This enabled construction to begin on the plant's core buildings. A large warehouse for equipment storage followed shortly after. By the end of 1969, construction of the Unit 1 Containment Building and portions of the Turbine Building and Auxiliary Building associated with the Unit 1 reactor were underway.

From 1969 through much of 1971, progress on the DCPD focused primarily on completing the main buildings and infrastructure necessary for the operation of Unit 1. At the same time, structural work on the underground concrete cooling water discharge and intake tunnels began in fall 1969. Transmission lines to relay power generated by the turbines to the power grid were erected in June 1970.

The first components of the nuclear reactors started to arrive on site in the summer of 1970. Beginning their journey at Westinghouse's factories on the East Coast, the reactor components were shipped by barge through the Panama Canal to Port San Luis. To prepare for their arrival, a new barge landing was constructed at Port San Luis near Avila Beach. The four steam generators for the Unit 1 reactor reached Port San Luis in July 1970 and were the first reactor components unloaded at the new barge landing. The Unit 1 reactor vessel arrived in September 1970. The equipment shipped to the barge landing was loaded onto special truck trailers and driven over Diablo Canyon Road to the plant site.

In December 1970, PG&E received authorization from the AEC to install a second reactor at Diablo Canyon. The decision cleared the way for construction to begin on the buildings and structures associated with the Unit 2 reactor. Meanwhile, construction on various support buildings and structures commenced outside the power block area. A small gatehouse (the Avila Gate) used to screen visitors was built at the entrance to Diablo Canyon Road, approximately seven miles from the power block area not far from Port San Luis. From approximately spring 1970 to winter 1971, two long breakwaters began to take shape off the coast next to the power plant site to create a new manmade cove. To create the breakwaters, hundreds of tons of rock and multi-ton concrete tribars were dropped into the ocean. Once completed, the manmade cove, also known as the Intake Cove, served as a sheltered location from which seawater could be drawn into the plant through a massive concrete Intake Structure to cool steam used to turn the turbine-generators. This cooling water would be released back into the ocean through a concrete Discharge Structure located in Diablo Cove, a natural cove directly to the north of the Intake Cove and just below the Turbine Building, after it had circulated through the plant.

As the breakwaters were taking shape, construction began on the Intake Structure and Discharge Structure in the summer of 1971. Both structures were erected by building coffer dams in the

Intake Cove and Diablo Cove to temporarily remove seawater from the areas during construction. Both were complete or nearly complete by early 1973.

By spring 1971, at least a dozen utilitarian support buildings and structures of varying sizes had been erected in a fabrication yard to the east and southeast of the power block and not far from the Intake Cove. The buildings in this area continued to evolve over the course of construction and into the early years of the plant's operation. Most of these early support buildings no longer exist.

Although DCPP Units 1 and 2 were originally scheduled to be in operation by 1973 and 1974, respectively, numerous unforeseen issues delayed the plant's completion for more than a decade. The first delay occurred in February 1972 when the AEC ordered a partial suspension of construction, pending review of an environmental impact study requested by the Scenic Shoreline Preservation Conference under the recently enacted National Environmental Policy Act (NEPA). By June 1972, the AEC ruled that work could continue at Diablo Canyon pending completion of the studies. It is unclear what impact the temporary halt had on the progress of construction at the DCPP, as historic photographs indicate that a significant amount of construction continued throughout much of the site during this period, including at the Unit 1 and 2 power block buildings and Intake and Discharge Structures. Foundations were also laid for two large raw water reservoir ponds on the upper terrace to the northeast of the power block during this time. The Unit 1 reactor vessel was installed inside the Unit 1 Containment Building in the first few months of 1973. The Unit 2 reactor vessel arrived at Port San Luis approximately one year later. In May 1973, the AEC ruled that the Diablo Canyon project had cleared environmental review. By this time, the start of operation of Units 1 and 2 had been pushed back to 1975 and 1976, respectively.

Perhaps the most impactful event in the plant's development occurred at the end of 1973, when a study by the US Geological Survey (USGS) confirmed that an active seismic fault, named the Hosgri Fault, ran off the coast approximately 3 miles from the DCPP site. Studies suggested that the fault could produce a magnitude 7.5 earthquake. Licensing of the plant was initially delayed for at least six months while the USGS and Nuclear Regulatory Commission (NRC), which had by this time replaced the AEC as the federal regulatory agency in charge of nuclear licensing, analyzed the potential effects of the fault on the DCPP.

While the implications of the Hosgri Fault were being debated, another hurdle emerged in 1975. Following initial tests of the plant's cooling water intake and discharge system in the summer of 1974, staff and biologists from the California Department of Fish and Wildlife and PG&E discovered hundreds of dead abalone in Diablo Cove. By 1975, estimates of the number of abalone killed had risen to the thousands. According to a report released by the California Department of Fish and Wildlife, the abalone deaths were the result of toxins produced by a reaction between salt in the seawater and copper alloy tubing used in the plant's cooling system. Completion of the plant was stalled while PG&E replaced the roughly six million feet of copper alloy tubing in the cooling system with titanium tubing. To address environmental concerns about the impacts of the nuclear plant on the ecology of the Intake Cove and Diablo Cove, a biological testing lab was also added on a small spit of land where the east breakwater met the coastline.

This lab remained in use until the 1990s and was demolished in the 2000s, though some concrete remnants, including steps to the ocean, remain.

In April 1976, the NRC issued its decision on the question of seismic safety at DCP, as originally designed, and announced that the plant would need to be seismically retrofitted to be considered safe for operation. Several years of modifications followed, including adding concrete buttresses along the west side of the Turbine Building; the buttresses were then enclosed in what appears as two one-story additions along the Turbine Building's west façade. The discovery of the Hosgri Fault prompted the first demonstration against completion of DCP. In February 1976, eight demonstrators, on a march to Washington, D.C. to protest nuclear power, were arrested at the Diablo Canyon plant site.

Meanwhile, PG&E's property holdings surrounding the DCP expanded in the latter half of the 1970s. In 1974, Robert Marre declared bankruptcy and defaulted on the loan that PG&E had underwritten in 1967 as part of the original lease agreement for the plant. In 1977, a federal court granted PG&E a 99-year lease on the original 585 acres that PG&E had leased from the Marre family, as well as an additional 3,800 acres of Marre family land that surrounded it and partially had been used to back the 1967 lease agreement.

In July 1978, the NRC decided that seismic retrofit work at the DCP had been completed and the plant was safe to operate. The plant still needed to be licensed by the NRC Safety and Licensing Board before it could begin commercial operation.

On March 28, 1979, the worst nuclear accident in the United States' history occurred when one of the reactors at the Three Mile Island Nuclear Generating Station in Pennsylvania experienced a partial meltdown. In response, California Governor Jerry Brown asked the NRC to immediately halt the licensing of DCP so that studies of what had happened at Three Mile Island could be completed and continuing concerns about the safety of the Diablo Canyon plant's operations could be addressed. Due to safety questions that had been raised by the Three Mile Island incident, the NRC ordered a temporary moratorium on the licensing of all nuclear power plants in the United States in November 1979. Once new safety regulations and emergency standards were adopted, the moratorium was lifted, and licensing was allowed to continue. In February 1981, the NRC announced that licensing for the Diablo Canyon plant would be delayed at least until March 1982 while the agency reviewed an emergency plan that had been prepared for the plant in response to the Three Mile Island incident.

A historic aerial photograph taken in 1981 reveals the extent of construction that had been completed at the DCP up to this point (see Figure 4.5-1). The main power block buildings for Unit 1 and Unit 2 were complete. A security building used to screen visitors had been erected immediately to the southeast of the Turbine Building. More than a dozen support buildings and structures of varying sizes were clustered in a wedge-shaped area further to the south in Zones 2 and 5, most of which no longer exist. Two large warehouses were located to the east of this wedge of buildings in Zone 6 (no longer existing). At the far southeast edge of the plant campus, an outdoor firing range and large warehouse had been built to the northwest of the concrete batch plant.

Figure 4.5-1. 1981 Historical Aerial Photograph of the DCPP Site



Source: Page & Turnbull, 2022 (see Appendix F).

The west breakwater was partially destroyed during storms in 1981. The damaged breakwater is visible in the 1981 aerial photograph above. Coastal engineer Omar Lillevang was hired to help redesign and update the east and west breakwaters to withstand future storms. Lillevang had also worked on the coastal design aspects of several other nuclear power plants, including the San Onofre Nuclear Generating Station. Using Lillevang’s innovative physical model studies, the breakwaters were successfully rebuilt.

In September 1981, the NRC Safety and Licensing Board certified the seismic retrofit work previously completed in 1978, and PG&E was issued a license for low-level testing at DCPP. The license would allow for nuclear fuel to be loaded into the reactors to begin testing the plant at five percent capacity, below the level to generate commercial power. Then, during an NRC-sanctioned review of the plant, it was discovered that the wrong blueprints had been used to

build supports for the plant's cooling pipe system. Apparently, blueprints for Unit 2, still under construction, had been used to build safety structures for Unit 1. The NRC ordered exhaustive studies to review the plant's safety structures and systems, since some elements of the two units are the same while others are mirror images. PG&E hired Bechtel Power Corp, which had constructed over half of the nuclear reactors in the United States to that date, to complete this review and oversee necessary modifications. During the review process, Bechtel discovered hundreds of errors, mainly related to earthquake proofing. Modifications to fix the errors were completed in the summer of 1983.

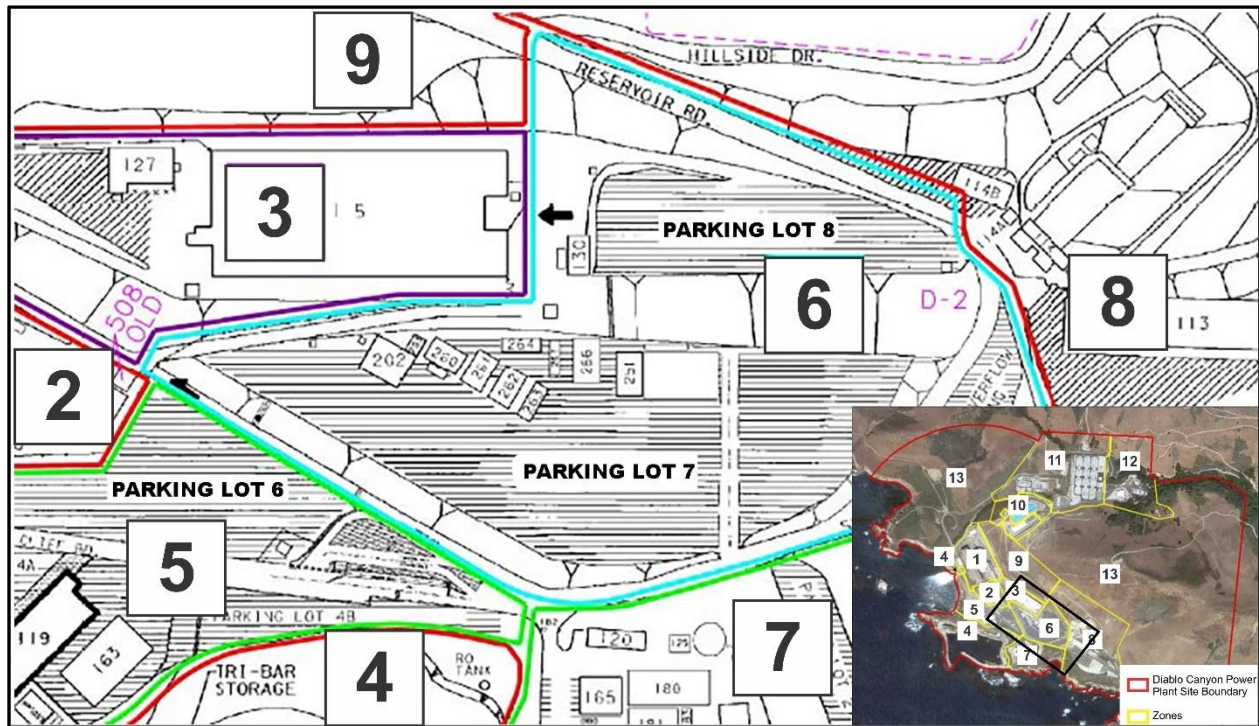
In April 1984, the NRC authorized a second low-level testing license. Although opponents challenged the decision and continued to lobby to stop full licensing for the plant, testing proceeded. Following several months of testing the plant's systems at low power, the NRC finally issued a full-power operating license for the Unit 1 reactor on August 2, 1984. A full-power operating license for the Unit 2 reactor followed almost exactly one year later on August 26, 1985. Both units went into full commercial operation the year following the issuance of the operating licenses, respectively, thus ending an 18-year saga to complete the plant. DCPP ultimately cost \$5.6 billion dollars to complete.

A large number of support buildings and facilities were added to DCPP around 1985 and 1986, immediately after the plant's operating licenses were issued. These included a multi-story Administration Building, attributed to PG&E designers and built in 1986 with offices for the plant's staff directly to the south of the Turbine Building; the Cold Machine Shop in 1985 near the Administration Building; and the Main Warehouse in 1985 to the northeast of the power block in Zone 3. The architect who signed the drawings on the Main Warehouse and Cold Machine Shop was James M. Leefe, an architect with experience in large-scale industrial facilities and who was Principal of Urban Design at Bechtel Corporation's Commercial and Industrial organization.

As part of the plant's response to the Three Mile Island incident, robust training facilities were constructed to the southeast of the power block in Zone 5 (see Figure 4.5-2). These included a large Training Building, attributed to PG&E designers, which featured a full-scale replica of the reactor control room to help train plant operators, as well as a Maintenance Shop Building, also attributed to PG&E designers, with facilities for training the plant's maintenance staff.

Several water treatment facilities were also installed during this period. A seawater reverse osmosis water desalination plant was added north of the east breakwater. This was accompanied by the completion of additional water treatment facilities adjacent to the raw water reservoirs on the upper terrace to the north of the power block. These water treatment facilities provided fresh water for use by the staff at buildings throughout the property, as well as purified feedwater for use in some of the plant's water systems. At the north side of Parking Lot 7 (see Figure 4.5-2), a series of modular buildings were constructed to provide additional offices, conference rooms, and storage.

Figure 4.5-2. DCPP Decommissioning Zones



Source: Page & Turnbull, 2022 (see Appendix F).

Facilities at the DCPP site have continued to be modified and adapted over the decades since operations began to address evolving regulations and world events. Despite its high profile in the media, the Chernobyl nuclear accident in 1986 did not result in any major physical changes to DCPP; rather, changes were primarily administrative and procedural in nature. The plant’s operational buildings continued to expand and evolve in the late 1980s with the addition of more warehouses, storage, and maintenance facilities.

A historic aerial photograph shows that by 1994 (see Figure 4.5-3), many of the older support buildings, constructed in the fabrication yard east and southeast of the power block, had been demolished and Parking Lot 6 and part of Parking Lot 7 had been completed. The biological testing lab ceased operation in the 1990s and was demolished in the 2000s. Around 1997, an early phase of security modifications was carried out. More extensive security alterations took place in the decade following the September 11, 2001, terrorist attacks, including the construction of security towers and a modern Security Building in 2012. In 2008, the original steam generators inside the containment buildings were replaced and stored inside a specially constructed concrete building on the upper terrace to the northeast of the power block.

In 2011, a nuclear accident at the Fukushima Daiichi Nuclear Power Plant in Japan prompted the creation of a nationwide Diverse and Flexible Coping Strategies, or FLEX, program for operating nuclear plants in August 2012 (NEI, 2012). The FLEX program resulted in the establishment of centers across the United States to respond to nuclear accidents anywhere within the country within 24 hours. In response, the Security Building was gutted and remodeled, and several new storage facilities were added to house necessary equipment in case of such a situation.

**Figure 4.5-3. 1994 Historical Aerial Photograph of the DCPD Site**



Source: Page & Turnbull, 2022 (see Appendix F).

In 2016, PG&E announced a Joint Proposal with several labor and environmental organizations to begin phasing out nuclear power and increase its investment in energy efficiency, renewable energy sources, and energy storage. As part of the proposal, PG&E announced that it would not renew the federal operating licenses for DCPD when they were set to expire in 2024 and 2025, respectively. The CPUC approved PG&E's proposal in 2018, beginning the process of decommissioning the plant. PG&E withdrew its license renewal application from the NRC after the CPUC's approval of the decommissioning proposal.

#### ***Pismo Beach Railyard Site History***

Review of aerial imagery shows that the rail line running through the Pismo Beach Railyard (PBR) was in place as early as 1949. Other portions of PBR appear to have been used for crop production or possibly grazing during this time. Aerial photos from 1956 show PBR with extensive grass, again possibly used for grazing or agricultural needs. Photo documentation from 1962 illustrates the beginning of the property's development and by 1971, most of the infrastructure seen today, such as paved space, access roads, and buildings, were in place.

#### ***Santa Maria Valley Railyard Facility – Betteravia Railyard Site History***

The entirety of the Betteravia Railyard project area corresponds to the industrial component of the historic community of Betteravia, the history of which is directly tied with the Union Sugar



Company, which was incorporated in September 1897. In February 1898, the company contracted with the Pacific Coast Railway to build a spur to the north shore of Guadalupe Lake, where they had acquired a 200-acre tract of land and the Marshultz & Cantrell Company of San Francisco was building their sugar beet processing plant. Cottages for the plant superintendent and half a dozen employees followed soon after. In July 1898, the Southern Pacific Railroad extended a spur from Guadalupe to the sugar refinery, giving the plant access to two railroad systems. The opening of the Union Sugar factory in September 1899 marked the changing of the local business scene and the beginning of growth in the valley itself. In addition to becoming one of the most modern plants, Union Sugar became the oldest operating sugar plant in the United States and produced more beet sugar than any other sugar plant in the country.

The town of Betteravia (named after the French word for sugar beet, *betterave*) eventually consisted of 65 to 70 cottages, most of which were in place by the 1920s, along with a non-denominational church, the company-owned store, a post office, a two-room schoolhouse, and social halls. Maps from 1920 and aerial photographs document that the largest residential area was on the west, where four streets were laid out: Lake Front Avenue, 1st, 2nd, and 3rd. Within this area, the cottages varied in size and architectural elaboration, depending on the company status of the resident. Another residential area centered on the company's factory boarding house (Betteravia Hotel) and the bunkhouses for the field laborers. Sugar beets were originally grown under contract with area farmers, but the company later switched to hiring its own workers, employing Chinese at first, followed by Japanese, and, later, Mexican crews. Further east were the buildings of the Union Sugar Company ranch, fenced off from the industrial plant area. A feedlot, where cattle were fattened for market on discarded beet pulp, was also on-site. An array of sheds and rail sidings lay to the east of the refinery rail to receive open carloads of sugar beets, as well as the coke and Lompoc "lime rock" used in the sugar refining process. Dumping fields for the spent pulp and slaked lime lay to the north of the refinery.

The Union Sugar Company was criticized in some sectors for monopolizing such large, irrigated tracts of the "very best agricultural land," hiring their own (foreign) crews rather than using local labor and funneling most of the profits to stockholders out of the Santa Maria Valley. The refinery's cycle of production was year-round, but with seasonal variation—in 1906 the local press stated, "Beets are planted from October to May, and the factory run extends from the first of June to the end of December." (PG&E, 2021)

The refinery complex continued to grow and undergo modifications as it modernized through the ensuing decades. Betteravia Lake was also affected by the growth of the refinery and the increasing capacity of its output. The Union Sugar Company began draining the lake in 1916 to reclaim additional farmland; by 2001, the only water remaining was "a small pond behind the old factory site." The factory had shut down for an extended time in 1927, after a nematode (round-worm) infestation affected entire beet crops. It remained dormant until 1934 when it switched to processing sugar beets shipped from the Imperial Valley. During World War II, the Betteravia Hotel housed the wives and families of servicemen stationed at Camp Cooke, and German prisoners of war replaced Japanese farm laborers, who had been sent to internment camps. In 1951, the Consolidated Foods Corporation (later the Sara Lee Corporation) acquired the Union Sugar Company. The refinery remained in operation, but the company town dwindled as workers began

to commute to the factory by automobile; the residential area was dismantled in the mid-1960s. The plant closed permanently in August 1993 and was beginning to be dismantled by late 1996.

#### 4.5.1.5 Cultural Resources Data Collection Methodology

##### *Diablo Canyon Power Plant*

**Archaeology.** Applied Earthworks (AE) conducted a cultural resources records search of the DCPP boundary at the Central Coastal Information Center (CCIC) of the California Historical Resources Information System, housed at the University of California, Santa Barbara (PG&E, 2020). Other sources consulted include the following:

- AE’s in-house geographic information system geodatabase with site locations and previous study areas;
- AE’s in-house documentation and previous studies that cover the DCPP site;
- PG&E’s cultural resource library and geospatial database for the DCPP site, which includes a comprehensive records search from the CCIC, covering DCPP;
- California Office of Historic Preservation: California Historical Landmarks—San Luis Obispo County;
- California Office of Historic Preservation, California Historical Resources—San Luis Obispo County; and
- the National Register of Historic Places (NRHP).

AE visited and updated eight known sites within the DCPP site between November 16 and 20, 2020. A pedestrian survey was conducted at each site to locate cultural materials. Geospatial data for artifacts, site boundaries, and landscape features were recorded using a submeter-accurate GPS (Arrow Gold RTK GNSS receiver) and the ESRI Collector application. Sites were photographed and described, and full site updates were provided on modern California DPR forms.

**Built Environment.** Page & Turnbull staff reviewed the following sources for information regarding built environment resources within the Project area (Page & Turnbull, 2022 – see EIR Appendix F):

- Built Environment Resource Directory for San Luis Obispo County
- PG&E Facility Database provided to Aspen Environmental Group

In April 2022, Page & Turnbull completed a Historic Built Environment Evaluation Report to evaluate the eligibility of the DCPP site for listing on the NRHP and the California Register of Historical Resources (see EIR Appendix F). Page & Turnbull prepared the report using books, journal articles, and other pieces of scholarly literature about the history of the DCPP site, nuclear power, and the environmental movement, as well as various online sources including Newspapers.com and the websites of the NRC and World Nuclear Association. Key primary sources consulted and cited included historic photographs from the PG&E archives, historic aerial photographs, and historical newspapers. Inquiries were made to the University of California, Berkeley’s Environmental Design Archives and to the Oregon Historical Society Research Library

for information regarding Wurster, Bernardi, and Emmons and Pietro Belluschi, respectively, and their involvement as architects in the original plant design.

On September 23 and 24, 2021, Page & Turnbull architectural historians visited the property and recorded existing buildings and built environment features within the DCPD site with photographs and field notes.

### ***Pismo Beach Railyard***

**Archaeology.** AE conducted a cultural resources records search of the PBR site plus a 0.25-mile buffer at the CCIC on January 10, 2019. Primary reference materials included USGS 7.5-minute base maps, site records, report files, and the Directory of Properties in the Historical Properties Data Files. Additionally, AE conducted a pedestrian survey of the PBR site. Most of the east portion of the area is developed and covered with pavement, buildings, railway, access roads, a detention basin, and berm. Paved areas were not surveyed for cultural resources, as cultural materials, if present, are now buried from view.

**Built Environment.** AE conducted a cultural resources records search of the PBR site plus a 0.25-mile buffer at the CCIC on January 10, 2019. Primary reference materials included USGS 7.5-minute base maps, site records, report files, and the Directory of Properties in the Historical Properties Data Files. Additionally, AE conducted a pedestrian survey of the PBR site. Most of the east portion of the area is developed and covered with pavement, buildings, railway, access roads, a detention basin, and berm.

### ***Santa Maria Valley Railyard Facilities***

**Archaeology.** SWCA Environmental Consultants (SWCA) conducted a records search at the CCIC on April 11, 2021 of the Santa Maria Valley Railyard (SMVR) Facilities (PG&E, 2021). This search was limited to resources and reports within a 0.25 -mile radius of the Santa Maria Valley Railyard – Betteravia Industrial Park (SMVR-SB).

The literature review and records search materials contained information on prehistoric and historic era cultural resources previously recorded at the sites and within a 0.25-mile radius. Official maps and records on file at the CCIC were reviewed in addition to the following sources:

- PG&E’s Confidential Cultural Resource Database
- NRHP – Listed Properties
- CRHR
- California Inventory of Historical Resources
- California State Historical Landmarks
- California Points of Historical Interest
- California Office of Historic Preservation Historic Property Directory and Determinations of Eligibility

SWCA also conducted a pedestrian survey of SMVR-SB on April 13, 2021. SWCA conducted the survey using parallel transects spaced no more than 15 meters apart over the SMVR-SB area. All areas of exposed ground surface were examined for the presence of cultural resources.

**Built Environment.** SWCA’s records search and literature review included a search for records related to historic built resources recorded at the SMVR site. In June 2021, SWCA completed a Cultural Resources Constraints Analysis for SMVR to investigate the potential use of the railyards during decommissioning of the DCP. The report incorporated the results of the literature review and records search conducted by SWCA in April 2021, as well as a preliminary evaluation of the sites’ eligibility for listing on the California Register. SWCA also conducted a pedestrian survey of SMVR-SB on April 13, 2021. SWCA conducted the survey using parallel transects spaced no more than 15 meters apart over the SMVR-SB area. All areas of exposed ground surface were examined for the presence of cultural resources.

On September 22, 2021, Page & Turnbull conducted a separate site visit to the SMVR-SB site and photographed the area. Page & Turnbull gathered and reviewed historic aerial photographs of the site from the 1950s to 1970s to determine which, if any, buildings or structures remained from the Union Sugar Company’s period of operation that end in 1951.

#### **4.5.1.6 Cultural Resources Findings Summary**

##### ***Diablo Canyon Power Plant***

**Archaeology.** The records search and literature review conducted by AE gathered 49 studies covering all or part of the DCP site ranging from 1929-2019. The record search established that the prehistoric cultural resources along the Pecho Coast are part of the Rancho Cañada de los Osos y Pecho y Islay Archaeological District (the District), which covers 2,434 acres and includes 106 prehistoric archaeological sites within PG&E’s Diablo lands and Montaña de Oro State Park. Encompassing an approximately 11-mile-long section of the Pecho Coast, the District covers the coastal terrace extending inland from the Pacific Ocean shoreline to the slopes of the Irish Hills. The District was added to the NRHP in 1975 and has the National Registry Information System Identification number 75000477. There have been several updates to the scope of the District since 1975, expanding it to include additional prehistoric cultural sites. The most recent updated nomination, by Price and Clark in 2019, has not yet been approved by the National Historic Resources Commission.

Of the 106 archaeological sites within the District, 22 are considered non-contributing. These 22 sites include 7 resources that lack integrity or have been destroyed by development; 14 sites which appear to date exclusively to the Historic Period, and 1 site of undetermined age. The remaining 84 sites that are contributing elements to the District share not only their geographic locale, but a common prehistory and cultural identity. These sites represent both residential and limited activity sites, and chronometric data indicates that all the sites within the District range in age from the Late Paleo-Indian Period (before 10,000 cal. B.P.) to the Historic Period (180 cal. B.P.) These contributing sites also retain sufficient integrity to be of research value, including their integrity of setting (largely undeveloped area), location (sites are in their original locations and maintain relationship to natural environment), design (sites retain their relationship to each other and functional areas remain intact), materials and workmanship (as seen in the artifacts), feeling and association (inter and intra-site relationships). As such, the District has yielded, and retains its potential to yield, a substantial amount of important information about long-term human occupation and use over the past millennia along the Pecho Coast.

Within the DCPD site, 10 previously recorded prehistoric archaeological sites were identified during the records search and review. Eight of these are contributing features of the District, automatically making them eligible for the CRHR. Two of these known prehistoric sites (CA-SLO-2 and CA-SLO-61) are within the area of proposed decommissioning activities (see Table 4.5-1).

**Table 4.5-1. Cultural Resources within DCPD Project area**

Trinomial No.	Description	District Contributor	CRHR Eligible	Within Decommissioning Area
CA-SLO-2	Large prehistoric village site	Yes	Yes	<b>Yes</b>
CA-SLO-61	Prehistoric short-term habitation site	Yes	Yes	<b>Yes</b>
CA-SLO-584	Prehistoric short-term habitation site (destroyed)	No	No	No
CA-SLO-1159	Prehistoric short-term habitation site	Yes	Yes	No
CA-SLO-1160	Prehistoric short-term habitation site	Yes	Yes	No
CA-SLO-1161	Prehistoric short-term habitation site	Yes	Yes	No
CA-SLO-1162	Prehistoric short-term habitation site	Yes	Yes	No
CA-SLO-1163	Prehistoric short-term habitation site (destroyed)	No	No	No
CA-SLO-2865	Prehistoric artifact scatter	Yes	Yes	No
CA-SLO-2866	Prehistoric artifact scatter (possibly connected to CA-SLO-1161)	Yes	Yes	No

Source: PG&E, 2020.

AE did not survey the identified borrow site known as the SE Borrow Site (see Figure 2-30) as part of their technical study; however, the 750-acre DCPD boundary has been surveyed and studied by archaeologists many times throughout the years and no cultural resources have been previously identified within the SE Borrow Site.

CA-SLO-2

CA-SLO-2 is a very large, long-term village site that was intermittently occupied starting in the Paleo-Indian Period, with major occupations in the Paleo-Indian, Millingstone/Lower Archaic, and Middle Periods. There was an occupational hiatus in the Early Period, and a minor occupation during the Late period. The site itself covers 47 acres of the DCPD Project Area and has yielded a wide variety of artifacts from the full span of its occupation. The site was first recorded in 1947, and a small area in the southeastern portion was excavated by Greenwood in 1968 prior to the construction of DCPD. The importance of CA-SLO-2 has been determined individually eligible for listing in the NRHP and CRHR and is a contributing element of the District.

Based on information provided by the November 17, 2020, survey and historical aerial photos, the following disturbances have occurred within the bounds of CA-SLO-2 since the initial development of DCPD: road construction, former wastewater pond/current soil stockpile, former plant construction laydown area, former sand blast area, former substation, existing 230-kV transmission tower, roads, air monitoring station, soldier wall, and redeposited cultural materials. The wastewater pond, with lined drainage and an associated building complex used for security/fire crew training, once covered 5,593 square meters (1.38 acres) along the northeast margin of CA-SLO-2. All facilities and equipment have been relocated, the surface is graded,

capped with fill, and currently serves as a soil stockpile location. The former plant construction laydown yard covers 45,470 square meters (11.23 acres) and appears to have been graded and had vegetation removed. The former sand blast area covers 2,060 square meters (0.5 acres) within the former laydown area, and is distinguished by a concentration of sandblasting grit and granite gravel likely deposited during DCPD construction in the 1970's. The former substation was removed in 1979 and is now comprised of a gravel capped road and fill area at the southeast margin of the site. The existing 230-kV transmission tubular steel pole (TSP) is located at the southeastern edge of the former substation. The area surrounding the base of this TSP has been capped with fill, and the SWCA investigations here in 2019 established an intact archaeological deposit on the southeast side of this transmission TSP. Multiple roads run through CA-SLO-2, including Diablo Creek Road, which was cut well below the cultural layers, capped by fill, and was graded in the east terrace area. The air monitoring station is located along the northeastern margin of the site, adjacent to the large stockpile and lined drainage ditch. The 540-foot long, 2-foot-tall soldier wall was constructed in early 2018 to stabilize the hillside adjacent to Pecho Valley Road, along the eastern portion of CA-SLO-2. It was constructed well below the cultural stratum, and while no cultural material or artifacts were observed in the eroded soils at the time, it was treated as such and redeposited on an abandoned ranch road on the margin of the site. These 60 square meter spoils area is separated from the underlying road by geotextile fabric and is now stabilized by vegetation.

#### CA-SLO-61

CA-SLO-61 is a short-term residential area on the south side of Diablo Creek, within the DCPD Project Area. Initially recorded in 1948, the site was partially excavated in 1972 prior to DCPD construction and was then covered by concrete and buildings. AE conducted small excavations in 2011, during fiber-optic cable installation. At this time the site boundaries were extended to cover a total of 2,215 square meters (0.54 acres), and intact cultural deposits remain in place.

**Built Environment.** The DCPD is not currently listed on the NRHP or CRHR for built environment resources. It is also not listed in the Built Environment Resource Directory database for San Luis Obispo County, as of the March 2020 update. This means no previous evaluations or surveys of the property have been submitted to the California Office of Historic Preservation.

Based on the Facilities Database provided by PG&E, DCPD has approximately 115 buildings and structures at the Project site. Of these, 30 buildings and structures that have a Year Built day of 1985 or earlier remain. The 1985 date corresponds to when the Unit 2 reactor was licensed for full commercial operation and the plant was considered functionally complete. While this is less than 50 years ago, sufficient resources are available to understand DCPD within the context of nuclear power in California and the nation. The April 2022 Historic Built Environment Report prepared by Page & Turnbull (see EIR Appendix F) did not find the DCPD or any of the 30 individual buildings and structures to be eligible for listing on the NRHP or CRHR. Thus, no eligible historic resources have been identified at the DCPD site.

#### ***Pismo Beach Railyard***

**Archaeology.** The record search conducted by AE identified 108 previous studies within the 0.25-mile radius of the PBR, with 23 previous studies that covered all, a part, or are directly

adjacent to the PBR area. The record search results also show seven recorded archaeological sites, and two historical built-environment resources within the 0.25-mile radius. Two of the previously recorded archaeological sites (CA-SLO-81 and CA-SLO-832) fall within the PBR area and are listed in Table 4.5-2.

During the pedestrian survey, three areas were found to contain cultural materials ranging from exposed shell midden to an artifact scatter. All three concentrations are associated with either CA-SLO-81 or CA-SLO-832. The only decommissioning activity proposed within the PBR site is to replace approximately 1,100 feet of track, wood railroad ties, and adding gravel on the northeast side of the site. CA-SLO-81 and CA-SLO-832 are both located far outside any proposed upgrades and therefore would not be in the area of the proposed activities.

**Table 4.5-2. Cultural Resources within Pismo Beach Rail Yard Project area**

Trinomial No.	Description	District Contributor	CRHR Eligible	Within Decommissioning Area
CA-SLO-81	Large prehistoric artifact scatter	No	Unevaluated	No
CA-SLO-832	Prehistoric habitation site	No	Yes	No

Source: PG&E, 2020.

**Built Environment.** The record search and site survey conducted by AE identified two historical built-environment resources within the 0.25-mile radius. No known built-environment resources were identified within the Pismo Beach Railyard Facility.

***Santa Maria Valley Railyard Facility***

**Archaeology.** The CCIC records search conducted by SWCA revealed that there are no previous studies and no previously documented cultural resources are within the SMVR-SB site.

The SMVR-SB site area was subject to a pedestrian survey which did not yield any archaeological resources within or adjacent to the SMVR-SB site, and no archaeological features were identified during the pedestrian survey.

**Built Environment.** At SMVR-SB, few built resources remain from the Union Sugar Company's period of operations, which started in 1898 and ended in 1951 when Consolidated Foods Corporation acquired the Union Sugar Company. The residential area for workers was demolished in the mid-1960s. Once the plant closed in 1993, its dismantling began in 1996. A comparison of historic photographs with current buildings indicates that the main factory building no longer exists. At most, two warehouse buildings may remain from the Union Sugar Company period, which would not be sufficient for the property to have integrity as an eligible historical resource.

**4.5.2 Regulatory Setting**

Numerous laws and regulations require state and local agencies to consider the effects a project may have on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. The various federal and state laws, regulations, and policies are presented in Appendix C.

**San Luis Obispo County General Plan.** Two elements of the San Luis Obispo County General Plan include policies regarding the management of cultural resources: the Land Use Element (San Luis Obispo, 2007) and the Conservation and Open Space Element (San Luis Obispo, 2010). The relevant policies are described below.

***San Luis Obispo County Land Use Element – Local Coastal Program***

- **Policy 1: Protection of Archaeological Resources.** The County shall provide for the protection of both known and potential archaeological resources. All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored at the time of a development proposal to avoid development on important archaeological sites. Where these measures are not feasible and development will adversely affect identified archaeological or paleontological resources, adequate mitigation shall be required.
- **Policy 2: Vandalizing of Resources Activities.** Other than development, which could damage or destroy archaeological sites, including off-road vehicle use on or adjacent to known sites and unauthorized collecting of artifacts, shall be prohibited.
- **Policy 3: Identification of Archaeological Sites.** The County shall establish and maintain archaeological site records of data files about known sites. These sensitive areas shall be defined as follows:
  - Within rural areas, the County maintains on file a parcel number list of known sites as prepared and updated by the California Archaeological Site Survey Office.
  - Within urban areas, the County shall maintain maps in the Land Use Element (combining designation) which reflect generalized areas of known sites. These maps shall be prepared by the California Archaeological Site Survey Regional Office.
- **Policy 4: Preliminary Site Survey for Development within Archaeologically Sensitive Areas.** Development shall require a preliminary site survey by a qualified archaeologist knowledgeable in Chumash culture prior to a determination of the potential environmental impacts of the project.
- **Policy 5: Mitigation Techniques for Preliminary Site Survey before Construction.** Where substantial archaeological resources are found as a result of a preliminary site survey before construction, the County shall require a mitigation plan to protect the site. Some examples of specific mitigation techniques include:
  - Project redesign could reduce adverse impacts of the project through relocation of open space, landscaping or parking facilities.
  - Preservation of an archaeological site can sometimes be accomplished by covering the site with a layer of fill sufficiently thick to insulate it from impact. This surface can then be used for building that does not require extensive foundations or removal of all topsoil.
  - When a project impact cannot be avoided, it may be necessary to conduct a salvage operation. This is usually a last resort alternative because excavation, even under the best conditions, is limited by time, costs and technology. Where the chosen mitigation measure necessitates removal of archaeological resources, the county shall require the evaluation



and proper deposition of the findings based on consultation with a qualified archaeologist knowledgeable in the Chumash culture.

- A qualified archaeologist knowledgeable in the Chumash culture may need to be on-site during initial grading and utility trenching for projects within sensitive areas.
- Policy 6: Archaeological Resources Discovered during Construction or through Other Activities. Where substantial archaeological resources are discovered during construction of new development, or through non-permit related activities (such as repair and maintenance of public works projects) all activities shall cease until a qualified archaeologist knowledgeable in the Chumash culture can determine the significance of the resource and submit alternative mitigation measures.

### ***San Luis Obispo County Conservation and Open Space Element***

#### Goals

- Goal CR 1. The County will have a strong, positive community image that honors our history and cultural diversity.
- Goal CR 2. The County will promote public awareness and support for the preservation of cultural resources in order to maintain the county's uniqueness and promote economic vitality.
- Goal CR 3. The County's historical resources will be preserved and protected.
- Goal CR 4. The County's known and potential Native American, archaeological, and paleontological resources will be preserved and protected.

#### Policies

- Policy CR 1.1 Cultural Identity. Establish and support programs that enhance the county's sense of community and identity, such as the collection of oral histories, cultural and genealogical research, and the acquisition of collections of historic artifacts, documents, and memorabilia relevant to the history of the county.
- Policy CR 2.1 Community Participation. The County will actively promote and support community participation in the preservation and enhancement of the county's culture and history.
- Policy CR 2.2 Acquisition. The County encourages and supports acquisition by public agencies or historical or conservation organizations of the most important archaeological and cultural sites from willing sellers.
- Policy CR 2.3 "Living Resources". Preserve historic sites and buildings and recognize cultural and archaeological resources as "living resources" that are part of a continuing culture.
- Policy CR 3.1 Historic Preservation. The County will provide for the identification, protection, enhancement, perpetuation, and use of features that reflect the County's historical, architectural, Native American, archaeological, cultural, and aesthetic heritage.
- Policy CR 3.2 Historic Preservation Programs. The County supports and encourages historic preservation activities. County agencies should cooperate and coordinate their activities with preservation activities.

- Policy CR 3.3 Remodeling and Reconstruction. Maintain and enhance the historic character of the county by establishing review procedures for the remodeling and reconstruction of buildings and other structures consistent with the Secretary of the Interior’s Standards
- Policy CR 4.1 Non-development Activities. Discourage or avoid non-development activities that could damage or destroy Native American and archaeological sites, including off-road vehicle use on or adjacent to known sites. Prohibit unauthorized collection of artifacts.
- Policy CR 4.2 Protection of Native American Cultural Sites. Ensure protection of archaeological sites that are culturally significant to Native Americans, even if they have lost their scientific or archaeological integrity through previous disturbance. Protect sites that have religious or spiritual value, even if no artifacts are present. Protect sites that contain artifacts, which may have intrinsic value, even though their archaeological context has been disturbed.
- Policy CR 4.3 Cultural Resources and Open Space. The County supports the concept of cultural landscapes and the protection and preservation of archaeological or historical resources as open space or parkland on public or private lands.
- Policy CR 4.4 Development Activities and Archaeological Sites. Protect archaeological and culturally sensitive sites from the effects of development by avoiding disturbance where feasible. Avoid archaeological resources as the primary method of protection.
- Policy CR 4.6 Resources-Based Sensitivity. Protect archaeological resources near streams, springs and water sources, rock outcrops, and significant ridgetops, as these are often indicators of the presence of cultural resources.

**San Luis Obispo County Code.** Two titles of the San Luis Obispo County General Ordinances include municipal codes regarding the management of cultural resources: Title 22- Land Use Ordinance (San Luis Obispo, 2014) and Title 23- Coastal Zone Land Use (San Luis Obispo, 2014). The relevant ordinances are summarized below.

***Title 22- Land Use Ordinance***

22.10.040 - Archaeological Resources.

In the event archaeological resources are unearthed or discovered during any construction activities, the following standards apply:

- Construction activities shall cease, and the Department shall be notified so that the extent and location of discovered materials may be recorded by a qualified archaeologist, and disposition of artifacts may be accomplished in accordance with state and federal law.
- In the event archaeological resources are found to include human remains, or in any other case when human remains are discovered during construction, the County Coroner shall be notified in addition to the Department so proper disposition may be accomplished.

22.14.080 - Historic Site (H).

Purpose. The Historic Site (H) combining designation is applied to recognize the importance of archaeological sites and historic sites, structures, and areas important to local, state, or national history. These standards are intended to protect archaeological resources, historic structures,

and sites by requiring new uses and alterations to existing uses to be designed with consideration for preserving and protecting these resources.

***Title 23- Coastal Zone Land Use***

**23.07.104- Archaeologically Sensitive Areas.**

To protect and preserve archaeological resources, the following procedures and requirements apply to development within areas of the coastal zone identified as archaeologically sensitive.

- Archaeologically sensitive areas. The following areas are defined as archaeologically sensitive:
  - Any parcel within a rural area which is identified on the rural parcel number list prepared by the California Archaeological Site Survey Office on file with the county Planning Department.
  - Any parcel within an urban or village area which is located within an archaeologically sensitive area as delineated by the official maps (Part III) of the Land Use Element.
  - Any other parcel containing a known archaeological site recorded by the California Archaeological Site Survey Office.
- Preliminary site survey required. Before issuance of a land use or construction permit for development within an archaeologically sensitive area, a preliminary site survey shall be required. The survey shall be conducted by a qualified archaeologist knowledgeable in local Native American culture and approved by the Environmental Coordinator. The County will provide pertinent project information to the Native American tribe(s).
- When a mitigation plan is required. If the preliminary site survey determines that proposed development may have significant effects on existing, known or suspected archaeological resources, a plan for mitigation shall be prepared by a qualified archaeologist. The County will provide pertinent project information to the Native American tribe(s) as appropriate. The purpose of the plan is to protect the resource. The plan may recommend the need for further study, subsurface testing, monitoring during construction activities, project redesign, or other actions to mitigate the impacts on the resource. Highest priority shall be given to avoiding disturbance of sensitive resources. Lower priority mitigation measures may include use of fill to cap the sensitive resources. As a last resort, the review authority may permit excavation and recovery of those resources. The mitigation plan shall be submitted to and approved by the Environmental Coordinator and considered in the evaluation of the development request by the Review Authority.
- Archaeological resources discovery. In the event archaeological resources are unearthed or discovered during any construction activities, the standards of Section 23.05.140 of this title shall apply. Construction activities shall not commence until a mitigation plan, prepared by a qualified professional archaeologist reviewed and approved by the Environmental Coordinator, is completed and implemented. The County will provide pertinent project information to the affected Native American tribe(s) and consider comments prior to approval of the mitigation plan. The mitigation plan shall include measures to avoid the resources to the maximum degree feasible and shall provide mitigation for unavoidable impacts. A report verifying that the approved mitigation plan has been completed shall be submitted to the Environmental Coordinator prior to occupancy or final inspection, whichever occurs first.

**Santa Barbara County Comprehensive Plan, Land Use Element.** The Land Use Element identifies policies to protect and avoid impacts associated with historical, archaeological, and cultural sites (Santa Barbara, 2016). 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 and Local Coastal Program.** The City’s General Plan identifies policies for the protection of archaeological, paleontological, and cultural resources, which includes standards for the investigation of known resources and when construction must be suspended (Pismo Beach, 2014).

### 4.5.3 Significance Criteria

The significance criteria listed below are used to determine whether a project or alternatives would result in significant impacts under CEQA related to cultural resources. These criteria are based on State CEQA Guidelines Appendix G. Under CEQA, the Proposed Project would cause a significant impact if it caused a substantial adverse change in the significance of a historical resource, an archaeological resource, or a tribal cultural resource as defined under CCR, Title 14, Chapter 3, Section 15064.5.

The Proposed Project would have a significant impact on these cultural resources if it would:

- Physically alter, damage, or cause destruction of all or a part of a historical or archaeological resource.
- Demolish or materially alter in an adverse manner those physical characteristics of a historical resource that convey its significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources, inclusion in a local register of historical resources, or its determination to be a historical resource by a CEQA lead agency.
- Demolish or materially alter in an adverse manner those physical characteristics of an archaeological artifact, site, or object that enable it to meet the definition of a unique archaeological resource under CEQA.
- Disturb any human remains, including those interred outside of formal cemeteries.

### 4.5.4 Environmental Impact Analysis and Mitigation

**Impact CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5 (Class I: Significant and Unavoidable).**

#### Phase 1

Phase 1 of decommissioning at the DCPD site generally includes the removal of utilities, demolition of existing buildings, removal of security fencing, removal of the road segment west of the security fence at the Discharge Structure, removal of the guard rails along the road segment, and demolition of the Discharge Structure. All activities are ground disturbing and require the use of conventional excavation equipment.

The railyard activities would include refurbishment of 1,100 feet of an existing spur rail at the PBR site. At SMVR-SB site the proposed decommissioning activities include the refurbishment of existing rail spurs, use of steel road plates or installation of engineered fill to accommodate trucks, and the installation of perimeter fencing. No ground disturbing activities that would impact native soils are proposed in either of the railyards.

### ***Archaeology***

#### **DCPP Project Site**

As described above in Section 4.5.1.6, *Cultural Resources Findings Summary*, there are 10 previously recorded prehistoric archaeological sites within the DCPD site, eight of which are contributing features of a larger NRHP Nominated District, automatically making them eligible for the CRHR, and are considered historical resources under CEQA. Two of these known prehistoric sites (CA-SLO-2 and CA-SLO-61) are within the area of proposed decommissioning activities, but outside of the Discharge Structure removal area and any identified cut or fill areas as shown in Figure 2-33 in Section 2, *Project Description*.

**CA-SLO-2.** Phase 1 decommissioning activities within CA-SLO-2 include removal of an existing 230 kV TSP and the removal of two guy wire anchors directly adjacent to that pole. CA-SLO-2 was subjected to immense disturbance in certain areas during construction of the DCPD. These disturbances included, but are not limited to, the construction of access roads throughout CA-SLO-2, construction of a substation, grading of a laydown area, and the deposit of sand blast grit from DCPD construction. The existing 230 kV TSP and guy wire anchors are located within the boundary of the former substation and the sand blast grit is located within the boundary of the former laydown area.

Under the Proposed Project, both the existing TSP and guy wire anchors would be removed to grade, and all subsurface footings would be abandoned in place. No excavations would occur to remove the TSP or guy wires. Therefore, Phase 1 decommissioning activities would not directly or indirectly impact CA-SLO-2, nor would these proposed activities impact the NRHP Nominated District.

**CA-SLO-61.** Phase 1 decommissioning activity within CA-SLO-61 includes removal of an existing security fence that surrounds the Turbine Building and Unit 1 and Unit 2 reactors. A portion of the existing security fence is within the boundary of CA-SLO-61. The security fence would be removed to grade, and the existing fence post footings would be removed by being pulled directly out of the ground without excavating around them, then backfilled with clean fill. Alternately, the fence footings known to be within the site boundaries could be abandoned in place with only the top 3 to 6 inches of the footing removed below grade to allow for a consistent grade and eventual paving. Since these activities would not involve the excavation of soils, these proposed activities would not directly nor indirectly impact known human remains within CA-SLO-61. Additionally, the existing asphalt access road that runs west of the security fence would be removed, along with its associated guard rails. Removal of the access road would involve the removal of only the asphaltic concrete (surface) course or layer and any asphalt or cement concrete curbs. The aggregate subbase and base course would be left in place for incorporation into the grading work. The guard rail footings would be removed in the same manner as the

security fence footings, by either being pulled directly out of the ground without excavating around them, then backfilled with clean fill or abandoned in place.

Since removal of the security fence and footings and the removal of the existing access road, guard rail, and guard rail footings would only take place superficially in previously disturbed soils and would not require any new ground disturbance in intact native soil, the proposed Phase 1 decommission activities would not directly or indirectly impact CA-SLO-61, nor would these proposed activities impact the NRHP Nominated District.

### Railyards

**Pismo Beach Railyard.** The activities proposed at the PBR site include refurbishment of 1,100 feet of existing spur rail, as well as replacing railroad ties and some gravel to the northeast section of rail line. Refurbishing the rail line is limited to the existing footprint and would not encroach on any intact native soils. Two previously recorded sites are within the PBR boundary, CA-SLO-81 and CA-SLO-863. CA-SLO-81 is an unevaluated site but is assumed eligible for the purposes of CEQA, while CA-SLO-863 is a CRHR eligible resource; thus, both sites are considered historical resources. CA-SLO-81 and CA-SLO-832 are both located far west of the proposed spur rail refurbishment activity, and therefore would not be directly or indirectly impacted by the proposed activities.

**SMVR-SB.** Activities proposed for the SMVR-SB railyard include refurbishment of existing rail spurs, use of steel road plates or installation of engineered fill, and installation of perimeter fencing. No excavations would occur at the railyard. No known historical resources were identified through a record search or pedestrian survey within the SMVR-SB boundary. Therefore, no historical resources would be impacted.

### ***Built Environment***

#### DCPP Project Site

As stated in Section 4.5.1.6, the results of the cultural resources records search identified no previously known historic-age built resources in the DCPP site. The April 2022 Historic Built Resources Environment Report (EIR Appendix F) evaluated the eligibility of the DCPP for listing on the NRHP and CRHR.

With no individual buildings or structures, nor the DCPP constructed infrastructure as a whole, meeting any criteria for listing on the NRHP or CRHR, the DCPP site does not contain any historical resource for the purposes of CEQA. As there would be no direct or indirect impacts on historical resources, the Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Therefore, no impact to historical resources would occur.

### Railyards

**Pismo Beach Railyard.** The activities proposed at the PBR site include refurbishment of 1,100 feet of existing spur rail, as well as replacing railroad ties and some gravel to the northeast section of rail line. Refurbishing the rail line is limited to the existing footprint and would not encroach on

any intact native soils. No known historical resources were identified through a records search or pedestrian survey within the Pismo Beach Railyard. Therefore, no impact to historical resources would occur.

**SMVR-SB.** Activities proposed for the SMVR-SB railyard include refurbishment of existing rail spurs, use of steel road plates or installation of engineered fill, and installation of perimeter fencing. No subsurface excavations are proposed. No known historical resources were identified through a record search or pedestrian survey within the SMVR-SB boundary. Therefore, no impact to historical resources would occur.

### ***Unanticipated Buried Resources***

As with any project that involves ground disturbing activity, there is the potential for unknown buried resources to be encountered within the DCPD site. Inadvertent disturbance or destruction of an unidentified cultural resource, that could be considered a historical resource, could damage or destroy the resource or change its context. Due to the sensitive nature of the DCPD site, the potential for encountering unanticipated buried resources is highly probable even in previously disturbed areas. If an unanticipated buried resource is encountered, and if the currently unidentified resource were determined to be eligible for listing in the CRHR, the Proposed Project activities could result in a significant impact to the resource. PG&E would conduct awareness training as part of the Proposed Project (AC CR-2, *Worker's Environmental Awareness Training – Cultural and Paleontological Resources*); however, this training would focus more on paleontology. MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), and MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*) are recommended to lessen the overall impact, however, not to a less than significant level. Therefore, impacts to unanticipated buried resources are considered significant and unavoidable (Class I).

### **Phase 2**

Phase 2 activities include continued demolition of the Discharge Structure, soil remediation, backfilling, grading, removal of the Avila Gate and Guard House Facilities (at Avila Beach Drive/Diablo Canyon Road), and landscaping in order to restore the DCPD site to natural conditions as well as continued operations (use of the Security Building, and indoor Firing Range). Phase 2 also proposes to establish a blufftop road at the end of DCPD decommissioning to connect Shore Cliff Road with North Ranch Road/Pecho Valley Road. No Phase 2 activities involving ground disturbing activities are proposed within the PBR or SMVR-SB sites.

### ***Archaeology***

#### DCPD Project Site

As described above, two historical resources (CA-SLO-2 and CA-SLO-61) are located within the area of proposed Phase 2 activities but outside of the Discharge Structure removal area. Soil

remediation of an approximately 2,060 square foot former sand blast area may occur within the boundaries of CA-SLO-2, which could significantly impact the site. PG&E would not know if this area needs to be remediated until after Units 1 and 2 cease operating, when they complete a soil characterization study. Due to immense grading and use of CA-SLO-2 as a laydown area for the construction of DCP, the site is heavily disturbed. Superficial soil remediation of a heavily disturbed portion of the site would not significantly impact the sites integrity. However, given the sensitivity of this site, if soil remediation extends into native soils under the former sand blast area, which potentially could have intact deposits, these deposits could be damaged or destroyed resulting in a potentially significant impact to the sites integrity. PG&E would complete awareness training as part of the Proposed Project (AC CR-2, *Worker’s Environmental Awareness Training – Cultural and Paleontological Resources*); however, this training focuses more on paleontology. Therefore, implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), and MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*) would lessen the overall impact, however, not to a less than significant level. Therefore, impacts are considered significant and unavoidable (Class I).

### ***Built Environment***

With no specifically identified individual buildings or structures, nor DCP as a whole, meeting the criteria for listing on the NRHP or CRHR, the DCP site does not contain any historical built environment resource(s) for the purposes of CEQA. As there would be no direct or indirect impacts on built environment historical resources, the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Therefore, no historical built environment resources would be impacted.

### ***Unanticipated Buried Resources***

Due to the sensitive nature of the DCP site, the potential for encountering unanticipated buried resources is highly probable even in previously disturbed areas. In the event an unanticipated buried resource is encountered during Phase 2 activities, and if the currently unidentified resource were determined to be eligible for listing in the CRHR, the Proposed Project activities could result in a significant impact to the resource. PG&E would complete awareness training as part of the Proposed Project (AC CR-2, *Worker’s Environmental Awareness Training – Cultural and Paleontological Resources*); however, this training focuses more on paleontology. Therefore, implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*), and MM CUL-10 (*Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House*



*Facilities*) would lessen the overall impact, however, not to a less than significant level. Therefore, impacts are considered significant and unavoidable (Class I).

### ***Post-Decommissioning Operations***

**New Facility Operations.** Following Phase 2, activities at the DCPD site associated with the Proposed Project include operation of the new GTCC Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. Project operations do not have the potential to directly impact known historical resources as decommissioning activities would be completed.

**Future Actions.** If the Marina is operated by a third party, public restrooms would be provided and supported by a septic and dispersal system that is appropriately sized for the Marina uses. PG&E's expectation is these wastewater systems would be located within existing developed areas of the DCPD site. Given the sensitivity of the DCPD site, any ground disturbance could cause impacts to unknown buried resources. Additionally, permitting and use of the Marina by a third party could cause indirect impacts to known historical resources, since members of the public would be allowed to explore the area and could stumble upon a known significant resource, increasing the risk of looting. The long-term effects of looting could significantly impact known historical resources. Establishing Environmentally Sensitive Areas (ESAs) and restricting public access through physical barriers and signage would limit the potential for the public to identify historical resources. Therefore, implementation MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), MM CUL-10 (*Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities*) and MM CUL-11 (*Restrict Access to Environmentally Sensitive Areas During Marina Operations*) would reduce the direct and indirect impacts to less than significant (Class II).

### **Mitigation Measures for Impact CUL-1.**

**CUL-1 Retain County-qualified Project Archaeologist.** Prior to issuance of any County Grading or Construction Permit, a Project Archaeologist whose training and background conforms to the US Secretary of the Interior's Professional Qualifications Standards, as published in Title 36, Code of Federal Regulations, part 61 (36 C.F.R., part 61) shall be retained by the Applicant or its designee to prepare and implement a Cultural Resources Monitoring and Discovery Plan, the Cultural Resources Environmental Awareness Training, and manage all cultural resources monitoring, mitigation, and curation activities for the Project. The qualifications of the Project Archaeologist shall be appropriate to the needs of the Project and demonstrate prior experience on the Central Coast of California. A copy of the Project Archaeologist's qualifications shall be provided to the County of San Luis Obispo Planning and Building Department (County) for review and approval. The Project Archaeologist's qualifications shall be provided by the County to the Tribes designated point of contact with whom the County conducted Assembly Bill (AB) 52 consultation for the Project (hereinafter

referred to as “appropriate consulting Tribes”) for review and comment prior to approval by the County.

**CUL-2 Retain County-qualified Project Archaeological Monitors.** Prior to issuance of any County Grading or Construction Permit, Project Archaeological Monitors shall be retained by the Applicant or its designee to assist in the monitoring, mitigation, and curation activities for the Project. The Monitors shall have the following minimum qualifications:

1. A BS or BA degree in anthropology, archaeology, historic archaeology, or a related field and two years’ experience monitoring in California including demonstrated experience with coastal cultural resources. Preference will be given to those with demonstrated experience along the coast of Central California; or
2. An AS or AA degree in anthropology, archaeology, historic archaeology, or a related field and four years’ experience monitoring in California including demonstrated experience with coastal cultural resources. Preference will be given to those with demonstrated experience along the coast of Central California; or
3. A BS or BA degree and enrollment in graduate level classes pursuing a Master’s degree in the fields of anthropology, archaeology, historic archaeology, or a related field and two years of monitoring experience in California including demonstrated experience with coastal cultural resources. Preference will be given to those with demonstrated experience along the coast of Central California. If the Monitor’s undergraduate degree is not in anthropology, archaeology, or a related field, two graduate classes in anthropology or archaeology must have been completed prior to the Monitor working on site.

A Monitor with a degree in historic archaeology must also have completed coursework in anthropology or archaeology and have demonstrated experience monitoring for California prehistoric archaeological resources.

A copy of each Monitor’s qualifications shall be provided to the County for review and approval. Each Monitor’s qualifications shall be provided by the County to the appropriate consulting Tribes for review and comment prior to approval by the County.

**CUL-3 Retain Chumash Tribal Monitors.** Prior to issuance of any County Grading or Construction Permit, Chumash Tribal Monitors from appropriate consulting Tribes shall be retained by the Applicant or its designee to assist in the monitoring, mitigation, and curation activities for the Project.

**CUL-4 Retain a Project Osteologist.** Prior to issuance of any County Grading or Construction Permit, a Project Osteologist shall be retained by the Applicant or its designee to assist in the identification of any human remains. The Project Osteologist shall have the following minimum qualifications:

1. A graduate degree in archaeology, forensic anthropology, or related discipline, with four years’ experience working with archaeological and Tribal Cultural resources in California.

If an Osteologist with four years' experience is not available, a candidate with no less than two years' experience may be considered.

A copy of the Project Osteologist's qualifications shall be provided to the County for review and approval. The Project Osteologist's qualifications shall be provided by the County to appropriate consulting Tribes for review and comment prior to approval by the County.

**CUL-5 Develop a Cultural Resources Monitoring and Discovery Plan.** Prior to issuance of any County Grading or Construction Permit, the Project Archaeologist shall develop and submit a Cultural Resources Monitoring and Discovery Plan (CRMDP) to the County for review and approval. No ground disturbing activities can occur until the CRMDP is approved by the County. A draft of the CRMDP shall be provided by the County to the appropriate consulting Tribes and an independent third-party County-qualified archaeologist for a 45-day review and comment period. No ground disturbance can occur before approval of any construction-related permits by the County.

At a minimum, the CRMDP shall include the following:

- An introduction outlining the project description, purpose for monitoring, summary of resources studies or description of known resources, anticipated construction schedule, anticipated impacts to cultural resources, curation and treatment options. Permanent curation of Tribal Cultural Resources will not take place unless approved in writing by the appropriate consulting Tribes.
- A description of the monitoring personnel involved with the Project (Project Archaeologist, Archaeological Monitors, and Chumash Tribal Monitors) and their responsibilities, which shall include but are not limited to:
  - A list of personnel involved in the monitoring activities and their availability;
  - A description of how the monitoring shall occur;
  - A description of how the monitoring schedule will be developed and implemented given that different areas of ground disturbance may occur simultaneously;
  - A description of what resources are expected to be encountered and where they are expected to be encountered; and
  - A description of monitoring reporting procedures.
- A description of the Cultural Resources Worker Environmental Awareness Program training (see MM CUL-6) and when and how that will take place.
- Identification of the areas on the site, plus a buffer, where earthwork and site disturbance will be avoided. This should include the following:
  - A description of the exclusion zone which shall be placed around each avoidance area and labeled as "Environmentally Sensitive Area" in all relevant project documents and engineering drawings, as needed. Environmentally Sensitive Areas shall exclude all construction equipment and personnel. Exclusion zone fencing

shall be installed prior to any site disturbance (and later removed) under the direction of the Project Archaeologist in consultation with the County and the appropriate consulting Tribes. The construction contractor will be responsible for maintaining the exclusion zone fencing throughout the duration of decommissioning.

- Definition and description of authorities, protocols, and procedures for halting and/or pausing work in order to record, evaluate, and identify any necessary treatment for any cultural resources encountered. This shall include protocols for ensuring all treatment or recovery of cultural resources is completed prior to work resuming in the area of the find.
- Information that the Project Archaeologist, Archaeological Monitor(s), and the Chumash Tribal Monitor(s) shall have the authority to halt ground disturbing activities in the event previously unknown cultural resources are encountered or if known resources may be impacted in a previously unanticipated manner as a result of that ground disturbing activity.
- Details regarding the immediate cessation of ground disturbing activities within a minimum of 100 feet of the discovery of any cultural resources or human remains and measures to delineate the area with clearly visible lath, flagging tape, or other marking. The County and the appropriate consulting Tribes shall be consulted on a determination of significance.
- Notification procedures of unanticipated discoveries of cultural resources including human remains (see MM CUL-8 and MM CUL-9). The County and appropriate consulting Tribes shall be notified of a discovery as soon as possible but no later than 24 hours of the find. If the discovery occurs on a Friday, the County can be notified the following Monday morning.
- Specific in-field procedures for collecting, handling, and categorizing cultural resources, including human remains, encountered and a detailed process for evaluating unanticipated discoveries.
- Development of a preliminary treatment plan which shall, at a minimum, include:
  - A description of the treatment options for each type of resource which include, in order of priority: 1) preservation in place, where feasible; 2) the development of a treatment plan, archaeological testing, or data recovery; 3) reburial as close as possible to the location where all artifacts, remains, and/or funerary objects were found; and 4) reburial in a predetermined area. Any Chumash cultural materials disinterred as a result of this Project shall be curated or reinterred upon determination by the MLD after notification to the appropriate consulting Tribes. Reinternment shall be conducted on a weekly basis or as deemed appropriate by the MLD after notification to the appropriate consulting Tribes.
  - The location of a secured, on-site storage area for recovered artifacts and human remains shall be identified before any ground disturbing activities occur. The

location shall be determined in consultation with the appropriate consulting Tribes.

- In the event of a human remains discovery, the County and appropriate consulting Tribes shall be notified no later than 24 hours of the find along with one of the proposed treatment options outlined above, by the MLD, in consultation with the Applicant. The County and appropriate consulting Tribes shall be given 72 hours from the time of notification to provide comments on the proposed treatment option to the MLD.
- For the predetermined area for reburial of human remains and artifacts, the location must be surveyed in advance of its inclusion in the CRMDP, to determine if the location may be used (i.e., there are no biological and/or cultural/tribal resources sensitivities). In addition, the location must be limited to the reburial of human remains and artifacts from the Diablo Canyon Power Plant site. Lastly, the location must be under a deed restriction, protecting any reburials of human remains and artifacts in perpetuity.
- A commitment from the Applicant to pay all treatment costs for artifacts, funerary objects, and remains discovered, from discovery to reinternment, and for related documentation produced, if any, during cultural resources investigations conducted for the Project.
- Procedures for the Project Archaeologist, the Applicant, or its contractors to provide immediate notification to the County of San Luis Obispo Planning and Building Department and the appropriate consulting Tribes and immediately cease any earthwork conducted outside the limits of the approved grading plan or land use permit as these activities require prior approval by the County.
- Outline of reporting procedures, including monthly summary reports and an annual archaeological monitoring report to be submitted by the Project Archaeologist to the County of San Luis Obispo Planning and Building Department and appropriate consulting Tribes for review throughout the duration of Project disturbance activities. The County shall provide copies of the plan to the appropriate consulting Tribes for review. Formal technical reports are required for any archaeological testing or data recovery conducted. Annual archaeological monitoring reports and any technical testing or data recovery reports shall be submitted to the County and Central Coast Information Center. Upon completion of all monitoring or treatment activities at Project completion, the Project Archaeologist shall submit a final report under confidentiality to the County summarizing all monitoring/treatment activities. The County shall provide copies of the confidential final report to the appropriate consulting Tribes.
- PG&E or its designee(s) will consult with the County and appropriate consulting Tribes to develop measures for long term management of the resources including any routine operation and maintenance that may need to occur within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional Cultural Properties, and cultural land-

scapes, in accordance with state and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties).

**CUL-6 Cultural Resources Worker Environmental Awareness Program.** Prior to and for the duration of any ground disturbance, the Applicant or its designee shall provide Cultural Resources Worker Environmental Awareness Program (WEAP) training to all new workers prior to any new worker beginning work on the DCPP, PBR, and SMVR-SB sites.

The training program shall be developed by the Project Archaeologist with input from appropriate consulting Tribes and may be presented in the form of a video. A draft of the training program shall be provided to the County of San Luis Obispo Planning and Building Department for review and approval no fewer than 135 days prior to any ground disturbance at the DCPP, PBR, or SMVR-SB sites. A draft of the training program (i.e., video and written materials shall be provided by the County to the appropriate consulting Tribes for a 45-day review and comment period, prior to approval by the County. The training may be conducted concurrent with other environmental training (e.g., biological resources awareness training, safety training, etc.).

The training shall include, at a minimum:

- An overview by a tribal member from the appropriate consulting Tribes;
- A description of the types of Tribal Cultural Resources, archaeological, and cultural resources that may be encountered during decommissioning;
- Steps to follow in the event of an unanticipated discovery;
- Contact information for the County of San Luis Obispo Planning and Building Department, Project Archaeologist, Archaeological and Chumash Tribal Monitors and appropriate consulting Tribes;
- Samples or visual of artifacts that might be found on the site;
- Information that the Project Archaeologist, Archaeological Monitors, and Chumash Tribal Monitors shall have the authority to halt ground disturbing activities in the event previously unknown, or suspected cultural resources are encountered or if known resources may be impacted in a previously unanticipated manner as a result of that ground disturbing activity;
- Instructions that workers are to halt work on their own within 100-feet of a potential cultural resource discovery, shall contact their supervisor and the Project Archaeologist or Archaeological Monitor, and that redirection of work shall be determined by the Project Archaeologist and Chumash Tribal Monitors;
- Emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and discuss appropriate behaviors and responsive actions, consistent with Native American tribal values;

- An information brochure that identifies reporting procedures in the event of a discovery;
- An acknowledgement form signed by each worker indicating that the worker has received the training and will abide by the Project requirements; and
- A sticker that shall be placed on hard hats indicating that environmental training has been completed.

The Applicant or its designee shall provide, within a Project Monthly Compliance Report (see MM CUL-7), 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.

**CUL-7 Archaeological and Tribal Monitoring.** During and throughout all decommissioning activities, Archaeological Monitors and Chumash Tribal Monitors shall conduct full-time on-site monitoring during all ground disturbing activities, including those occurring in previously disturbed soil, soil sampling associated with the soil characterization study, and Final Status Surveys. Additionally, any decommissioning activity that occurs within the boundary of a known archaeological site shall be monitored by an Archaeological Monitor(s) and Chumash Tribal Monitor(s). Monitoring may not be required during hydroseeding or paving activities, unless an exception is demonstrated as warranted by the Project Archaeologist and approved by the County of San Luis Obispo Planning and Building Department, after consultation with the appropriate consulting Tribes.

Where multiple areas of work are concurrently permitted for grading or disturbance, or where multiple pieces of equipment are operating within the same work area, there shall be multiple monitors, at least one for each area, and a sufficient number of Archaeological Monitors and Chumash Tribal Monitors shall be onsite to ensure all concurrent decommissioning activities are monitored. The Chumash Tribal Monitors may be rotated to ensure that all appropriate consulting Tribes can observe the areas of work. The Project Archaeologist shall be responsible for creating monitoring schedules for the Archaeological Monitors and Chumash Tribal Monitors, and specifying the locations where they will monitor.

The Archaeological Monitors shall work under the direction of the Project Archaeologist and shall submit daily logs detailing the types of decommissioning activities, soils observed, and any discoveries to the Project Archaeologist. The daily log shall also identify the nature of any resource found and the method of mitigation treatment. The Project Archaeologist shall prepare a weekly summary report, with all daily monitoring logs appended, on the progress or status of cultural resources related activities which shall be provided to the appropriate consulting Tribes on a weekly basis. The weekly summary reports shall be provided to the County of San Luis Obispo Planning and Building Department in the Project Monthly Compliance Report.

Cultural resources monitoring activities are the responsibility of the Project Archaeologist. Any interference with monitoring activities, removal of a monitor from duties

assigned by the Project Archaeologist, or direction to a monitor to relocate or cease monitoring activities by anyone other than the Project Archaeologist shall be considered a non-compliance event. In the event a Chumash Tribal Monitor is dismissed from monitoring and the County of San Luis Obispo Planning and Building Department determines this to be in error, the Chumash Tribal Monitor will be compensated for time lost by the Applicant. Any disagreements between the Project Archaeologist and Chumash Tribal Monitors shall be brought to the County of San Luis Obispo Planning and Building Department's attention for resolution.

The Project Archaeologist or appropriate consulting Tribes shall notify the Applicant and the County of San Luis Obispo Planning and Building Department by telephone or email, of any incidents of non-compliance with any cultural resource mitigation measure or condition within 24 hours of becoming aware of the situation. The Project Archaeologist and appropriate consulting Tribes shall also recommend corrective action(s) to resolve the problem or achieve compliance with the mitigation measure or project condition.

In the event of a non-compliance issue, the Project Archaeologist shall write a report within two weeks after resolution of the issue that describes the issue, resolution of the issue, and the effectiveness of resolution measures. The report shall be provided in the next Monthly Compliance Report, which is submitted to the County. The Applicant or its designee shall also provide a copy of the non-compliance report to the consulting Tribe when issued to the County.

**CUL-8 Unanticipated Discoveries.** In the event that inadvertent/unanticipated Tribal Cultural Resources, archaeological, or cultural resources are exposed during decommissioning, all ground disturbing activity occurring within a minimum of 100 feet of the find shall immediately stop until the Project Archaeologist, Archaeological Monitor, and Chumash Tribal Monitor(s) can evaluate the significance of the find and determine, in consultation with the County of San Luis Obispo Planning and Building Department, whether additional study is warranted, including any efforts necessary to delineate the resource boundary.

The area of the discovery shall be delineated with clearly visible lath, flagging tape, or other marking and the County of San Luis Obispo Planning and Building Department notified within 24 hours of a discovery. If the discovery occurs on a Friday, the County can be notified the following Monday morning.

Depending upon the significance of the find, the Project Archaeologist or Archaeological Monitor and Chumash Tribal Monitor may record the find and allow work to continue. The County of San Luis Obispo Planning and Building Department shall be consulted on a determination of significance. If the discovery proves significant under the California Environmental Quality Act (CEQA), every effort will be made to preserve the resource in place, if possible. If avoidance/preservation in place is not feasible, specific resource documentation or recovery shall be implemented in accordance with the treatment options in the CRMDP (see MM CUL-5), including, but not limited to, the preparation of a treatment plan, archaeological testing, or data recovery.



During the assessment and potential treatment time, construction work may proceed in other areas outside the minimum 100-foot buffer consistent with MM CUL-5. Work at the discovery location cannot resume until all necessary investigation and evaluation under CEQA, Tribal consultation, and/or the procedures under PRC Section 5097.98 and Health and Safety Code Section 7050.5 have been satisfied and released by the County of San Luis Obispo Planning and Building Department.

**CUL-9 Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources.** Any decommissioning activities affecting previously known cultural and/or tribal resources, with the exception of soil sampling associated with the Site Characterization Study and Final Status Surveys, may not impact native soils.

In areas where cultural and/or Tribal Cultural Resources have previously been identified, heavy-duty equipment protection mats must be used where vehicles and/or heavy equipment is necessary for removal of any aboveground power plant infrastructure on non-paved areas.

The Applicant or its designee shall consult with the County Department of Planning and Building prior to conducting any soil remediation activities which could affect native soils and provide the County with adequate information to determine compliance with CEQA Guidelines Sections 15162-15164 and PRC §21074. The County shall consult with the appropriate consulting Tribes prior to approving any soil remediation activities affecting previously known cultural and/or tribal resources.

**CUL-10 Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities.** Prior to the removal of the guard, guard tower, and gate located at the Diablo Canyon Road entrance off of Avila Beach Drive (estimated to occur in 2035 as part of Phase 2), the Applicant or its designee shall develop a plan that details how public access will be restricted to the DCPD site once the guard, guard house, and gate are removed. Signs and gated barriers shall remain in place at Diablo Canyon Road, and Montaña de Oro State Park along North Ranch Road/Pecho Valley Road to cover the two potential access points to the DCPD site.

The intent of this plan is to reduce the potential for indirect impacts to cultural resources from increased and unrestricted public access. Other methods (e.g., signage, additional checkpoints or barriers) shall also be identified to inform and notify unintended visitors that the DCPD site is still not open to the public once the guard, guard house, and gate are removed. A draft of the plan shall be provided to the County for review and comment. This plan shall also be provided by the County to the appropriate consulting Tribes for a 45-day review and comment period prior to approval by the County.

At a minimum, the plan shall include the following:

- A description of what type of restriction(s) will be used (e.g., road barricades, no trespassing signs, temporary security guards, etc.) and a figure showing where public access restrictions will be established on the DCPD site.

- Road barriers at property boundaries to restrict and monitor uninvited access to the DCPP site.
- Signage at the intersection of Avila Beach Drive and Diablo Canyon Road that informs the public of limited access along Diablo Canyon Road to deter use of this road to access the DCPP site.
- A description of how and what restrictions will be used to monitor and restrict access to the DCPP site during weekends or when limited remaining decommissioning activities are taking place.

**CUL-11 Restrict Access to Environmentally Sensitive Areas for Marina Operations.** Prior to applying for construction or building permits to conduct any Marina improvements, the Third-Party Marina Improvements Applicant(s) or its designee(s) shall establish a plan that (1) cites all known culturally and/or archaeologically sensitive site locations at the DCPP site as Environmentally Sensitive Areas (ESAs), and (2) requires access to these areas to be restricted. Access shall be limited through the use of visible signage, wildlife friendly fencing (i.e., allows for the continued access and/or passage by wildlife), and natural barriers (e.g., boulders or native plants that can be used to block off areas and deter access), which should blend in with the existing sites and/or future Marina use at the DCPP site. The Third-Party Marina Improvements Applicant(s) shall provide the County a plan for review and approval prior to implementation and with documentation of the establishment of the ESAs, signage, fencing, and barriers. The plan will be provided by the County to the appropriate consulting Tribes for a 45-day review and comment period, prior to approval by the County.

Additionally, the Third-Party Marina Improvements Applicant(s) or its designee(s) will consult with the County and appropriate consulting Tribes to develop measures for long term management of the resources including any routine operation and maintenance that may need to occur within culturally sensitive areas that retain resource integrity, including tribal cultural integrity, and including archaeological material, Traditional Cultural Properties, and cultural landscapes, in accordance with state and federal guidance including National Register Bulletin 30 (Guidelines for Evaluating and Documenting Rural Historic Landscapes), Bulletin 36 (Guidelines for Evaluating and Registering Archaeological Properties), and Bulletin 38 (Guidelines for Evaluating and Documenting Traditional Cultural Properties).

**Residual Impacts.** Given the archaeological sensitivity of the area, although Proposed Project impacts to historical resources during Phases 1 and 2 of the Proposed Project would be reduced through the above mitigation measures, no mitigation is available to avoid significantly impacting previously unidentified resources. Impacts for Phases 1 and 2 of the Proposed Project would remain significant and unavoidable (Class I).

**Impact CUL-2: Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5 (Class I: Significant and Unavoidable).**

**Phase 1**

The proposed activities for Phase 1 of decommissioning generally include the removal of utilities, demolition of existing buildings, removal of security fencing, removal of the road segment west of the security fence at the Discharge Structure, removal of the guard rails along the road segment, and demolition of the Discharge Structure. All activities are ground disturbing and require the use of conventional excavation machinery. The railyard activities would include refurbishment of 1,100 feet of an existing spur rail at the PBR. At the SMVR-SB site, the proposed decommissioning activities include refurbishment of existing rail spurs, use of steel road plates or installation of engineered fill, and installation of perimeter fencing. No ground disturbing activities that would impact native soils are proposed in either of the railyards.

***Archaeology***

Based on the information provided in Section 4.5.1.6, *Cultural Resources Findings Summary*, no known unique archaeological resources are present on the DCPD site, PBR, or SMVR-SB. Therefore, no known unique archaeological resources would be directly or indirectly impacted by the Proposed Project.

***Unanticipated Buried Resources***

Due to the sensitive nature of the DCPD site, the potential for encountering unanticipated buried resources is highly probable even in previously disturbed areas. In the event an unanticipated buried resource is encountered, and if the currently unidentified resource were determined to be a unique archaeological resource, the Proposed Project activities could result in a significant impact to the resource. PG&E would conduct environmental awareness training as part of the Proposed Project (AC CR-2, *Worker’s Environmental Awareness Training – Cultural and Paleontological Resources*); however, this training focuses more on paleontology. Therefore, implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), and MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*) would lessen the overall impact, however, not to a less than significant level. Therefore, impacts are considered significant and unavoidable (Class I).

**Phase 2**

Proposed Phase 2 of the Proposed Project is described as continued Discharge Structure removal and a final site restoration phase. Restoration activities include soil remediation, backfilling, grading, landscaping to restore the site to natural conditions within the DCPD site, as well as continued operations (use of the Security Building, and indoor Firing Range). Phase 2 also proposes to establish a Blufftop road segment at the end of DCPD decommissioning to connect Shore

Cliff Road with North Ranch Road/Pecho Valley Road. No Phase 2 activities are proposed within the railyards.

### ***Archaeology***

As stated above, no known unique archaeological resources are present on the DCPD site. Therefore, no known unique archaeological resources would be directly or indirectly impacted.

### ***Unanticipated Buried Resources***

As previously noted, due to the sensitive nature of the DCPD site, the potential for encountering unanticipated buried resources is highly probable even in previously disturbed areas. In the event an unanticipated buried resource is encountered, and if the currently unidentified resource were determined to be a unique archaeological resource, the Proposed Project activities could result in a significant impact to the resource. PG&E would conduct environmental awareness training as part of the Proposed Project (AC CR-2, *Worker's Environmental Awareness Training – Cultural and Paleontological Resources*); however, this training focuses more on paleontology. Therefore, implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*), and MM CUL-10 (*Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities*) would lessen the overall impact, however, not to a less than significant level. Therefore, impacts are considered significant and unavoidable.

### ***Post-Decommissioning Operations***

**New Facility Operations.** Following Phase 2, activities at the DCPD site associated with the Proposed Project include operation of the new GTCC Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. Project operations do not have the potential to directly impact unique archaeological resources as there is little to no ground disturbance associated with continued operations and no known unique archaeological resources have been identified on the DCPD site.

**Future Actions.** If the Marina is operated by a third party, public restrooms would be provided and supported by a septic and dispersal system that is appropriately sized for the Marina uses. PG&E's expectation is these wastewater systems would be located within existing developed areas of the DCPD site. Additionally, permitting and the use of the Marina by a third party could cause indirect impacts to unknown unique archaeological resources, since members of the public would be allowed to explore the area and could stumble upon unknown artifacts that could be considered unique archaeological resources. Removing unique archaeological resources from their original context could be considered a significant impact. Establishing Environmentally Sensitive Areas (ESAs) around sensitive areas and restricting public access through physical barriers and signage would limit the potential for the public to identify resources. Therefore, implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain*

*County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), MM CUL-10 (*Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities*), and MM CUL-11 (*Restrict Access to Environmentally Sensitive Areas During Marina Operations*) would reduce the impacts to less than significant (Class II).

**Mitigation Measures for Impact CUL-2.** See Impact CUL-1 for text of measures.

- CUL-1 Retain County-qualified Project Archaeologist**
- CUL-2 Retain County-qualified Project Archaeological Monitors**
- CUL-3 Retain Chumash Tribal Monitors**
- CUL-4 Retain a Project Osteologist**
- CUL-5 Develop a Cultural Resources Monitoring and Discovery Plan**
- CUL-6 Cultural Resources Worker Environmental Awareness Program**
- CUL-7 Archaeological and Tribal Monitoring**
- CUL-8 Unanticipated Discoveries**
- CUL-9 Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources**
- CUL-10 Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities**
- CUL-11 Restrict Access to Environmentally Sensitive Areas for Marina Operations**

**Residual Impacts.** Given the archaeological sensitivity of the area, although impacts to unique archaeological resources for Phases 1 and 2 of the Proposed Project would be reduced through the above mitigation measures, no mitigation is available to avoid significantly impacting previously unidentified resources. Impacts during Phases 1 and 2 of the Proposed Project would remain significant and unavoidable (Class I).

**Impact CUL-3: Disturb any human remains, including those interred outside of formal cemeteries (Class I: Significant and Unavoidable).**

### **Phase 1**

The proposed activities for Phase 1 of decommissioning generally include the removal of utilities, demolition of existing buildings, removal of security fencing, removal of the road segment west of the security fence at the Discharge Structure, removal of the guard rails along the road segment, and demolition of the Discharge Structure. As mentioned previously, CA-SLO-2 and CA-SLO-61 are located within the area of proposed decommissioning activities but outside of any identified cut and fill locations or the Discharge Structure removal area. All activities are ground

disturbing and require the use of conventional excavation machinery. The railyard activities would include refurbishment of 1,100 feet of an existing spur rail at the PBR. At SMVR-SB, the proposed decommissioning activities include refurbishment of existing rail spurs, use of steel road plates or installation of engineered fill, and installation of perimeter fencing. No ground disturbing activities that would impact native soils are proposed in any of the railyards.

### ***Archaeology***

#### **DCPP Project Site**

A review of recent technical reports prepared for the DCPD Decommissioning Project identified human remains on the DCPD project site (PG&E, 2020; PG&E, 2021). Human remains were recorded within both CA-SLO-2 and CA-SLO-61.

**CA-SLO-2.** Phase 1 decommissioning activities within CA-SLO-2 include removal of an existing 230 kV TSP and the two guy wire anchors for that pole. Footings for the TSP and guy wire anchors would be abandoned in place and no excavations would occur. Therefore, the proposed Phase 1 decommissioning activities would not directly or indirectly impact known human remains within CA-SLO-2.

**CA-SLO-61.** Phase 1 decommissioning activity within CA-SLO-61 include removal of an existing security fence surrounding the nuclear reactors. A portion of the existing security fence is within the boundary of CA-SLO-61, which is currently paved over. The security fence would be removed to grade, and the fence post footings removed by being pulled directly out of the ground without excavating around them, then backfilled with clean fill. Alternately, the fence footings within the site boundaries could be abandoned in place, with only the top 3 to 6 inches of the footing removed to allow for a consistent grade and eventual paving. Since these activities would not involve the excavation of soils, these proposed activities would not directly nor indirectly impact known human remains within CA-SLO-61.

#### **Railyards**

**Pismo Beach Railyard.** There are two previously recorded sites within the Pismo Beach Railyard boundary, CA-SLO-81 and CA-SLO-832, with CA-SLO-832 having documented human remains. Phase 1 would include rail refurbishment, which does not include ground disturbing activities. CA-SLO-832 is located far west of the proposed spur rail refurbishment, and therefore would not be directly or indirectly impacted by the proposed activities, nor would any human remains associated with CA-SLO-832 site be impacted.

**SMVR-SB.** No subsurface excavations are proposed at the SMVR-SB site. Additionally, no human remains, including those interred outside of formal cemeteries, were identified through a record search or archaeological survey. Therefore, the proposed Phase 1 activities would not directly or indirectly impact known human remains.

### ***Unanticipated Buried Resources***

Due to the sensitive nature of the DCPD site, the potential for encountering unanticipated buried resources, including human remains, is highly probable even in previously disturbed areas. In the

event unanticipated human remains are encountered, the Proposed Project activities could result in a significant impact to the resource. PG&E would conduct environmental awareness training as part of the Proposed Project (AC CR-2, *Worker's Environmental Awareness Training – Cultural and Paleontological Resources*); however, this training focuses more on paleontology. Therefore, Implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*), and MM CUL-12 (*Discovery of Human Remains*) would lessen the overall impact, however, not to less than significant. Therefore, impacts are considered significant and unavoidable (Class I).

## Phase 2

Restoration activities under Phase 2 includes continued removal of the Discharge Structure, soil remediation, backfilling, grading, landscaping to restore the DCPD site to natural conditions, as well as continued operations (use of the Security Building, indoor Firing Range, and use of the Marina by a third party). Phase 2 also proposes to establish a blufftop road at the end of DCPD decommissioning to connect Shore Cliff Road with North Ranch Road/Pecho Valley Road. No Phase 2 activities are proposed within the railyards.

## Archaeology

### DCPP Project Site

As described above, one historical resource with documented human remains (CA-SLO-2) is located within the area of proposed Phase 2 activities, but outside of the Discharge Structure removal area. Soil remediation of an approximately 2,060 square foot former sand blast area may occur within the boundaries of CA-SLO-2. PG&E would not know if this area needs remediation until after Unit 1 and Unit 2 cease operations, when they complete a soil characterization study. Due to immense grading and use of CA-SLO-2 as a laydown area for the construction of DCPD, the site is heavily disturbed. Assuming PG&E remediates the former sand blast area using traditional mechanical equipment, the superficial soil remediation of a heavily disturbed portion of the site would not likely disturb human remains. However, given the sensitivity of this site, it is possible that intact deposits or isolated human remains could exist under the former sand blast area, should the soil remediation extend into native soils, which could be damaged or destroyed, resulting in a potentially significant impact. Implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Develop and Implement a Cultural Resources Environmental Awareness Training*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*), and MM CUL-12 (*Discovery of Human Remains*) would lessen the overall impact, however, not to a less than significant level. Therefore, impacts are considered significant and unavoidable (Class I).

### ***Unanticipated Buried Resources***

Due to the sensitive nature of the DCPD site, the potential for encountering unanticipated buried resources is highly probable even in previously disturbed areas. In the event unanticipated human remains are encountered, the Proposed Project activities could result in a significant impact to the resource. PG&E would conduct environmental awareness training as part of the Proposed Project (AC CR-2, *Worker's Environmental Awareness Training – Cultural and Paleontological Resources*); however, this training focuses more on paleontology. PG&E has also outlined procedures to follow in the event of an unanticipated discovery of human remains as part of the Proposed Project (AC CR-1, *Discovery of Human Remains*); however, the proposed mitigation measure below includes additional information, such as the establishment of a buffer zone to reduce potential impacts. Therefore, implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), and MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*), MM CUL-10 (*Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities*) and MM CUL-12 (*Discovery of Human Remains*) would lessen the overall impact, however, not to a less than significant level. Therefore, impacts are considered significant and unavoidable (Class I).

### ***Post-Decommissioning Operations***

**New Facility Operations.** Following Phase 2, activities at the DCPD site associated with the Proposed Project include operation of the new GTCC Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. Project operations do not have the potential to directly or indirectly impact human remains as there is little to no ground disturbance associated with continued operations.

**Future Actions.** If the Marina is operated by a third party, public restrooms would be provided and supported by a septic and dispersal system that is appropriately sized for the Marina uses. PG&E's expectation is these wastewater systems would be located within existing developed areas of the DCPD site. Given the sensitivity of the DCPD site any ground disturbance could cause impacts to unknown buried resources including human remains. Therefore, implementation of MM CUL-1 (*Retain County-qualified Project Archaeologist*), MM CUL-2 (*Retain County-qualified Project Archaeological Monitors*), MM CUL-3 (*Retain Chumash Tribal Monitors*), MM CUL-4 (*Retain a Project Osteologist*), MM CUL-5 (*Develop a Cultural Resources Monitoring and Discovery Plan*), MM CUL-6 (*Cultural Resources Worker Environmental Awareness Program*), MM CUL-7 (*Archaeological and Tribal Monitoring*), MM CUL-8 (*Unanticipated Discoveries*), and MM CUL-9 (*Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources*), MM CUL-10 (*Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities*), MM CUL-11 (*Restrict Access to Environmentally Sensitive Areas During Marina Operations*), and MM CUL-12 (*Discovery of Human Remains*), would reduce the direct impacts to less than significant (Class II).



**Mitigation Measures for Impact CUL-3.** See Impact CUL-1 for text of measures.

- CUL-1      Retain County-qualified Project Archaeologist**
- CUL-2      Retain County-qualified Project Archaeological Monitors**
- CUL-3      Retain Chumash Tribal Monitors**
- CUL-4      Retain a Project Osteologist**
- CUL-5      Develop a Cultural Resources Monitoring and Discovery Plan**
- CUL-6      Cultural Resources Worker Environmental Awareness Program**
- CUL-7      Archaeological and Tribal Monitoring**
- CUL-8      Unanticipated Discoveries**
- CUL-9      Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources**
- CUL-10     Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities**
- CUL-11     Restrict Access to Environmentally Sensitive Areas for Marina Operations**
- CUL-12     Discovery of Human Remains.** In the event human remains are discovered during decommissioning all Project activity shall immediately cease with a minimum of 100 feet of the discovery site, and the area delineated with clearly visible lath, flagging tape, or other marking. The County and appropriate consulting Tribes must be notified within 24 hours of the find as outlined in the CRMDP (see MM CUL-5 above). The Applicant or its designee shall comply with Section 15064.5 (e) (1) of the State CEQA Guidelines, and the procedures described in Section 7050.5 of the California Health and Safety Code. The Project Archaeologist and Project Osteologist with a Chumash Tribal Monitor shall inspect the remains and confirm that they are human, and if so, shall immediately notify the County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. Treatment, handling, and storage of remains will follow the protocols outlined in the CRMDP (see MM CUL-5 above).

If the coroner determines the remains are Native American, the coroner shall contact the Native American Heritage Commission (NAHC). As provided in PRC Section 5097.98, the NAHC will notify the person or persons it believes to be the Most Likely Descendent (MLD) from the deceased Native American. The MLD must follow the procedures and preliminary treatment options in the CRMDP and make a recommendation to the County and appropriate consulting Tribes for means of treating, with appropriate dignity, the human remains, and any associated grave goods as provided in PRC Section 5097.98 and as outlined in MM CUL-5 above. If more than one MLD is designated for the Project by the NAHC, each MLD shall be consulted regarding the handling of the human remains, and any associated grave goods and/or burial related soils. Burial associated grave goods and soil shall be reinterred with the associated burial.

Only the Project Archaeologist, Archaeological Monitors, Chumash Tribal Monitors, the County Coroner, and PG&E construction managers shall be permitted within 100 feet of the discovery site. Additional personnel may be allowed, as determined by the Project Archaeologist, the Chumash Tribal Monitors, and appropriate consulting Tribes. No photos should occur outside of immediate use (those taken by the Project Archaeologist and sent to the Project Osteologist) in determining if the remains are human and potentially Native American.

**Residual Impacts.** Given the archaeological sensitivity of the area, although impacts to human remains at the DCPP site for Phases 1 and 2 of the Proposed Project would be reduced through the above mitigation measures, no mitigation is available to avoid significantly impacting previously unidentified resources. Impacts for Phases 1 and 2 of the Proposed Project would remain significant and unavoidable (Class I).

### 4.5.5 Cumulative Impact Analysis

#### Geographic Extent Context

For the purposes of this cumulative impact analysis, Table 3-1 includes three 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 archaeological resources (i.e., ground disturbance) to combine with those of the Proposed Project:

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

The Orano System ISFSI Modifications (#1) is within the DCPP site; however, this project does not involve any ground disturbing activities.

This geographic scope of analysis is appropriate because the archaeological resources within this area are expected to be similar to those that occur on the Proposed Project site. Their proximity and similarity in environments would result in similar land-use, and thus, site types. Cumulative impacts could occur if other projects, in conjunction with the Proposed Project, would have impacts on cultural resources that, when considered together, would be significant.

The geographic scope for cumulative effects on built environment resources would include all the cumulative projects listed in Table 3-1 within the County of San Luis Obispo, County of Santa Barbara, and City of Pismo Beach, as follows:

#### ***Diablo Canyon Power Plant***

- Orano System ISFSI Modifications (#1)
- Communications Facility (#2)
- Avila Beach Drive at Highway 101 Interchange (#3)
- Flying Flags Campground (#4)
- Bob Jones Trail Construction (#5)
- Avila Beach Resort Phased Expansion Development Plan/Coastal Development Permit (#6)

### ***Pismo Beach Railyard***

- Signal at Bello and Price Canyon Road (#7)
- U.S. 101 Pismo Congestion Relief Project (#8)
- Public Safety Center (#9)
- Bello Road Paving (#10)
- Price Street Sidewalk Pavers (#11)
- Realign Frady Lane (#12)
- Storm Drain on Wadsworth from Bello to Judkins Middle School (#13)

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

- Highway 101 – Betteravia Road Interchange (#17)

### **Cumulative Impact Analysis**

#### ***Phase 1, Phase 2, and Post-Decommissioning Operations***

**Archaeology.** Impacts to cultural resources tend to be site specific and are assessed on a site-by-site basis. The Proposed Project would require implementation of MMs CUL-1 through CUL-12, which would lessen the overall impact; however, impacts are considered significant and unavoidable (Class I). As identified in Table 3-1, cumulative projects that are within the geographic extent for cultural resources include a Communications Facility (#2), which is currently on hold; the Flying Flags Campground (#4), which is under construction and partially open for use; and the Avila Beach Resort Phased Expansion Development Plan/Coastal Development Permit (#6) to construct hotel accommodations and related facilities, which is currently in the planning stages. These projects involve ground disturbing activity and therefore have the potential to impact cultural resources but may be completed prior to the Proposed Project's decommissioning activities.

Project-specific impacts would only contribute to a cumulative impact if the other cumulative projects impact significant cultural resources. Since the Proposed Project includes identified significant impacts related to cultural resources, it is anticipated that the cumulative effect in relation to cultural resources would remain significant and unavoidable. Because of the unknown nature of the cultural resources underlying the other cumulative projects and because of the nature of the Proposed Project's known impacts, it is expected that the cumulative impacts related to cultural resources will continue to be considered significant and unavoidable (Class I).

**Built Environment.** As no eligible historic resources are within the Project areas, the Proposed Project would not contribute any additional or cumulative impacts to eligible historic resources. The Proposed Project would not have cumulatively considerable impacts on historic built environment resources (No Impact).

### 4.5.6 Summary of Significance Findings

Table 4.5-3 presents a summary of the environmental impacts, significance determinations, and mitigation measures for the Proposed Project.

**Table 4.5-3. Summary of Impacts and Mitigation Measures – Cultural Resources Archaeology and Built Environment**

Impact Statement	Impact Significance Class				Mitigation Measures
	Phase 1		Phase 2		
	DCPP	PBR/SB	DCPP	Ops/Marina	
<b>CUL-1:</b> Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5	I	NI/NI	I	NI/II	<b>CUL-1:</b> Retain County-qualified Project Archaeologist <b>CUL-2:</b> Retain County-qualified Project Archaeological Monitors <b>CUL-3:</b> Retain Chumash Tribal Monitors <b>CUL-4:</b> Retain a Project Osteologist <b>CUL-5:</b> Develop a Cultural Resources Monitoring and Discovery Plan <b>CUL-6:</b> Cultural Resources Worker Environmental Awareness Program <b>CUL-7:</b> Archaeological and Tribal Monitoring <b>CUL-8:</b> Unanticipated Discoveries <b>CUL-9:</b> Decommissioning Activities Affecting Previously Known Cultural and/or Tribal Resources <b>CUL-10:</b> Plan to Restrict Public Access After Removal of Diablo Canyon Road Guard House Facilities <b>CUL-11:</b> Restrict Access to Environmentally Sensitive Areas for Marina Operations
<b>CUL-2:</b> Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5	I	NI/NI	I	NI/II	<b>CUL-1</b> through <b>CUL-11</b> (see above)
<b>CUL-3:</b> Disturb any human remains, including those interred outside of formal cemeteries	I	NI/NI	I	NI/II	<b>CUL-1</b> through <b>CUL-11</b> (see above) <b>CUL-12:</b> Discovery of Human Remains
Cumulative Impact	Cumulatively considerable		Cumulatively considerable		<b>CUL-1</b> through <b>CUL-12</b> (see above)

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.