4.17 Wildfire

This section describes environmental effects related to wildfire prevention and suppression caused by implementation of the Proposed Project. This section addresses existing environmental conditions in the Project area, existing laws and regulations applicable to wildfire prevention and suppression, and an analysis of Project impacts related to wildfire prevention and suppression. Additionally, this section recommends measures to avoid or reduce impacts from implementation of the Proposed Project.

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:

- Address impacts to Avila's one-way in and out access in terms of potential earthquake, fires, tsunamis, and nuclear facility events.

4.17.1 Environmental Setting

4.17.1.1 Wildland Fire

Project Location

The Proposed Project consists of the Diablo Canyon Power Plant (DCPP), the Pismo Beach Railyard (PBR) and Santa Maria Valley Railyard – Betteravia Industrial Park (SMVR-SB).

The DCPP property is located on the coast adjacent to the Pacific Ocean in San Luis Obispo County, approximately 7 miles northwest of the community of Avila Beach. With the exception of the industrial DCPP facility, the approximately 750-acre high-security zone surrounding the facility is relatively undeveloped and contains grasslands and dense oak woodlands. This high-security zone is defined by the Nuclear Regulatory Commission (NRC) nuclear power unit operating licenses and is within PG&E's approximately 12,000-acre owner-controlled area, which is comprised of largely undeveloped lands owned by PG&E or Eureka Energy.

The PBR site is in the City of Pismo Beach, and the SMVR-SB site is in unincorporated Santa Barbara County. Both rail sites are in more developed communities compared to the DCPP and are adjacent to residential development or actively farmed agricultural lands.

Climate and Topography

The DCPP site has a Mediterranean climate characterized by warm, dry summers and cool winters with most rainfall (based on the nearest community of Avila Beach) occurring between the months of November and April (Weather Atlas, 2021a). Coastal fog, also known as the marine layer, moderates coastal climate by reducing temperatures, raising humidity, and supplying moisture to the landscape (Langridge, 2018). The marine layer along the coast augments rainfall and provides moisture for plants and affects fuel moistures. Given the proximity of the DCPP to the Pacific Ocean, humidity levels average about 62 percent. The average temperature ranges from about 53 degrees Fahrenheit (°F) to about 70°F (Weather Atlas, 2021a).

The PBR and SMVR-SB sites are located approximately 0.75 and 9.7 miles inland from the Pacific Ocean, respectively. Similar to the DCPP site, the City of Pismo Beach experiences a mild coastal climate year-round. The area surrounding the City of Santa Maria experiences average temperatures ranging from around 55°F to 70°F and average humidity levels of about 62 percent. Precipitation is highest from October through April (Weather Atlas, 2021b).

Most of the infrastructure at the DCPP site is located on a relatively flat terrace. The reactors and primary system equipment for Units 1 and 2 are located on the main terrace at 85 feet above sea level. Other components such as the Independent Spent Fuel Storage Installation (ISFSI), 230- and 500-kilovolt (kV) switchyards, proposed firing range, and proposed GTCC Waste Storage Facility are located at slightly higher elevations on an upper terrace just northeast of Units 1 and 2. Extending from the DCPP site and to higher elevations are the 230 kV and 500 kV DCPP transmission lines. The DCPP facility is surrounded by gradual sloping hills that form the Irish Hills (see Figure 2- 8), which are a subrange of the Santa Lucia Range (Alterman et al., 1994). The Irish Hills are situated between the communities of Los Osos to the north and Avila Beach to the south (San Luis Obispo, 2019). They are characterized by relatively high relief (e.g., difference between the highest and lowest elevations) and crest elevations of 1,400 to 1,600 feet.

The PBR is primarily located on relatively level topography with elevations ranging from 30 to 100 feet above mean sea level within a narrow valley. Sloping hills surround the site immediately to the east and west. Some portions in the western area of the site along Price Canyon Road are steeper and drain eastward.

The SMVR-SB site is located on flat land within the Santa Maria Valley. No hills or mountains are located nearby.

Fire Factors

The four major factors that influence fire behavior in San Luis Obispo County are fuels, weather, topography, and human behavior. The area surrounding the DCPP includes chaparral, coastal scrub, and oak woodland habitats that are characterized by drought-tolerant and highly combustible plant species. Native shrub species that compose chaparral vegetation present a high hazard based on physiology (resin content), biological function, physical structure, and overall fuel loading (San Luis Obispo, 2019). These vegetation types are adapted to fire; in the absence of periodic, small fires, high fuel loads increase the risk for a large wildfire event. Woodlands also pose a wildfire risk that is exacerbated by the bark beetle epidemic, Sudden Oak Death, and other diseases. Weakened or dead trees are hazardous for wildfire ignition, as beetle infestations and diseases weaken their structures and increase the available amount of dry fuel (San Luis Obispo, 2019).

Fire danger rises and falls seasonally with changes in temperature, humidity, and fuel moisture (San Luis Obispo, 2019). During the summer months, coastal areas experience summer fog that increases moisture, reducing the flammability of fuel. However, the southern portion of the of San Luis Obispo County also occasionally experiences foehn winds (i.e., Santa Lucia Winds, a type of dry, warm, down-slope wind) along the west side of the coastal mountain range. Strong, onshore sea breezes are also common in the western portions of San Luis Obispo County during the summer months as marine air is drawn inland by thermal low pressure. The strong winds in

the DCPP area can exacerbate wildfire dangers because these winds can supply a fire with additional oxygen, provide even more dry potential fuel, and push the fire across the land at a faster rate.

The hilly topography and dense vegetation surrounding the DCPP facility establish conducive conditions for wildfire spread during the dry season. Topography describes the variability of elevation of the land and is commonly characterized by measurements of slope, elevation, and aspect (i.e., the direction that a slope faces). Slope is the steepness of the land, typically presented in units of percent or degrees. Steeper slopes tend to affect fire behavior, as fire moving uphill can preheat and dry out vegetation, accelerating the speed of fire movement. Elevation affects temperature, humidity, wind speed, and the growing season of vegetation. In lower elevations, fuels tend to dry out earlier in the year because of higher temperatures and lower precipitation levels compared to higher elevations (San Luis Obispo, 2019).

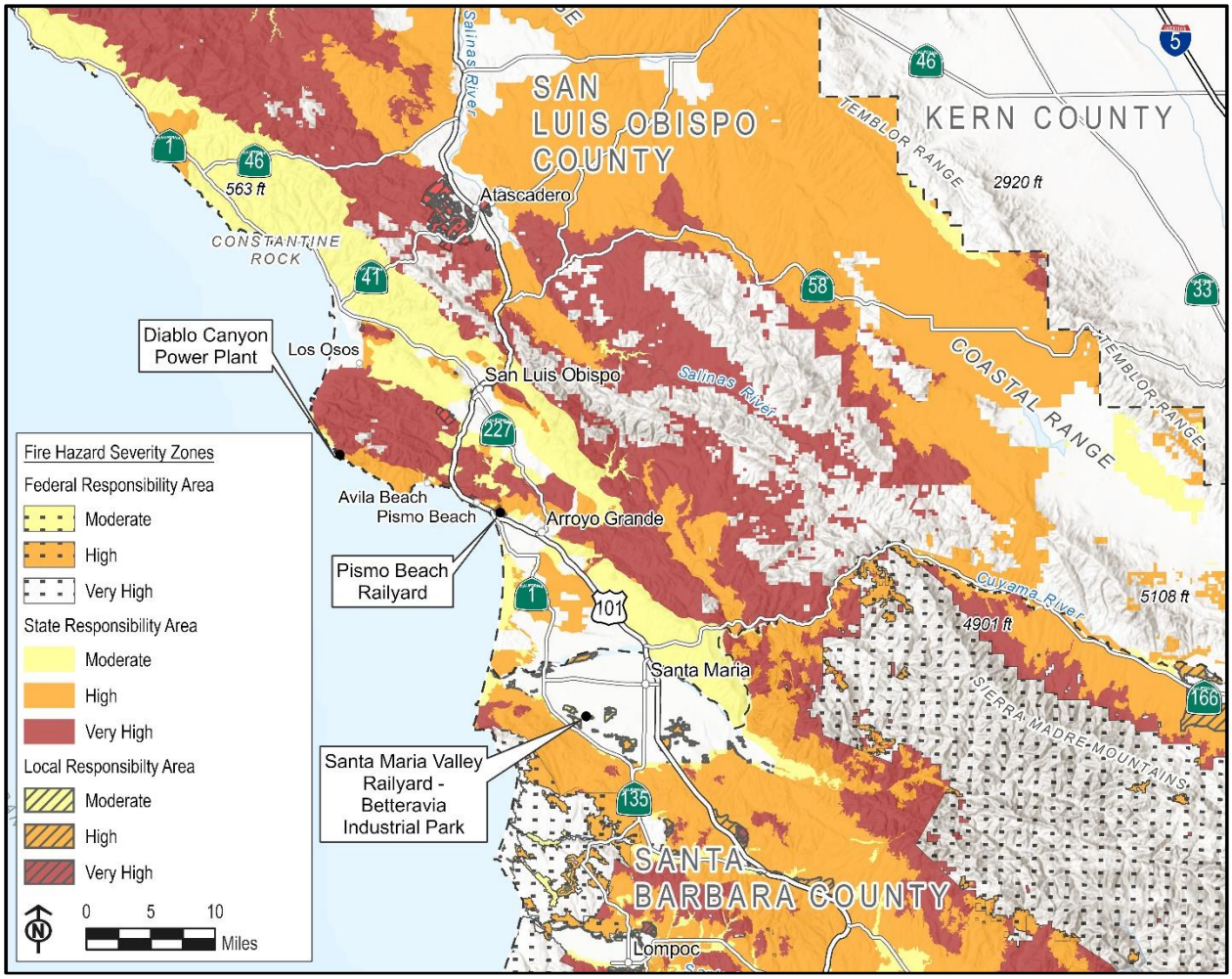
Aspect affects the amount of solar radiation (sunlight) absorbed by plants. Southern aspects typically receive maximum solar radiation, while northern aspects receive the least. Soil and plant moisture contents are the primary factor influenced by solar radiation. Vegetation on south-facing slopes tend to be more drought tolerant than those adapted to northern aspects. In addition, south-facing slopes tend to have less vegetation and lighter fuel loads, particularly at lower elevations. However, vegetation in these areas tend to dry out sooner and more thoroughly during the fire season. Northern aspects are more shaded, thus delaying the drying of fuels during fire season, but because of their higher fuel loading, heavily vegetated north slopes can experience more severe wildfire.

Human activity is considered to be one of the main contributors to wildfire ignition. Based on historical fire data in the County, the primary causes of ignition include powerlines, vehicles, equipment use, arson, campfires, and debris burning (San Luis Obispo, 2019). Spatial analysis of ignition locations indicates a direct correlation between ignitions and transportation corridors, with almost half of known ignition points being located within 20 feet of roads. A high density of ignitions also occurs within or adjacent to urban areas, with notable concentrations near the communities of Cambria, Lake Nacimiento, Paso Robles, Templeton, Atascadero, Los Osos, San Luis Obispo, Arroyo Grande, and Nipomo (San Luis Obispo, 2019). The concentration of ignitions near human development points to human activities as a substantial contributor to fires.

Fire Hazard Severity Zones

The California Department of Forestry and Fire Protection (CAL FIRE) manages the Fire Hazard Severity Zone (FHSZ) Viewer, which identifies areas of Moderate, High, and Very High FHSZs and local responsibility areas (LRAs), state responsibility areas (SRAs), and federal responsibility areas (FRAs). FHSZs are determined based on factors such as fuel availability, slope, fire history, vegetation, flame length, terrain, and weather. Figure 4.17-1 provides a high-level overall view of FHSZs in the County of San Luis Obispo and northern Santa Barbara County.

Figure 4.17-1. Fire Hazard Severity Zones

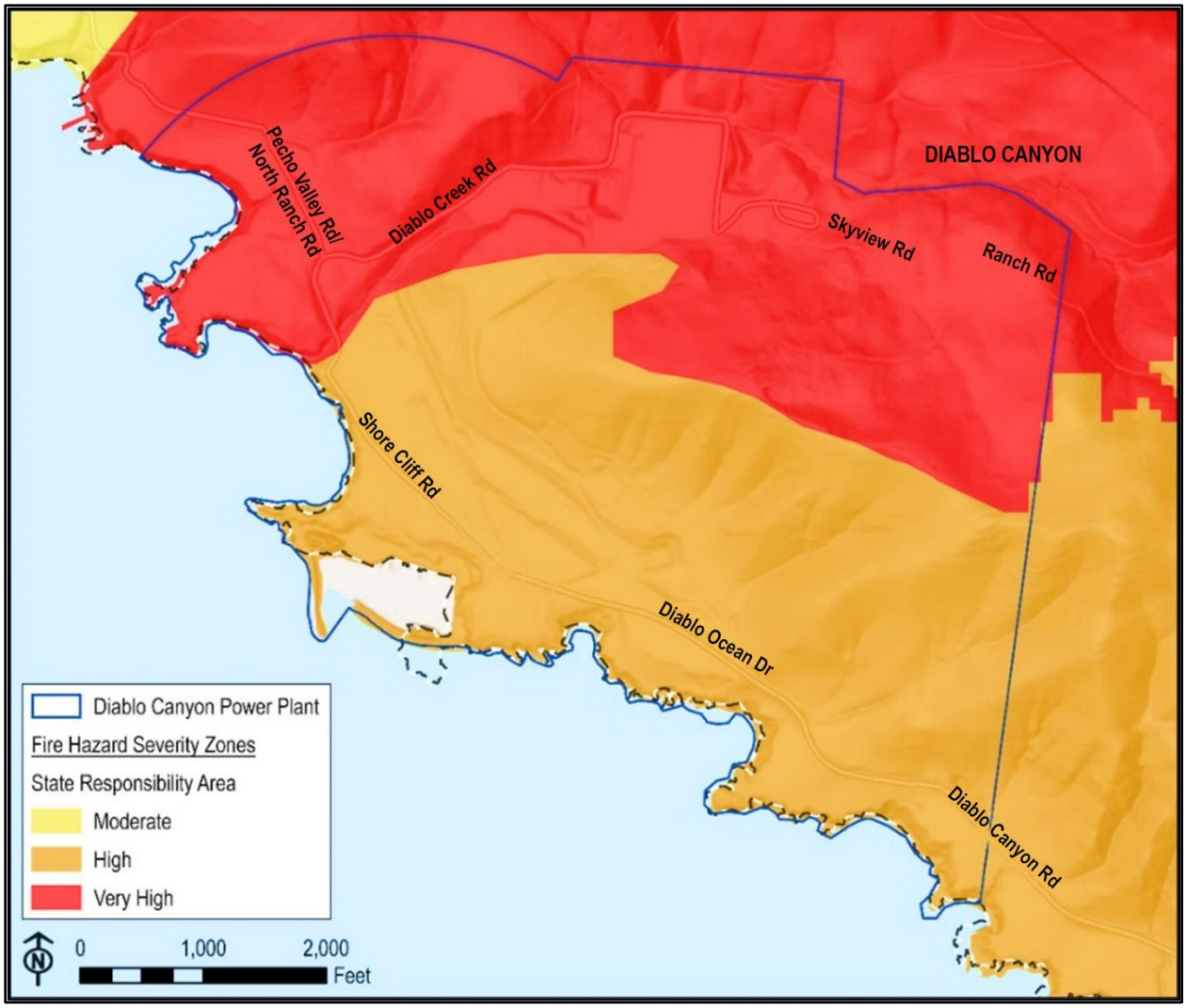


Source: PG&E, 2021a; CAL FIRE, 2007.

SRAs define areas where CAL FIRE is responsible for fire prevention and suppression. More than 31 million acres and approximately 1.7 million people are within SRAs (CAL FIRE, 2022a). The southern half of the DCPP is located within a High FHSZ, and the northern half is located within and surrounded by a Very High FHSZ within an SRA (see Figure 4.17-2).[46]

[46] On December 16, 2022, the State Fire Marshall provided notice to adopt proposed regulations pursuant to Public Resources Code (PRC) Sections 4202-4204, relating to the classifying of lands in the State Responsibility Area (SRA) into Fire Hazard Severity Zones (FHSZs). Under the proposed regulation, the entire DCPP site would be in the Very High FHSZ.

Figure 4.17-2. State Fire Hazard Severity Zones at DCPP



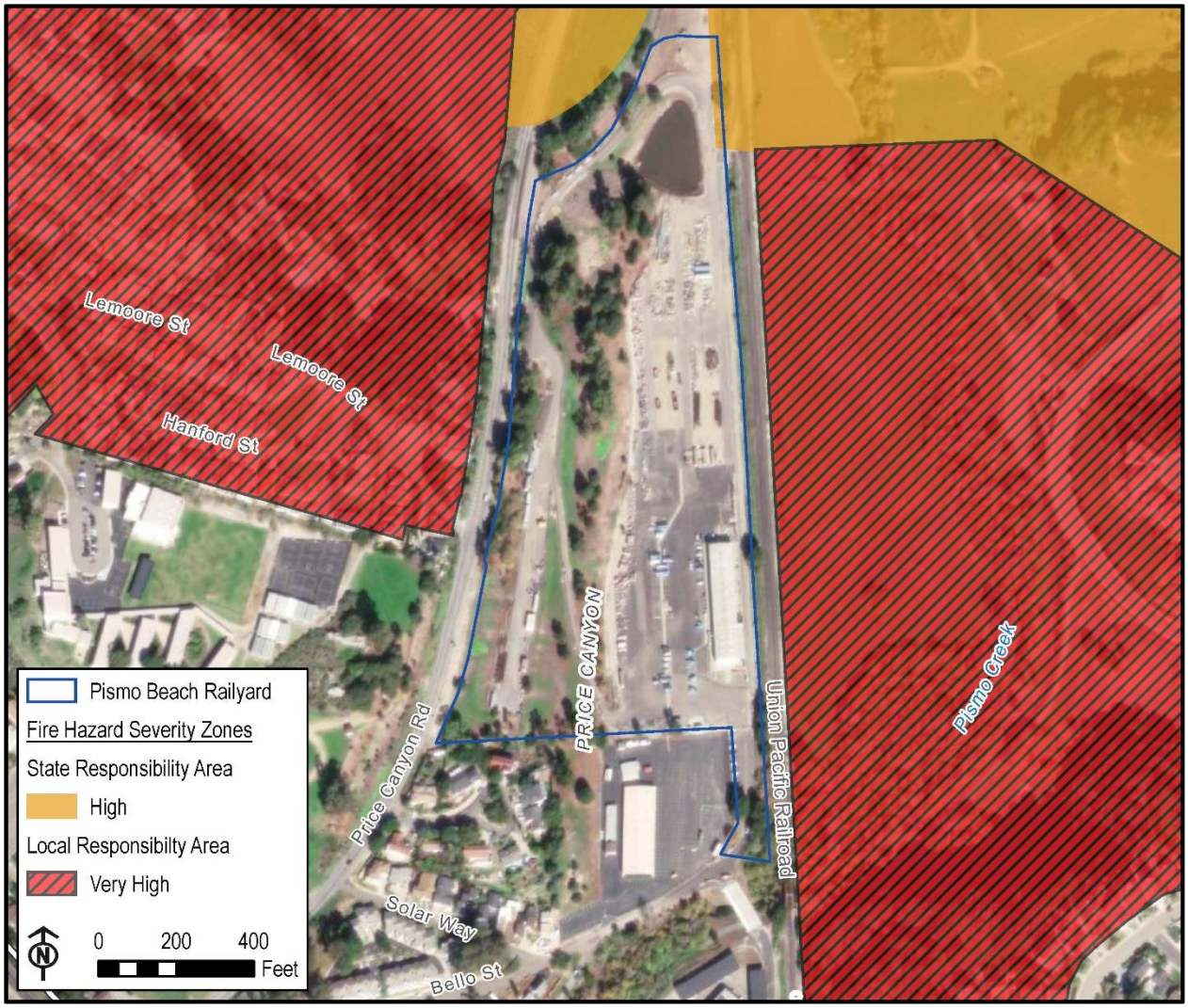
Source: PG&E, 2021a; CAL FIRE, 2007.

The nearest community of Avila Beach is within Moderate and High FHSZs, bordered by a Very High FHSZ to the north and east within an SRA. Although the PBR site is not located within Moderate, High, or Very High FHSZ, it is adjacent to Very High FHSZs within an LRA to the east and west (see Figure 4.17-3).

The SMVR-SB site is not within or adjacent to a Moderate, High, or Very High FHSZ (see Figure 4.17-1) (CAL FIRE, 2022b).

LRAs include incorporated cities, urban regions, agricultural lands, or portions of the desert where local government is responsible for wildfire protection. This is typically provided by city fire departments, fire protection districts, counties, and by CAL FIRE under contract. The PBR and SMVR-SB sites are within LRAs.

Figure 4.17-3. State and Local Fire Hazard Severity Zones at PBR



Source: PG&E, 2021a; CAL FIRE, 2007.

Fire History

Periodic wildland fires are a natural part of California's ecosystem and help maintain healthy fire-adapted landscapes. However, wildfires are predominantly caused by climate change and human activity and have increased in severity and frequency over time.

Table 4.17-1 shows the fire frequency in San Luis Obispo and Santa Barbara Counties from 2011 to 2021. In San Luis Obispo County, the average interval between large wildfires of more than 20,000 acres is approximately seven years, with intervals ranging from 1 to 17 years (San Luis Obispo, 2019). The annual acreage burned in 2016 and 2017 was over 30,000 acres, compared to an annual acreage of less than 5,000 acres during each of the previous five years (2011 through 2015). Additionally, the number of fires increased between 2017 and 2021 (65 fires) compared to 2011 and 2016 (29 fires). In Santa Barbara County, the annual acreage burned in 2016 and 2017 was over 170,000 acres, compared to an annual acreage of about 800 acres in the previous five years (2011 through 2015). The number of fires in Santa Barbara County increased between

2017 and 2021 (24 fires) compared to 2011 and 2016 (13 fires). Table 4.17-1 shows a breakdown by year of the number of fires over time and acreage burned in the two counties.

Table 4.17-1. Project Area Fire Summary

County	Year	Number of Fires	Acres Burned
San Luis Obispo County	2011	5	2,080
	2012	4	969
	2013	6	856
	2014	1	47
	2015	3	4,332
	2016	5	50,292
	2017	24	33,652
	2018	14	2,297
	2019	9	5,217
	2020	17	14,023
	2021	1	75
Santa Barbara County	2011	2	960
	2012	1	N/A
	2013	2	2,154
	2014	1	632
	2015	3	284
	2016	4	52,813
	2017	7	301,035
	2018	7	1,804
	2019	4	3,846
	2020	4	2,358
	2021	2	17,040

Source: CAL FIRE, 2021.

Many large wildfires have occurred in San Luis Obispo County, notably the Weferling (1960), Las Pilitas (1985), Chispa (1989), Highway 41 (1994), Highway 58 (1996), Logan (1997), and Chimney (2016) Fires. These fires burned approximately 400,000 acres, destroyed numerous structures, and cost millions of dollars for firefighting efforts. The most recent large fire, the Chimney Fire, destroyed 49 residences and 21 other structures.

An Urban Reserve Line (URL) indicates where urban development is permitted (within the line) and not permitted (outside the line). The Avila URL includes the following subregions:

- Avila Valley
- Cave Landing/Ontario Ridge
- Avila Beach
- San Luis Bay Estates
- Port San Luis

An estimated six wildfires burned under 50 acres within the Avila URL between 2015 and 2020. In June 2020, a wildfire near the Avila URL to the east of US-101 burned over 400 acres of land (San Luis Obispo, 2021).

Based on historical fire perimeter (i.e., outer edge or boundary of a fire) data in San Luis Obispo County, repeated burning primarily occurred in the Santa Lucia Range, federal lands, and chaparral habitat types. Areas with dense chaparral vegetation cover have experienced repeated burn patterns, larger fire perimeters, and repeated burns in the same areas compared to areas with grass-dominated lands in San Luis Obispo County (San Luis Obispo, 2019).

Santa Barbara County experienced 15 major fires within the last decade. The Gap, Tea, Jesusita, Sherpa, Whittier, Holiday, and Thomas Fires have directly threatened the heavily populated areas of Santa Barbara County. The Whittier, Holiday, and Thomas Fires destroyed multiple homes and forced the evacuation of thousands of residents in the communities of Goleta, Carpinteria, and Montecito (SBCFD, 2022a).

Fire Protection

The Diablo Canyon Fire Department (DCFD) consists of three crews with a minimum of five personnel each and provides primary fire protection services to the DCPP site. As described in Table 2-2, *Ongoing and Proposed Plans, Programs, and Reports*, the existing Operational Plan provides for the unified response between San Luis Obispo County Fire Department and the DCFD during a fire incident at DCPP (San Luis Obispo County Fire Department contracts with CAL FIRE to provide fire protection services, hereinafter referred to as "CAL FIRE/County Fire"). DCPP has a fire alarm system and existing site procedures covered by the Operational Plan for emergency fire response. PG&E has a memorandum of understanding with CAL FIRE/County Fire to provide backup fire protection service if the DCFD requires additional assistance. Fire protection services needs at DCFD would change once all spent nuclear fuel (SNF) has been moved to the Independent Spent Fuel Storage Installation (ISFSI) (i.e., expected by August 2029). PG&E proposes to amend the Operational Plan to specify the terms of the transition process for fire protection services. Additionally, according to Table 2-2, the Transition Plan would be implemented to provide for transitioning fire protection services from the DCFD to CAL FIRE/County Fire in a manner agreeable to both entities. Section 2.3.23, *Site Conditions at End of Phase 1,* describes the transition of fire protection services at the DCPP when all SNF has been moved to the ISFSI. Some DCFD personnel would remain on site for a period of time during the transfer of SNF to the ISFSI to provide fire protection support.

The closest CAL FIRE/County Fire station to the DCPP site is the Avila Valley Fire Station, located in Avila Valley at 1551 Sparrow Street (Avila Valley Fire Station 62), with an estimated 17-minute response time from the station to the power plant portion of the DCPP site (PG&E, 2021b). The Avila Valley Fire Station is staffed with two permanent personnel. The DCPP is accessed via the 7-mile primary access road (Diablo Canyon Road) that traverses from Port San Luis to the power plant (PG&E, 2021a).

Through cooperative agreements, CAL FIRE also provides fire protection services for the City of Pismo Beach and the Avila Beach Community Services District. Within the County of San Luis Obispo, CAL FIRE has six battalions with 23 fire stations, three of which are in the City of Pismo

Beach and Avila Beach (San Luis Obispo County Fire Department, 2022). The Santa Barbara County Fire Department has three battalions with 16 fire stations (SBCFD, 2022b).

PG&E Wildfire Safety Policy

PG&E manages the DCPP Wildfire Safety Policy, which establishes the Fire Potential Index Rating. This rating determines the risk of fire and its likely behavior. Its calculation and scale from "R1" to "R5-Plus" considers factors such as fuel moisture, humidity, wind speed, air temperature, and historical fire occurrence. These ratings are listed as follows (PG&E, 2021b – Attachment 3).

- R1: Very little or no fire danger.
- R2: Moderate fire danger.
- R3: Fire danger is so high care must be taken using fire-starting equipment. Local conditions may limit the use of machinery and equipment to certain hours of the day.
- R4: Fire danger is critical. Using equipment and open flames is limited to specific areas and times.
- R5: Fire danger is so critical that using some equipment and open flames are not allowed in certain areas.
- R5-Plus: The greatest level of fire danger where rapidly moving, catastrophic wildfires are possible. This is typically when fire danger is R5, "plus" there are high-risk weather triggers (e.g., strong winds).

The Wildfire Mitigation Matrix is a list of work activities, descriptions, and general risk reduction measures based on the Fire Potential Index Ratings for work within or near any forest, brush, or grass-covered lands (PG&E, 2021b – Attachment 3).

Landslides and Debris Flows

Wildfires contribute to loss of soil stability, leading to the possibility of landslides and/or debris flows. Once vegetative fuel and manmade structures are burned, root systems and foundations are weakened or completely destroyed. During heavy storms after a wildfire event, post-fire hillsides and slopes are especially susceptible to landslides and debris flows. Wildfire-induced landslides and debris flows may occur in areas adjacent to the Project sites, such as the hilly terrain surrounding the DCPP, the community of Avila Beach, and the PBR.

Evacuation Routes

Roads provide critical evacuation routes for people during a wildfire event. Diablo Canyon Road provides primary access for employees to and from the DCPP site. The paved two-lane, approximately 7-mile road runs from the main DCPP Access Gate off Avila Beach Drive near Port San Luis to the DCPP.

Avila Beach Drive provides access to the main DCPP Access Gate. Avila Beach Drive is considered a crucial evacuation route that connects San Luis Bay west into the community of Avila Beach, Cave Landing, Avila Point, and Port San Luis; no other secondary roads provide the same level of access that meet road standards. This constraint is further exacerbated during summer weekends

and holidays when traffic levels in the area may potentially impede evacuation. Traffic on Avila Beach Drive can exceed capacity during special events in the summer, when attendance can range from 1,000 to 5,000 people (San Luis Obispo, 2021).

PG&E's North Ranch Road/Pecho Valley Road serves as a fire department equipment access route to the DCPP from the north. It is also used as an alternative route for DCPP personnel if Diablo Canyon Road is out of service, and for ranching and land management activities for the North Ranch. The access route could also be used as an emergency evacuation route for Avila Beach and Port San Luis, if Avila Beach Drive and San Luis Bay Drive were compromised.

4.17.2 Regulatory Setting

The primary federal and state laws, regulations, and policies that are applicable to the Proposed Project are summarized in Appendix C. This section describes the relevant local laws, regulations, and policies for wildfire.

San Luis Obispo County General Plan, Safety Element. The San Luis Obispo County General Plan Safety Element outlines the County's applicable goals and policies regarding wildfire safety (San Luis Obispo, 1999).

Goal S-4: Reduce the threat to life, structures, and the environment caused by fire.

> Policy S-14. Ensure that adequate facilities, equipment, and personnel are available to meet the demands of fire fighting in San Luis Obispo County based on the level of service set forth in the fire agency's master plan.
>
> Policy S-15. The CAL FIRE/County Fire Department will maintain and improve its ability to respond and suppress fires throughout the County.

San Luis Obispo County Strategic Community Wildfire Protection Plan. The Community Wildfire Protection Plan was developed to collaboratively address fire protection planning efforts occurring in the County of San Luis Obispo, to minimize wildfire risk to County watershed lands, communities, assets, firefighters, and the public. It is developed to work cohesively with the California Fire Plan. The Community Wildfire Protection Plan provides a county-level strategic planning framework for wildfire hazard assessment and risk reduction within the County (San Luis Obispo, 2019).

SRA Fire Safe Regulations, 2020. These regulations constitute the basic wildfire protection standards of CAL FIRE within CAL FIRE/County Fire's jurisdiction within the SRA. The regulations are established to ensure that minimum wildfire protection standards, combined with building construction and development, are met (San Luis Obispo County Fire Department, 2020).

City of Pismo Beach General Plan, Safety Element. The City of Pismo Beach General Plan, Safety Element contains the following relevant policies related to wildfire and wildland fires (Pismo Beach, 2014).

Policy S-23: Evacuation Routes. Highways generally most suitable as evacuation routes are US-101, Highway 1, and Price Canyon Road. The particular route and direction of evacuation shall

be determined at the time of an emergency situation based upon an evaluation of conditions at that time by the county and city emergency operations centers.

County of San Luis Obispo, Avila Community Plan. The County of San Luis Obispo's public draft of the Avila Community Plan provides a planning framework that includes the following wildfire safety considerations (San Luis Obispo, 2021).

ER-8. Wildfire Hazards. Minimize the threat of wildfire hazards in the community of Avila.

> Program ER-8.1. Wildfire Hazards. Implement and manage strategies to prevent impacts of wildfire hazards.

CIR-8. Emergency Evacuation Access. Provide additional emergency evacuation routes.

> Program CIR-8.1. Emergency Evacuation Plan. Coordinate with the County Office of Emergency Services to prepare a community emergency evacuation plan for the Avila URL as an extension of the existing County Emergency Operations Plan.

Santa Barbara County Comprehensive Plan, Seismic Safety and Safety Element. The Santa Barbara County Comprehensive Plan, Seismic Safety and Safety Element provides the County's applicable goals and policies regarding wildfire hazards (Santa Barbara, 2015). As described in Section 1.3.3, *Federal*, railroads are under the jurisdiction of the federal government such that local agencies are preempted from exercising jurisdiction.

Goal 1: Protect the community from unreasonable risks associated with the effects of wildland and urban fires pursuant to Government Code 65302 (g)(1).

> Fire Policy 1. Continue to pursue and promote County fire prevention programs and control measures.
>
> Fire Policy 4. To reduce the potential for fire damage, the County shall continue to require consistency with County Fire Department Development Standards pursuant to the California Fire Code, Public Resource Code §4291, and Government Code §51175-51188.

Santa Barbara County Fire Department (SBCFD), 2022 Unit Strategic Fire Plan. The 2022 Unit Strategic Fire Plan was developed as a collaborative planning and assessment tool that provides pre- and post-fire management strategies to assess wildfire hazards and reduce associated risk. The Plan identifies goals and objectives that decrease wildland fire risk to County watersheds, communities, firefighters, the public, and other assets (SBCFD, 2022).

4.17.3 Significance Criteria

The significance criteria used to evaluate the Proposed Project's impact to Wildfire are based on Appendix G of the State CEQA Guidelines. A significant impact would occur if the Proposed Project would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan.
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

4.17.4 Environmental Impact Analysis and Mitigation

Impact WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

The Proposed Project would involve decommissioning activities at the DCPP site, requiring truck trips along Avila Beach Drive that could increase traffic congestion along this road and thereby affect Avila Beach's emergency response and limited evacuation capabilities. Avila Beach Drive is a crucial evacuation route that connects San Luis Bay west into the community of Avila Beach, Cave Landing, Avila Point, and Port San Luis.

During Phase 1 decommissioning activities, worker vehicles, trucks, heavy load trucks, and other equipment would access the DCPP site via Avila Beach Drive, the primary public road. These vehicles and equipment would periodically increase traffic congestion along Avila Beach Drive, particularly during special events occurring during the peak summer season when tourists increase traffic and parking demand in Avila Beach. Up to 79 (158 one-way) specialty transport vehicles or heavy-haul transport vehicle trips would be required to transport Large Component Class A Waste or RPV/RVI class A/B/C Irradiated metal to the SMVR site, Utah, or Texas for disposal. The vehicles, which generally have 12 axles, are 20 feet wide, and 200 feet long, may also require lane closures on certain roads due to their size (whether empty or loaded), which could obstruct or slow down emergency service access on affected roads, such as Avila Beach Drive. Although the California Highway Patrol would escort the vehicles during all movements in California, given the width of the specialty heavy-haul transport vehicles (20-feet) and the width of Avila Beach Drive (22-feet), the use of the specialty heavy-haul transport vehicles and accompanying lane and road closures would only be allowed to occur at night (10:00 p.m. – 5:00 a.m.), as required by Mitigation Measure (MM) TRA-2 (*Specialty Heavy-Haul Transport Vehicle Transportation Management Plan*).

To ensure emergency service providers can provide emergency services along the transportation route during specialty heavy-haul transport, MM TRA-2 requires that a Specialty Heavy-Haul Transport Vehicle Transportation Management Plan be prepared and implemented identifying the schedule, routes, coordination, notification, and monitoring for heavy-haul transport vehicles and associated road closures. MM TRA-2 would support coordination with emergency service providers by notifying them of peak construction activities and routes so that emergency response can be adapted to changing construction conditions as necessary. As such, impacts associated with these road closures would be reduced to less than significant (Class II).

The number of worker-related trucks traveling on Avila Beach Drive during decommissioning would be fewer than the daily number of employee vehicles that currently travel to the DCPP site. According to Section 2.2.3, *Existing Project Setting*, there are currently between approximately 1,157 and 1,400 workers on site during typical operating conditions. During Phase 1, the number of workers would decrease to approximately 870 and would continue to fluctuate but generally decrease as Phase 1 progresses. Therefore, the number of worker vehicles entering and exiting the DCPP site would decrease during Phase 1 compared to existing operating conditions. Overall, there would be a net decrease in vehicle trips to and from the DCPP site, which would reduce traffic congestion and associated impacts to Avila Beach Drive.

Trucking of waste from the DCPP site during Phase 1 and topsoil to the site during Phase 2 would occur during non-peak periods to avoid traffic-related impacts to Avila Beach, further reducing the impairment of Avila Beach Drive as an evacuation route. Specifically, MM TRA-1 (*Truck Transportation Outside of Peak Hours*) requires that truck transportation occur outside of peak traffic periods and includes the timeframes when decommissioning truck traffic is not allowed on Avila Beach Drive. Therefore, if an emergency evacuation occurs during peak hours, it would not be impaired by worker-related truck traffic, as MM TRA-1 would prevent truck transportation from occurring during peak hours.

Each truck entering DCPP would be subject to an approximately 30-second security screening process at the main security gate. The screening process would not be lengthy such that it would cause a long queue of trucks on Diablo Canyon Road/Diablo Ocean Drive or Avila Beach Drive (PG&E, 2022 – DR#8, Transportation 2).

Phase 1 involves demolishing most of the existing buildings at the DCPP. Although demolition activities may introduce a risk of fire due to causes such as sparks, hot exhaust pipes from vehicles, faulty wiring, or cigarettes, the DCPP facility has safety protocols in place that would continue to be followed throughout decommissioning activities, minimizing the likelihood of an emergency. Section 2.2.4, *Ongoing Safety and Environmental Activities*, identifies the Emergency Plan (Police Protection), Operational Plan, and the Transition Plan that may reduce the need for increased fire and police protection service by addressing safety protocols. Implementing the measures outlined in these plans would reduce the potential for accidents to occur, involve coordination and communication with emergency responders, address on-site emergency preparedness, address training and drills, and specify the terms of the transition process for fire protection services (see Table 2-2). To ensure that these proposed plans are revised, implemented and adhered to throughout the duration of the Project to reduce impacts to a less-than-significant level, MM PSU-1 (*Facility Plan Updating, Tracking, and Reporting*) is recommended. MM PSU-1 requires PG&E to identify the applicable plans, update them for decommissioning, record applicable specific recommendations during Project activities, and provide proof of implementation to the County. MM PSU-1 would require updating and tracking of items such as firefighting preplans, dispatch and notification, and communications that would support emergency response. Specifically, the Emergency Plan for Police Protection would be updated to address the modification to DCPP security once the SNF is transferred to the ISFSI and the GTCC waste is securely stored at the GTCC Waste Storage Facility. It would also identify the policing agencies' (i.e., CHP, County Sheriff) roles and responsibilities following decommissioning. The current Operational Plan agreement with CAL FIRE/County Fire, in particular, must be modified to address the Project-

specific decommissioning risks, such as security of the Project sites during decommissioning and radiation protection during removal and transport activities in accordance with NRC requirements. The Transition Plan would provide for transitioning fire protection services from the DCFD to CAL FIRE/County Fire in a manner agreeable to both entities such that the level of service of fire protection or paramedic services would be at a level appropriate for the site post-decommissioning. Recommendations of MM PSU-1 would meet the requirements of the National Fire Protection Association (NFPA) standards. Updating and implementing the plans and programs would help reduce the potential for accidents to occur while ensuring adequate availability of public safety services throughout decommissioning, and thus prevent increasing response times for fire or police protection.

Although nuclear reactor electrical generating activities would cease to occur following shutdown of the two reactors, and the number of on-site workers would be reduced, dismantling the DCFD facilities and on-site firefighting staff would result in an unacceptable response time for the nearest fire station (Avila Valley Fire Station 62) to respond to an incident at DCPP or surrounding recreational areas such as Montaña de Oro State Park. Closure of the DCFD would increase the burden of providing emergency services on Avila Valley Station 62. Avila Valley Station 62 has only one fire engine and an inadequate response time of 17 minutes to the DCPP site, which is more than CAL FIRE/County Fire's targeted response time of 15 minutes for the full range of service levels for rural areas (CAL FIRE/San Luis Obispo County Fire, 2012). The level of service would decline, as Avila Valley Station 62 would not adequately support both the DCPP site and the community of Avila Beach if multiple emergency events were to occur simultaneously (San Luis Obispo, 2022).

Therefore, MM PSU-2 (*Retain the Diablo Canyon Fire Department and Emergency Facilities*) is recommended to maintain an acceptable level of service at the DCPP site, surrounding area, and Avila Beach throughout the entire duration of the Proposed Project, and would reduce impacts affecting response times for fire to a less-than-significant level (Class II). MM PSU-2 would require the DCFD to be staffed in accordance with the NFPA staffing standards for an industrial construction site and to retain firefighting vehicles and equipment. MM PSU-2 would provide a continuous and acceptable level of service for the DCPP site and community of Avila Beach by retaining existing emergency response facilities and staffing to avoid inadequate response times.

Railyards

Pismo Beach Railyard. During Phase 1, if used, the PBR site would require minimal infrastructure modifications and would be used for the transport of non-radiological waste and non-hazardous waste from the DCPP to the PBR. Infrastructure modifications and waste transport to the PBR site would not require road or partial lane closures that could impair any evacuation routes. Trucks traveling to the PBR site would access the site via the Bello Street driveway and not from the existing Price Canyon Road driveway. The existing security gate is operated via a security key card that would be used to allow trucks into the site. The process time would be approximately 30 seconds or less such that there would be no expected queuing of trucks on Bello Street (PG&E, 2022 – DR#8, Transportation 4).

The shipment of non-radiological and non-hazardous waste would occur outside of peak traffic periods (7:00 a.m. to 9:00 a.m. and 3:00 p.m. to 6:00 p.m.) and avoid the morning and

afternoon drop-off and pick-up periods for students at Judkins Middle School as required by MM TRA-1 (*Truck Transportation Outside of Peak Hours*). In addition, truck idling would be limited to the extent feasible to substantially lessen obstructing emergency vehicle access along major routes in the City of Pismo Beach such as US-101 and Price Canyon Road. By avoiding the Price Canyon Road driveway, trucks would not back up or slow down traffic along Price Canyon Road, further avoiding impacts to emergency response along this evacuation route. In addition, only non-radiological and non-hazardous waste would be transported to the PBR site. Temporary storage of any non-radiological or non-hazardous waste at the PBR site would be kept at least one foot above any existing Federal Emergency Management Agency 100-year floodplain elevation (PG&E, 2021b – Hydro-2). This would reduce the need for emergency response during the transport and temporary storage of non-radiological wastes. Therefore, the impact would be less than significant with mitigation (Class II).

SMVR-SB. The SMVR-SB site is adjacent to industrial businesses, agricultural fields, and undeveloped private lands. The SMVR-SB site would require infrastructure modifications to support transport of Class A, B, and C radioactive waste and radiologically contaminated large components for out-of-state disposal. A maximum of 79 specialty heavy-haul transport vehicle trips may be required to transport waste to the SMVR site. Due to the large width of these trucks, waste transport to the SMVR-SB site may require lane closures on certain roads that could impair segments of evacuation routes.

As described in Section 2.3.19, *Decommissioning Waste Transportation and Disposal*, trucks traveling to the SMVR-SB site would utilize Betteravia Road. There are several surrounding roads that connect to US-101, the primary evacuation route, that motorists and emergency response vehicles can access. California Highway Patrol would escort the specialty heavy-haul transporter during all movements in California to ensure safe transport. Furthermore, shipments to the SMVR-SB site would occur outside of peak traffic times (between 7:00 a.m. and 9:00 a.m. and between 3:00 p.m. and 6:00 p.m.), as required by MM TRA-1 (*Truck Transportation Outside of Peak Hours*). In addition, MM TRA-2 (*Specialty Heavy-Haul Transport Vehicle Transportation Management Plan)* requires the preparation of a Traffic Management Plan to address road and lane closures associated with the use of specialty heavy-haul transport to ensure emergency vehicles can still access the area, and evacuations could still occur. With implementation of MMs TRA-1 and TRA-2, the temporary presence of trucks traveling to the SMVR-SB site outside of peak traffic times and trips associated with use of the specialty heavy-haul transport vehicle would not obstruct any evacuation routes or impair emergency access. MM TRA-2 would require the identification of parking restrictions, locations of no parking signage, and maintenance of a minimum 10-foot clear emergency travel lane adjacent to shoulders during road closures. Therefore, in the event of an emergency or evacuation, MM TRA-2 would ensure adequate lanes for emergency circulation. In addition, wastes would be packaged and transported in compliance with U.S. Department of Transportation regulations to prevent hazardous materials spills and reduce the need for emergency response during the transport of wastes. Therefore, the impact would be less than significant with mitigation (Class II).

Phase 2

The level of activity at the DCPP site during Phase 2 would decrease as decommissioning nears completion. Activities would include soil remediation, final status surveys, stormwater management, demolition of remaining utilities and facilities, construction of a blufftop road segment, and post-final site restoration monitoring. The number of workers would decrease to approximately 270 workers and would continue to decrease until the main plant site remediation is complete. As indicated in Table 27, *Waste Transportation Trips Per Period*, an estimated total of 122 direct truck waste transportation trips and approximately 1,760 truck trips for transport of topsoil would occur during Phase 2 over one year compared to an estimated 428 transportation trips via direct truck, truck, or rail during Phase 1. Although there would be a reduction in waste transportation trips during Phase 2, there would be an overall increase in truck trips with the addition of topsoil transport trips. This would increase the likelihood of vehicles obstructing evacuation routes or impairing emergency access along crucial emergency evacuation routes such as Avila Beach Drive. Additionally, although nuclear reactor electrical generating activities would cease to occur following shutdown of the two reactors, and activities during Phase 2 would have a lower potential to obstruct evacuation routes, dismantling the DCFD facilities and on-site firefighting staff would result in an unacceptable response time from the nearest fire station (Avila Valley Fire Station 62) to respond to an incident at DCPP or surrounding recreational areas such as Montaña de Oro State Park. The level of service would decline, as Avila Valley Station 62 would not adequately support both the DCPP site and the community of Avila Beach if multiple emergency events were to occur simultaneously (San Luis Obispo, 2022).

Therefore, MM PSU-2 (*Retain the Diablo Canyon Fire Department and Emergency Facilities*) is recommended to maintain an acceptable level of service at the DCPP site, surrounding area, and Avila Beach throughout the entire duration of the Proposed Project, and would reduce impacts affecting response times for fire protection. MM PSU-2 would provide a continuous and acceptable level of service for the DCPP site and community of Avila Beach by retaining existing emergency response facilities to avoid inadequate response times. In addition, MM TRA-1 (*Truck Transportation Outside of Peak Hours*) would require truck transportation to occur outside peak travel periods to reduce the potential for vehicles to obstruct evacuation routes or impede access by emergency vehicles. Furthermore, MM TRA-2 would require the identification of parking restrictions, locations of no parking signage, and maintenance of a minimum 10-foot clear emergency travel lane adjacent to shoulders during road closures. Therefore, in the event of an emergency or evacuation, MM TRA-2 would ensure adequate lanes for emergency circulation. Therefore, impacts would be reduced to less than significant (Class II).

Post-Decommissioning Operations

New Facility Operations. Following Phase 2, activities at the DCPP site associated with the Proposed Project would include operation of the new GTCC Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. The only staff needed on site would be those required to monitor and protect the ISFSI and GTCC Waste Storage Facility, which would be minimal (not disclosed due to security). Peak staff during ISFSI/GTCC quarterly, annual, and 5-year operations would be less than 50 (see Section 2.5.2, *Staffing Requirements*). These operations would not impair an adopted emergency response plan or evacuation plan, as they would not require road

closures or involve physical obstructions to evacuation routes such as Diablo Canyon Road/Diablo Ocean Drive. Additionally, establishing the blufftop road segment between Shore Cliff Road and North Ranch Road/Pecho Valley Road would enhance emergency access, allowing emergency vehicles to directly access the site from Avila Beach Drive to the south and Montaña de Oro State Park to the north. There would no longer be PG&E staff on site serving as DCFD; however, pursuant to MM PSU-2 (*Retain the Diablo Canyon Fire Department and Emergency Facilities*) CAL FIRE/County Fire would provide fire service to the property, post-decommissioning. The impact would, therefore, be less than significant with mitigation (Class II).

Future Actions. The Marina would be made available to a third party for permitting and reuse for recreational, education, or commercial purposes. Operations would include boating activities and operation of the ancillary structures, parking lots, and public restroom facility. These operations would not impair an adopted emergency response plan or evacuation plan, as they would not require road closures or involve physical obstructions to evacuation routes such as Diablo Canyon Road/Diablo Ocean Drive.

Per Title 14 of the California Code of Regulations, Division 1.5, Chapter 7 and 2019 California Fire Code D107, secondary egress in residential areas, a maximum of 250 people and 150 people is permitted in a High FHSZ and Very High FHSZ, respectively, before a formal secondary emergency access road is required (San Luis Obispo County Fire Department, 2020). Permitting and operations at the Marina, which is currently located within a High FHSZ, would be required to comply with these regulations. Additionally, the blufftop road segment constructed in Phase 2 would establish a connection between Shore Cliff Road and North Ranch Road/Pecho Valley Road, which would enhance emergency access, allowing emergency vehicles to directly access the site from Avila Beach Drive to the south and Montaña de Oro State Park to the north. The impact would be less than significant (Class III).

Mitigation Measures for Impact WF-1.

PSU-1 **Facility Plan Updating, Tracking, and Reporting.** See Section 4.14.

PSU-2 **Retain the Diablo Canyon Fire Department and Emergency Facilities.** See Section 4.14.

TRA-1 **Truck Transportation Outside of Peak Hours.** See Section 4.16.

TRA-2 **Specialty Heavy-Haul Transport Vehicle Transportation Management Plan.** See Section 4.16.

Impact WF-2: Exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose workers or residences to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire (Class II: Less Than Significant with Mitigation).

Phase 1

DCPP Project Site

Decommissioning, demolition, and trucking activity have the potential to increase the risk of wildfire as well as temporarily place people in a High FHSZ surrounded by Very High FHSZ. The

high fuel load, dry conditions during the fire season, varying topography surrounding the site, and influx of construction workers could expose workers and neighboring development to pollutant concentrations from a wildfire. Although the proposed Security Building, GTCC Waste Storage Facility, and Indoor Firing Range would be constructed within an existing paved area, construction would occur in close proximity to natural areas with oak trees abutting Diablo Creek. In addition, use of the SE Borrow Site would introduce truck transportation and heavy equipment necessary for soil excavation to an undeveloped area of the DCPP site. While nuclear reactor electrical generating activities would cease to occur following shutdown of the two reactors, and the number of workers on site would be reduced, there is a potential for construction activities involving hot work (e.g., welding) and equipment use to pose fire hazards in close proximity to vegetation during adverse high-wind weather conditions.

Implementing the wildfire safety measures such as those outlined in PG&E's Wildfire Mitigation Matrix as part of the DCPP Wildfire Safety Policy (see Table 2-2) would avoid construction hot work and other applicable activities during red flag conditions (PG&E, 2021b – Attachment 3). In addition, compliance with CAL FIRE's defensible space requirements for removal of dead or dying vegetation and debris (PRC Section 4291 and California Code of Regulations Title 14, Section 1299.03 – see Appendix C), and brush removal as required with every grading and construction permit and for improvements to the road leading to the SE Borrow Site, would reduce the potential for sparking vegetation fires. Implementation of MM BIO-3 (*Implement Oak and Native Mature Tree Protection Measures*) would ensure that oak trees are protected outside of work areas, and any required removal or trimming of oaks is adequately mitigated (see Section 4.3, *Biological Resources*). The on-site DCFD would also be available to respond to emergencies during decommissioning per MM PSU-2 (*Retain the Diablo Canyon Fire Department and Emergency Facilities*). Therefore, proposed activities would not exacerbate wildfire risks at the DCPP. In addition, although workers would be present at the DCPP site during Phase 1, there would be fewer people (approximately 870 workers) compared to existing operations (approximately 1,400 workers). Decommissioning activities would also follow the Decommissioning Operational Plan (see Impact PSU-1), which would address items including training and drills, firefighting pre-plans, dispatch and notification, safety, and support capabilities between the DCFD and CAL FIRE/County Fire.

Furthermore, PG&E maintains an existing Fire Protection Program for the DCPP in accordance with NRC regulations. This program would transition to the DCPP Decommissioning Fire Protection Program to meet the NRC requirements of 10 CFR 50.48(f) for decommissioning sites, which would address fire prevention, as well as detecting, controlling, and extinguishing fires, and substantially lessen the risk resulting from fires that could release radioactive materials.

The DCPP Decommissioning Fire Protection Program would continue to contain the following elements from the existing Fire Protection Program:

- Administrative controls
- Program organizational responsibilities
- Control of design basis analyses
- Configuration control
- Control of combustibles
- Fire system impairments

- Fire loss prevention standards
- State and local firefighting agency coordination and training
- Training to assure qualified individuals
- Procurement of Fire Protection Program equipment and services
- Conduct of audits, self-assessments, etc.

The DCPP Fire Protection Program also contains the Wildfire Safety Policy, which provides DCPP-specific guidance for preventing and reducing the risk of fires while performing work in the DCPP owner-controlled area. The Wildfire Safety Policy requires work to be evaluated against Utility Standard TD-1464S, *Preventing and Mitigating Fires While Performing PG&E Work*, which establishes requirements for PG&E personnel to follow when traveling to, performing work, or operating outdoors in any forest, brush, or grass-covered land. Fire safety requirements include the following (PG&E, 2021b – Attachments 2 and 3):

- Prohibiting driving through fields, forest, etc. except when performing required work or during an emergency.
- Requiring shovels, McLeod fire tools, or Pulaskis, fire extinguishers, and backpack pump or other water pump/delivery system.
- Ensuring vehicles are parked in areas clear of vegetation and all motors are turned off.
- Training workers on understanding PG&E's Utility Fire Potential Index and Wildfire Mitigation Matrix.
- Requiring a sealed toolbox containing the above-mentioned firefighting tools to be easily accessible at the work site.
- Observing all laws and regulations of local, state, and federal fire authorities with jurisdiction over the work area.
- Reporting all ignition events.
- Restricting smoking to areas away from vegetation.

All workers would be trained on understanding PG&E's Utility Fire Potential Index and Wildfire Mitigation Matrix, which outline allowable and restricted construction activities, tools, and machinery depending on the Fire Potential Index Rating. The types of construction activities and work equipment would generally be limited or completely restricted as the Fire Potential Index Rating increases (PG&E, 2021b – Attachments 2 and 3).

The reduction in workers and overall activity, guidance from the Decommissioning Operational Plan and Transition Plan, and compliance with the Fire Protection Program and Wildfire Safety Policy would reduce the risk of fire at the DCPP site and address fire prevention, safety, and suppression. With worker training and fire preparedness (i.e., keeping fire suppression tools and equipment on vehicles), an on-site fire can be controlled and suppressed. To ensure that these proposed plans and programs are implemented and adhered to throughout the duration of the Project, MM PSU-1 is recommended. MM PSU-1 would require PG&E to identify the applicable plans, update them to address decommissioning, record applicable specific recommendations during Project activities, and provide proof of implementation to the County. MM PSU-1 would require updating and tracking of items such as firefighting pre-plans, dispatch and notification, and communications that would support emergency response to reduce the likelihood of an uncontrolled spread of a wildfire. Specifically, the Emergency Plan for Police Protection would be updated to address the modification to DCPP security once the SNF is transferred to the ISFSI and

the GTCC waste is securely stored at the GTCC Waste Storage Facility. It would also identify the policing agencies' (i.e., CHP, County Sheriff) roles and responsibilities following decommissioning. The current Operational Plan agreement with CAL FIRE/County Fire, in particular, must be modified to address the Project-specific decommissioning risks, such as security of the Project sites during decommissioning. The Transition Plan would provide for transitioning fire protection services from the DCFD to CAL FIRE/County Fire in a manner agreeable to both entities such that the level of service of fire protection or paramedic services would be at a level appropriate for the site post-decommissioning and to adequately provide firefighting or fire suppression services as needed. Recommendations of MM PSU-1 would meet the requirements of the NFPA standards. Updating and implementing the plans and programs would help reduce the potential for accidents to occur while ensuring adequate availability of public safety services throughout decommissioning, and thus avoiding exacerbating wildfire risks. Therefore, the Proposed Project's potential to exacerbate wildfire risks due to slope, prevailing winds, and other factors, or expose workers or residences to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire would be substantially lessened. The impact would be less than significant with mitigation (Class II).

Railyards

Pismo Beach Railyard. The PBR site is located adjacent to Very High FHSZs to the east and west. Infrastructure modification at the PBR site would not increase the risk of wildfire at the site, as activities would be limited to replacing approximately 1,100 feet of track, wood railroad ties, and adding gravel. No new structures would be constructed that would house occupants. Proposed Project activities at the site, if used, would involve storing and shipping non-radiological and non-hazardous waste during Phase 1, which do not pose a risk of wildfire at the facility. Use of the PBR site would not exacerbate wildfire risks, as the facility is developed and paved, and would not expose workers or nearby residences to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, the impact would be less than significant (Class III).

SMVR-SB. The SMVR-SB site is not located within or adjacent to a Moderate, High, or Very High FHSZ (see Figure 4.17-1). Infrastructure modifications at the SMVR-SB site would require refurbishment of existing rail spurs, installation of Class 2 road base, and placement of temporary fencing, lighting, an office trailer, portable toilets, and portable power supply on site. During Phase 1 operations, trucks would transport waste to the SMVR-SB site. Equipment for loading material from trucks to railcars would include an electric gantry crane, truck-mounted cranes, scissor lifts, reach lifts, forklifts, and railcar mover. Refurbishment activities and operation of loading equipment would not increase the risk of wildfire at the site, as the facility is not located within or near a FHSZ and is developed and paved. Workers and nearby residences would not be exposed to pollutant concentrations from a wildfire. Therefore, the impact would be less than significant (Class III).

Phase 2

Phase 2 activities would result in a lower risk of fire at the DCPP site compared to Phase 1 activities, as the majority of structures and buildings would already be removed, new building construction would be completed, and the number of on-site workers would decrease to

approximately 270 and continue to decrease as Phase 2 progresses. Final site restoration activities during Phase 2 would involve essentially the same construction equipment used during Phase 1, but to a lesser extent. The overall intensity of activities at the DCPP site would be less than that of Phase 1, as remaining activities would be limited to soil remediation, final status surveys, demolition of utilities and parking areas, restoration, stormwater management, construction of a blufftop road segment, and restoration monitoring, as opposed to demolition of major buildings and hauling of waste.

Upon completion of Phase 2, the primary fire protection service provider at the DCPP would change from the DCFD to CAL FIRE/County Fire, as outlined in the Decommissioning Operational Plan and the Transition Plan (see MMs PSU-1 and PSU-2). Potential fire- and safety-related incidents that could occur during the transitional period would be identified and addressed in the Decommissioning Operational Plan. The Transition Plan would establish the terms for transitioning fire protection services from the DCFD to CAL FIRE/County Fire to ensure adequate firefighting capabilities post-decommissioning. These plans, combined with PG&E's Wildfire Mitigation Matrix, would substantially lessen the risk of fire during decommissioning activities. Phase 2 would implement MM PSU-1 to ensure that these plans are updated, implemented, and recorded for the County. As discussed under Phase 1, MM PSU-1 would require updating and tracking of items such as firefighting pre-plans, dispatch and notification, and communications that would support emergency response to reduce the likelihood of an uncontrolled spread of a wildfire. Updating the Emergency Plan for Police Protection, the Operational Plan, and the Transition Plan would help reduce the potential for accidents to occur while ensuring adequate availability of public safety services throughout decommissioning, and thus avoiding exacerbating wildfire risks. Phase 2 activities would not expose workers or nearby residences to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire. Therefore, the impact would be less than significant with mitigation (Class II).

Post-Decommissioning Operations

New Facility Operations. Following Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. The only staff needed on site would be those required to monitor and protect the ISFSI and GTCC Waste Storage Facility, which would be minimal (not disclosed due to security). Peak staff during ISFSI/GTCC quarterly, annual, and 5-year operations would be less than 50. Post-decommissioning operations would include maintaining defensible space around buildings and access roads in compliance with State and CAL FIRE defensible space requirements. Maintaining defensible space would slow the spread of a potential fire and enhance emergency access and evacuation. Operations and maintenance would not expose workers or residences to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The impact would be less than significant (Class III).

Future Actions. Marina operations could include boating activities and operation of the ancillary structures, parking lots, and public restroom facility. Although these operations would occur within a High FHSZ, they would not exacerbate wildfire risks, as activities would occur in paved areas and within the coastal area of the DCPP site. Boating activities would not pose a risk of wildfire. The impact would be less than significant (Class III).

Mitigation Measures for Impact WF-2. See Section 4.14 for full text of measures.

PSU-1 Facility Plan Updating, Tracking, and Reporting

PSU-2 Retain the Diablo Canyon Fire Department and Emergency Facilities

Impact WF-3: Exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) (Class II: Less Than Significant with Mitigation).

Phase 1

DCPP Project Site

The Proposed Project would remove and modify existing infrastructure and construct new buildings (i.e., new Security Building, GTCC Waste Storage Facility, and Indoor Firing Range) at the DCPP. PG&E has maintained Diablo Canyon Road/Diablo Ocean Drive since the DCPP site has been operational and would continue to maintain it to support decommissioning equipment and traffic. As part of decommissioning, the SE Borrow Site (Figure 2-30) would be used to provide fill material for restoration of the Firing Range. The combined area of disturbance within the Firing Range and SE Borrow Site is approximately 7.2 acres, and the total quantity of earthwork is approximately 198,000 cubic yards (see Section 2.3.16, *Grading and Fill*). The SE Borrow Site would be accessed utilizing the existing Skyview Road and Ranch Road that extend past the 500 kV Switchyard and Waste Storage Buildings to the east, then via an existing dirt road to the SE Borrow Site (PG&E, 2021b – PD-14). The existing road to the SE Borrow Site is 12 feet wide. It would be expanded to a width of approximately 20 feet by adding 4 feet of graded aggregate base/crusher to each side. The temporary width of disturbance would be 34 feet wide; however, no oak trees would be removed. In those areas where oak trees are located, the width of disturbance would be reduced as needed to avoid oak tree removal (see Section 4.3, *Biological Resources – Terrestrial* on reducing disturbance to oak trees*)*; traffic control would be implemented to allow for one-way traffic.

Road expansion and use of the SE Borrow Site and road maintenance activities for Diablo Canyon Road could spark a fire if vehicles or equipment idle along vegetated areas. Some of the anticipated equipment to be used for building and structure demolition, listed in Table 2-11, *Equipment Requirements for Phase 1*, have internal combustion engines that could spark a fire if there is an engine malfunction or if work is performed near combustible materials during high fire hazard conditions. The removal, modification, and installation of infrastructure would pose a fire risk and result in impacts to the environment. However, these risks would not be exacerbated by Project activities. Road maintenance and infrastructure removal activities would follow PG&E's Wildfire Safety Policy as discussed in Impact WF-2.

The Wildfire Safety Policy would prohibit vehicles from driving through combustible areas (i.e., fields or forests) except when performing necessary work or during an emergency. All work vehicles would be required to contain fire suppression equipment such as shovels, McLeod fire tools, or Pulaskis, fire extinguishers, and water delivery systems. Vehicles would be required to

park in areas clear of vegetation with all motors turned off. All workers would be trained on understanding PG&E's Utility Fire Potential Index and Wildfire Mitigation Matrix, which outline allowable and restricted construction activities, tools, and machinery depending on the Fire Potential Index Rating. The types of construction activities and work equipment would be limited or completely restricted as the Fire Potential Index Rating (i.e., fire hazard potential) increases. Implementation of MM PSU-1 (*Facility Plan Updating, Tracking, and Reporting*) would ensure that the Proposed Project adheres to the Wildfire Safety Policy under the DCPP Fire Protection Program.

Removal of the original power supplies from structures and components before demolition would reduce the risk of injury and fire danger. Cold and Dark Modification would deenergize the majority of the DCPP's electrical system and provide only the necessary power to support decommissioning activities. The existing 12 kV underground distribution system and re-purposing of the existing 230 kV switchyard would include metering, electrical protection, and the DCPP lockout/tagout process, which protects people and equipment during maintenance and testing (see Section 2.3.1, *Cold and Dark Modifications*). The reduction in the connection and use of power supplies would reduce the risk of accidents such as electrical fires.

Decommissioning, demolition, and trucking activities have the potential to increase the risk of wildfire. Although the reactors would no longer operate and would not pose a risk of overheating or fire, and the number of on-site workers would decrease from approximately 1,400 to 870, with the exception of the new Security Building, GTCC Waste Storage Facility, Indoor Firing Range, and Storage Buildings, no major permanent structures or other additional utility infrastructure would be installed that would exacerbate fire risk. Firearm training activities within the proposed Indoor Firing Range would occur exclusively within an indoor space, limiting the potential for combustible materials from being exposed to flammable vegetation at the DCPP. The GTCC Waste Storage Facility would be used to safely store radioactive materials, and no nuclear reactions would occur that would create a fire risk.

Areas requiring grading, site preparation for the facilities, as well as improvements to the SE Borrow Site access road would have vegetation removed consistent with CAL FIRE defensible space requirements, including removal of brush and dead or dying vegetation and debris, which would reduce the risk of igniting dry brush. Implementation of the Wildfire Safety Policy and compliance with its Wildfire Mitigation Matrix, along with MM PSU-1 (*Facility Plan Updating, Tracking, and Reporting*), would substantially lessen the risk of accidental wildfire ignition during removal, modification, and maintenance of infrastructure at the DCPP. Implementation of MM BIO-3 (*Implement Oak and Native Mature Tree Protection Measures*) would ensure that oak trees are protected outside of work areas, and any required removal or trimming of oaks is adequately mitigated (see Section 4.3, *Biological Resources*). The impact would be less than significant with mitigation (Class II).

Railyards

Pismo Beach Railyard. The PBR site is located adjacent to Very High FHSZs to the east and west. Infrastructure modifications at the PBR site would be limited to refurbishing existing rail track within the limits of the facility. No new roads, fuel breaks, emergency water sources, power lines, or other utilities would be required. Construction work would be minimal and

temporary and occur within a developed, paved facility. Transport of waste would occur on existing paved roads, and trucks would not park or idle in vegetated areas. Project activities at the PBR site would not exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure. The impact would be less than significant (Class III).

SMVR-SB. Infrastructure modifications at the SMVR-SB site would be limited to installation of a new approximately 900-foot-long rail spur and placement of temporary aboveground structures. The minor refurbishment of rail infrastructure and placement of temporary aboveground structures would not pose a substantial fire risk, as construction activities would occur within an existing developed facility that is not within or near a FHSZ (see Figure 4.17-1). No new roads, fuel breaks, emergency water sources, power lines, or other utilities would be required at the SMVR-SB site. Transport of waste would occur on existing paved roads, and trucks traveling to the site would not park or idle in vegetated areas. Project activities at the SMVR-SB site would not exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure. The impact would be less than significant (Class III).

Phase 2

By the time Phase 2 begins, Units 1 and 2 and buildings at the DCPP site would be demolished. New construction including the GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings would be completed. Remaining utilities, structures, and closed roads not required to support the long-term operation of the ISFSI or 230 kV/500 kV switchyards would continue to be demolished throughout Phase 2. In addition, completion of backfill activity at the Discharge Structure and removal of the cofferdam would occur in Phase 2. Infrastructure modifications such as long-term stormwater management would occur. This includes components installed through final restoration grading such as basins, revegetation, and bioswales, as well as construction of a new blufftop road segment.

Installation of these features would not pose a substantial risk of wildfire because activities would be less intensive than in Phase 1. Restoration and monitoring activities would not pose a risk of fire, as scarifying activities would occur on existing roads to be demolished and grading would occur over bare earth. PG&E's Wildfire Safety Policy would prohibit vehicles and equipment from driving through vegetated areas except for required work or an emergency. Vehicles would be required to park in areas clear of vegetation with all motors turned off. Firefighting equipment such as shovels, McLeod fire tools, Pulaskis, fire extinguishers, and water pump/delivery systems would be required on work vehicles to avoid the uncontrolled spread of an accidental fire. MM PSU- 1 (*Plan Updating, Tracking, and Reporting*) would ensure that these recommendations are implemented and adhered to during Phase 2. MM PSU-1 would require updating and tracking of items such as firefighting pre-plans, dispatch and notification, and communications that would support emergency response to avoid exacerbating fire risk during Phase 2 activities. The Transition Plan would provide for transitioning fire protection services from the DCFD to CAL FIRE/County Fire in a manner agreeable to both entities such that the level of service of fire protection or paramedic services would be at a level appropriate for the site post-decommissioning and to adequately provide firefighting or fire suppression services as needed. Recom-

mendations of MM PSU-1 would meet the requirements of the NFPA standards. Updating and implementing the plans and programs would help reduce the potential for accidents to occur while ensuring adequate availability of public safety services throughout decommissioning, and thus avoiding exacerbating wildfire risks. The number of workers and intensity of activities would continue to decrease as Phase 2 progresses, and no new infrastructure would be constructed or maintained. Phase 2 would not exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure. The impact would be less than significant with mitigation (Class II).

Post-Decommissioning Operations

New Facility Operations. Following Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. New facility operations would be limited to protection of the ISFSI and GTCC Waste Storage Facility. Infrastructure such as electrical utilities and access roads not needed during Phase 2 would no longer exist during new facility operations. Therefore, maintenance of such infrastructure would be reduced, and the risk of fire would decrease. Operations would not exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure. The impact would be less than significant (Class III).

Future Actions. Retained facilities available for use post-decommissioning would include the Marina, the Intake Structure, the Intake Structure's ancillary structures (e.g., Intake Access Facility, Divers Shower/Lab Facility, Intake Control Building, etc.), and boat dock. New infrastructure for future operation of the Marina (following County entitlement approval) could include parking lots, restrooms, a septic system, a boat hoist and access stairs. Operation of these components would not exacerbate fire risks or result in substantial environmental impacts because it would be limited to recreational, educational, or commercial boating or research activities. The Marina is also not expected to support a high-intensity use, as a maximum of 200 people per day is assumed to visit the Marina, and fewer people would deploy boats and other watercraft. The impact would be less than significant (Class III).

Mitigation Measures for Impact WF-3.

BIO-3 Implement Oak and Native Mature Tree Protection Measures. See Section 4.3.

PSU-1 Facility Plan Updating, Tracking, and Reporting. See Section 4.14.

Impact WF-4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes (Class II: Less than Significant with Mitigation).

Phase 1

DCPP Project Site

The DCPP site is located in an area that experiences natural periodic wildland fires. The DCPP site has a Mediterranean climate characterized by warm, dry summers, and is surrounded by vegeta-

tion including chaparral, coastal scrub, and oak trees that are highly combustible yet adapted to survive from and propagate as a result of fires. As discussed in Section 4.17.1, *Environmental Setting*, most of the infrastructure at the DCPP site is located on a relatively flat terrace, with some components located on an upper terrace northeast of Units 1 and 2. The DCPP site is surrounded by gradual sloping hills that form the Irish Hills, which are characterized by high-relief topography. Although the hilly topography and dense vegetation surrounding the DCPP site establish favorable conditions for wildfire during the dry season, the DCPP site is not located near other development. The nearest residential communities are in Avila Beach and Los Osos, approximately 7 miles southeast and approximately 8 miles north of the DCPP site, respectively. No other industrial or commercial development is located near the DCPP.

Phase 1 would include various decommissioning activities such as site modifications, building demolition, waste transportation, and grading activities that would modify site drainage characteristics. These activities may be a fire risk due to the presence of equipment, vehicles, and workers that may produce sparks or ignite nearby vegetation through hot exhaust pipes or smoking. Pursuant to MM PSU-2 (*Retain the Diablo Canyon Fire Department and Emergency Facilities*) the DCFD would continue to provide on-site firefighting services through Phase 2. Phase 1 activities would follow the Decommissioning Operational Plan as required by MM PSU-1 (*Facility Plan Updating, Tracking, and Reporting*), which addresses authorities, training and drills, firefighting pre-plans, the incident command system, dispatch and notification, safety, and support capabilities. Implementing the measures outlined in the Decommissioning Operational Plan would reduce the likelihood of an accidental fire causing post-fire slope instability that could injure on-site workers. MM PSU-1 would ensure that the existing Operational Plan is updated to address decommissioning and implemented and adhered to during Phases 1 and 2. Recommendations of MM PSU-1 would meet the requirements of the NFPA standards. Updating and implementing the plans and programs would help reduce the potential for accidents to occur while ensuring adequate availability of public safety services throughout decommissioning, and thus avoiding exacerbating risks related to post-fire flooding, landslides, slope instability, and drainage changes. Drainage changes due to grading and fill activities would not expose people or structures to risks, as the DCPP site is not located near other development. Furthermore, given the DCPP site's remote location and its structures being located on graded terraces, the Proposed Project would not expose people or structures to downstream flooding, landslides, or post-fire slope instability. Therefore, the impact would be less than significant with mitigation (Class II).

Railyards

Pismo Beach Railyard. The PBR site is primarily located on relatively level topography with elevations ranging from 30 to 100 feet above mean sea level within a narrow valley. Sloping hills surround the site immediately to the east and west, with steeper areas in the western portion of the site along Price Canyon Road. The facility is surrounded by open space and residences to the north, a Union Pacific Railroad line and open space to the east, a wastewater treatment plant and a church to the south, and residences and Judkins Middle School to the west (see Figure 2-3). Open space areas near the site consist of non-native grasslands, roadside ruderal areas, riparian areas, and coast live oak woodland.

Although the PBR site is located adjacent to Very High FHSZs to the east and west, Phase 1 activities would not exacerbate the risk of fire or cause downslope soil instability or downstream flooding. The Proposed Project would not introduce large structures at the PBR site that could contribute to post-fire slope instability. Construction activities would not increase the risk of fire because refurbishment would be limited to replacing approximately 1,100 feet of track, wood railroad ties, and adding gravel. Transporting waste to the PBR site would also not contribute to fire or post-fire landslides, as trucks would travel along developed and paved roads within the existing developed facility. Refurbishment and operation of the PBR site would not expose people or structures to downslope or downstream flooding or landslides, post-fire slope instability, or drainage changes. Therefore, the impact would be less than significant (Class III).

SMVR-SB. The SMVR-SB site is located on flat land with elevations ranging from approximately 152 to 174 feet above mean sea level and is adjacent to agricultural fields and ruderal lands. The flat topography and agricultural and ruderal vegetation surrounding the facility do not pose a high risk of wildfire. As such, Proposed Project activities at the SMVR-SB site would not expose people or structures to risks of downslope or downstream flooding or landslides, post-fire instability, or drainage changes. Therefore, no impact would occur.

Phase 2

By Phase 2, the majority of the buildings and structures at the DCPP site would be removed, new building construction would be completed, and the intensity of decommissioning activities would reduce. The remaining utilities, structures, roads, and parking area would be demolished, and final remediation, restoration, and monitoring activities would occur. As with Phase 1, Phase 2 would continue to implement MM PSU-1 (*Facility Plan Updating, Tracking, and Reporting*) to ensure that plans and programs are updated for decommissioning and recommendations are implemented, tracked, and verified. Infrastructure modifications such as long-term stormwater management would occur. This may include components such as basins, revegetation, and bioswales, as well as construction of a new blufftop road segment.

Construction of the blufftop road segment and final site contouring and restoration would not increase the risk of wildfire as they would occur near the coastal area of the DCPP site and are not located near sloped areas adjacent to inhabited development. Restoration activities would include regrading former building foundations and roads to a surface level close to existing natural contours. The restored topography would promote natural and unobstructed stormwater infiltration and drainage. The drainage changes would not expose people or structures to risks, as the DCPP site is not located near other development.

The nearest residential communities are in Avila Beach and Los Osos, approximately 7 miles southeast and approximately 8 miles north of the DCPP site, respectively. No additional large permanent structures would be constructed in Phase 2. Phase 2 activities would not increase the risk of wildfire at the DCPP site and would not expose people or structures to downstream flooding, landslides, or post-fire slope instability. Therefore, the impact would be less than significant with mitigation (Class II).

Post-Decommissioning Operations

New Facility Operations. Following Phase 2, activities at the DCPP site associated with the Proposed Project include operation of the new GTCC Waste Storage Facility, Security Building, indoor Firing Range, and Storage Buildings. Activities would be limited to monitoring and protecting the ISFSI and GTCC Waste Storage Facility, and the area would remain minimally developed. No additional buildings or regrading would occur during new facility operations that would expose people or structures to risks of post-fire slope instability or flooding. New facility operations would not expose people or structures to risks of downslope flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. The impact would be less than significant (Class III).

Future Actions. The Marina would be made available to a third party for permitting and reuse. The Marina, proposed parking lot, and public restroom facility would be located on a relatively flat terrace and would not be located near any other development. Operational activities would include boating for recreational, education, or commercial purposes, which would not cause slope instability or exacerbate wildfire risks, as the area would be paved and adjacent to the Pacific Ocean. Upslope site restoration would stabilize the recontoured surfaces and provide for surface drainage management with infiltration and native vegetation. Operation of the Marina area would not expose people or structures to risks of downslope flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes. The impact would be less than significant (Class III).

Mitigation Measures for Impact WF-4.

PSU-1 Facility Plan Updating, Tracking, and Reporting. See Section 4.14

4.17.5 Cumulative Impact Analysis

Geographic Extent Context

For the purposes of the cumulative impact analysis for wildfire hazards, Table 3-1 lists six 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 wildfire to combine with those of the Proposed Project. These applicable cumulative projects are 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)
- Avila Beach Resort Phased Expansion Development Plan/Coastal Development Permit (#6)

Pismo Beach Railyard

- U.S. 101 Pismo Congestion Relief Project (#8)

These six projects are likely to occur simultaneously with the Proposed Project and are located in or near High and Very High FHSZs. The cumulative projects located further away than these are

not within High or Very High FHSZs, such that they, as well as offshore projects, do not have the potential for wildfire impacts to combine with those of the Proposed Project.

Cumulative Impact Analysis

Phase 1

The Orano System ISFSI Modifications (#1) would occur on the DCPP site concurrently with Phase 1 activities. This project would require the construction of precast horizontal storage modules (HSMs) off site and preparation of the existing ISFSI pad for the HSMs. The HSMs would be heavy hauled to the existing ISFSI for final installation, which would require an estimated 384 truck trips to occur simultaneously with Phase 1 truck trips. However, Orano System ISFSI Modifications are expected to be short term compared to Phase 1 of the Proposed Project, and truck trips under this cumulative project would not contribute to a cumulatively considerable increase in impacts relating to emergency access. The Communications Facility (#2) is a PG&E project that would be constructed on Diablo Canyon Road. This project would follow Utility Standard TD-1464S, Preventing and Mitigating Fires While Performing PG&E Work, which establishes requirements for PG&E personnel to follow when traveling to, performing work, or operating outdoors in any forest, brush, or grass-covered land. The Avila Beach Drive at Highway 101 Interchange (#3), Flying Flags Campground (#4), Avila Beach Resort Phased Expansion Development Plan/Coastal Development Permit (#6), and U.S. 101 Pismo Congestion Relief Project (#8) would be required to coordinate with CAL FIRE/County Fire and comply with County permit conditions, as well as local, federal, and state laws and policies relating to construction fire safety. Additionally, while these cumulative projects are in High or Very High FHSZs, they are over 5 miles away from the DCPP, SMVR-SM, and SMVR-SB sites, and over 2 miles away from the PBR site. The Proposed Project would not contribute to a cumulatively considerable increase in wildfire risk.

Phase 2

Two of the cumulative projects are expected to be complete by the time Phase 2 begins in 2032. The Avila Beach Drive at Highway 101 Interchange (#3) is anticipated to conclude in 2025 and U.S. 101 Pismo Congestion Relief Project (#8) is anticipated to conclude in 2029 at the latest. Phase 2 of DCPP decommissioning would result in fewer impacts regarding emergency evacuation routes, wildfire risks, and post-fire risks compared to Phase 1, as demolition activities would decrease. With fewer ongoing cumulative projects and a lower level of activity at the DCPP site during Phase 2, the Proposed Project would not contribute to a cumulatively considerable increase in wildfire risk.

Post-Decommissioning Operations

Post-decommissioning operations would not contribute to a cumulatively considerable increase in wildfire risk. Post-decommissioning activities at the revised OCA would be minimal and limited to monitoring and securing the ISFSI and GTCC Waste Storage Facility. Defensible space would also be maintained in the revised OCA in accordance with CAL FIRE/County requirements. Operation of the Marina would not result in substantial wildfire risks, as visitor activities would be confined to paved areas and the Pacific Ocean.

4.17.6 Summary of Significance Findings

Table 4.17-2 presents a summary of the environmental impacts, significance determinations, and mitigation measures for the Proposed Project.

Table 4.17-2. Summary of Impacts and Mitigation Measures – Wildfire

Impact Statement	Impact Significance Class				Mitigation Measures
	Phase 1		Phase 2	Post-Decom	
	DCPP	*PBR/SB*	*DCPP*	*Ops/Marina*	
WF-1: Substantially impair an adopted emergency response plan or emergency evacuation plan	II	II/II	II	II/III	**PSU-1:** Facility Plan Updating, Tracking, and Reporting **PSU-2:** Retain the Diablo Canyon Fire Department and Emergency Facilities **TRA-1:** Truck Transportation Outside of Peak Hours **TRA-2:** Specialty Heavy-Haul Transport Vehicle Transportation Management Plan
WF-2: Exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby expose workers or residences to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire	II	III/III	II	III/III	**PSU-1:** Facility Plan Updating, Tracking, and Reporting **PSU-2:** Retain the Diablo Canyon Fire Department and Emergency Facilities
WF-3: Exacerbate fire risk or result in temporary or ongoing impacts to the environment due to the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities)	II	III/III	II	III/III	**BIO-3:** Implement Oak and Native Mature Tree Protection Measures **PSU-1:** Facility Plan Updating, Tracking, and Reporting
WF-4: Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes	II	III/NI	II	III/III	**PSU-1:** Facility Plan Updating, Tracking, and Reporting **PSU-2:** Retain the Diablo Canyon Fire Department and Emergency Facilities
Cumulative Impact	Not cumulatively considerable		Not cumulatively considerable		None required

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