

H. Mitigation Monitoring and Reporting

A Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) has been prepared for the DCPP Steam Generator Replacement Project and Alternatives to ensure enforcement of the Project Protocols (identified in PG&E's PEA and incorporated into this EIR) and mitigation measures (listed in Sections D.2 through D.13) that are adopted as conditions of approval to lessen or avoid known and potential project impacts. Section H.1 provides an introduction to the MMCRP process and describes the roles and responsibilities of the government agencies involved in implementing and enforcing the MMCRP. As part of the MMCRP, a detailed Mitigation Compliance Plan will be prepared that provides project details, information on agency jurisdictions and implementation of project mitigation measures.

If approved, actual construction of the Proposed Project is not expected to begin for four to five years. Like any other project, there may be a potential for the project to change or be modified during that time period, which may require the CPUC to revisit the impact analysis through the preparation of an addendum or supplemental EIR.

H.1 Introduction to MMCRP

H.1.1 Authority and Purpose of MMCRP

The California Public Utilities Code confers authority upon the CPUC to regulate the terms of service and the safety, practices, and equipment of utilities subject to its jurisdiction. It is the standard practice of the CPUC, pursuant to its statutory responsibility to protect the environment, to require that mitigation measures stipulated as conditions of approval are implemented properly, monitored, and reported. In 1989, this requirement was codified statewide as Section 21081.6 of the Public Resources Code, which requires a public agency to adopt a Mitigation Monitoring, Compliance, and Reporting Program when it approves a project that is subject to the preparation of an EIR and where the EIR for the project identifies significant adverse environmental effects. *CEQA Guidelines* Section 15097 was added in 1999 to further clarify agency requirements for mitigation monitoring or reporting.

The purpose of a MMCRP is to ensure that measures adopted to mitigate or avoid significant impacts of a project are implemented. The CPUC views the MMCRP as a working guide (or program) to facilitate not only the implementation of mitigation measures by the project proponent, but also the monitoring, compliance, and reporting activities of the CPUC and any monitors it may designate.

H.1.2 MMCRP Adoption Process

The CPUC will address its responsibility under Public Resources Code Section 21081.6 when it takes action on PG&E's Application for Authority to Increase Revenue Requirements to Recover the Costs to Replace Steam Generators in Units 1 and 2 of the Diablo Canyon Power Plant. If the CPUC approves the application, it will also adopt a MMCRP that includes the mitigation measures as a condition of approval.

H.2 Roles and Responsibilities

H.2.1 Monitoring Responsibility

As the lead agency under CEQA, the CPUC is required to monitor this project to ensure that the required mitigation measures are implemented. The CPUC will be responsible for ensuring full compliance with the provisions of this MMCRP and has primary responsibility for implementation of the MMCRP. The purpose of the MMCRP is to document that the mitigation measures required by the CPUC are implemented and that mitigated environmental impacts are reduced to the level identified in the Final EIR.

The CPUC may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as affected jurisdictions and cities. The number of construction monitors assigned to the project will depend on the number of concurrent construction activities and their locations. The CPUC, however, will ensure that each person delegated any duties or responsibilities is qualified to monitor compliance.

Any mitigation measure study or plan that requires the approval of the CPUC must allow at least 60 days for adequate review time. When a mitigation measure requires that a mitigation program be developed during the design phase of the project, the Applicant must submit the final program to CPUC for review and approval at least 60 days before construction begins. Other agencies and jurisdictions may require additional review time. It is the responsibility of the environmental monitor to ensure that appropriate agency reviews and approvals are obtained.

The CPUC, along with its environmental monitors, will also ensure that any variance process or deviation from the procedures identified under the MMCRP is consistent with CEQA requirements; no project variance will be approved by the CPUC if it creates new significant impacts. A variance should be strictly limited to minor project changes that would not trigger other permit requirements, would not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. A Proposed Project change that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required. Any proposed deviation from the approved project, adopted mitigation measures, and correction of such deviation, shall be reported immediately to the CPUC and the environmental monitor assigned to the construction phase for the CPUC's collective review and approval. In some cases, a variance may also require approval by a CEQA responsible agency.

H.2.2 Enforcement Responsibility

The CPUC is responsible for enforcing the procedures adopted for monitoring through the environmental monitor assigned to each construction phase. The environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report any problems to the CPUC.

The CPUC has the authority to halt any construction, operation, or maintenance activity associated with the DCPP Steam Generator Replacement Project if the activity is determined to be a deviation from the approved project or adopted mitigation measures. The CPUC may assign this authority to the environmental monitor for each phase of activity.

H.2.3 Mitigation Compliance Responsibility

The Applicant, PG&E, is responsible for successfully implementing all the adopted mitigation measures in the MMCRP. The Mitigation Compliance Plan included in the MMCRP will contain criteria that define whether mitigation is successful. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include success criteria that are listed in the table at the end of each issue area section. Additional mitigation success thresholds will be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

The Applicant shall inform the CPUC and its monitors in writing of any mitigation measures that are not or cannot be successfully implemented. The CPUC, in coordination with its monitors, will assess whether alternative mitigation is appropriate and specify to PG&E the subsequent actions required.

H.2.4 Dispute Resolution

It is expected that the MMCRP will reduce or eliminate many potential disputes. However, even with the best preparation, disputes may occur. In such an event, the following steps will be applied:

- Step 1.** Disputes and complaints (including those of the public) should be directed first to the CPUC's designated Project Manager for resolution. The Project Manager will attempt to resolve the dispute.
- Step 2.** Should this informal process fail, the CPUC Project Manager may initiate enforcement or compliance action to address deviations from the mitigation measures in the Final EIR or the MMCRP.
- Step 3.** If a dispute or complaint cannot be resolved informally or through enforcement or compliance action by the CPUC, any affected participant in the dispute or complaint may file a written "notice of dispute" with the CPUC's Executive Director. This notice should be filed in order to resolve the dispute in a timely manner, with copies concurrently served on other affected participants. Within 10 days of receipt, the Executive Director or designee(s) shall meet or confer with the filer and other affected participants for purposes of resolving the dispute. The Executive Director shall issue an Executive Resolution describing his/her decision and distribute it to the project service list.
- Step 4.** If one or more of the affected parties is not satisfied with the decision as described in the Resolution, such party may appeal it to the CPUC via a procedure to be specified by the Commission.

Parties may also seek review by the CPUC through existing procedures specified in the Commission's Rules of Practice and Procedure for formal and expedited dispute resolution, although a good faith effort should first be made to use the above procedure.

H.3 General Monitoring Procedures

H.3.1 Environmental Monitor

In coordination with PG&E, the CPUC and its environmental monitors will be responsible for integrating the procedures of the MMCRP into all aspects of project implementation. To oversee the project and to ensure successful mitigation, the environmental monitor assigned to each area of construction must be

onsite during project implementation to remain apprised of project status and to report and remediate any non-compliance activity. The environmental monitor is responsible for ensuring that all procedures specified in the MMCRP are followed.

H.3.2 Construction Personnel

A key feature contributing to the success of mitigation monitoring will be obtaining the full cooperation of construction personnel and supervisors. Many of the mitigation measures require action on the part of the construction supervisors and personnel for successful implementation. To ensure proper implementation, the following actions will be taken:

- PG&E will prepare contracts to be signed by the construction companies hired for the project that outline the purposes and procedures for successful mitigation. Similarly, PG&E will have the contract signed by all construction crews and other personnel prior to working on the job site, denoting agreement.
- Prior to working on the job site, all construction personnel will be required to attend an informational training session, which will outline the mitigation requirements of the project.
- Each construction supervisor will be provided with a written summary of the mitigation monitoring procedures and will be expected to keep those and all other necessary permits onsite for easy reference by the construction crew, and for review and inspection by the CPUC environmental monitors.

H.3.3 General Reporting Procedures

The CPUC and environmental monitors will report all problems that may arise and will take the appropriate action to rectify any problems. Site visits and specific monitoring procedures performed by other individuals, such as biologists or archaeologists, will be reported to the appropriate CPUC environmental monitor. A record will be submitted to the CPUC environmental monitor by the individual conducting the visit or procedure so that details of the visit can be tracked and recorded. In addition, the CPUC environmental monitor will prepare daily reports describing the status of construction activities as well as the timing and completion of any MMCRP requirements.

PG&E shall provide the CPUC with written weekly reports of the status of the project, which shall include construction progress, resulting impacts, resulting mitigation, and all other noteworthy elements of the project. Weekly reports shall be required until all Project Protocols and mitigation measures have been completed.

H.3.4 Public Access to Records

The public is allowed access to the records and reports used to track the implementation of the MMCRP. Monitoring records and reports will be made available for public inspection by the CPUC on request. In order to facilitate the public's awareness, the CPUC will make weekly reports available on the project website below. The following website can also be consulted for further information about mitigation monitoring and reporting for the DCPP Steam Generator Replacement Project:

<http://www.cpuc.ca.gov/environment/info/aspen/diablocanyon/diablocanyon.htm>

H.4 Mitigation Compliance Plan

As described above, a detailed Mitigation Compliance Plan will be prepared that incorporates project details, agency jurisdictions and an implementation plan for mitigation measures for the Proposed Project. This plan will be used by the construction crews and the field monitors in implementing the specific measures in the field in order to reduce impacts to a less than significant level. Components of the Mitigation Compliance Plan include the following:

Project Description. The Mitigation Compliance Plan will contain a concise overview and reference description of the approved project that clearly outlines its physical locations and timetable, construction plans, working maps and plans.

Agency Jurisdictions. The Mitigation Compliance Plan will include the list of agencies with jurisdiction over the project (from EIR Table A-2), and a description of where their respective jurisdictions exist. For example, for a given construction phase, the Plan would state what region of the California Department of Fish and Game has jurisdiction and provide the name of the regional manager, the address, telephone and fax numbers.

Mitigation Monitoring Programs. The Mitigation Compliance Plan will organize and display the individual issue area Mitigation Monitoring Programs presented in the Final EIR. Each mitigation measure will be numbered and described briefly. The Final EIR would be consulted for an in-depth discussion of each mitigation measure. The Mitigation Monitoring Plan will also include:

- The party responsible, the schedule and the reporting requirements for carrying out the monitoring activity for each mitigation measure; and
- Effectiveness criteria for evaluating the implementation of the mitigation measure.

H.5 Condition Effectiveness Review

In order to fulfill its statutory mandates to mitigate or avoid significant effects on the environment and to design a MMCRP to ensure compliance during project implementation (CEQA 21081.6):

- The CPUC may conduct a comprehensive review of conditions that are not effectively mitigating impacts at any time it deems appropriate, including as a result of the Dispute Resolution procedure outlined in Section H.2.4; and
- If in any review, the CPUC determines that any conditions are not adequately mitigating significant environmental impacts caused by the project, or that recent proven technological advances could provide more effective mitigation, then the CPUC may impose additional reasonable conditions to effectively mitigate these impacts.

These reviews will be conducted in a manner consistent with the CPUC's rules and practices.

H.6 Mitigation Monitoring Program Tables

Mitigation monitoring tables are presented at the end of each issue area section (Sections D.2 through D.14) and copied here for convenience. These tables, along with the full text of mitigation measures, form the basis of the MMCRP.

Mitigation Monitoring Program – Air Quality

IMPACT A-1	Replacement activities would cause emissions from transport and construction equipment (Class II)
MITIGATION MEASURE	A-1a: Develop and implement a trip reduction plan. PG&E shall develop and implement a Trip Reduction Plan in cooperation with the SLOAPCD and CPUC to provide emission and congestion benefits for the duration of the steam generator replacement project. The goal of the plan shall be to achieve an average project-worker vehicle occupancy-trip reduction of 50 percent as established by Mitigation Measure T-3a of 2.0 and a project-worker vanpool ridership of 10 percent. The plan shall be approved by the SLOAPCD and CPUC at least 60 days before commencement of transport or construction activities.
Location	All work areas
Monitoring / Reporting Action	Provide <u>Construction Activity Management Plan (CAMP) including a</u> Trip Reduction Plan approved by SLOAPCD to CPUC before commencing transport or construction activities
Effectiveness Criteria	Evidence of plan success by periodic observation of vehicle counts <u>occupancy and vanpool ridership</u>
Responsible Agency	CPUC, SLOAPCD
Timing	During all steam generator replacement activities
MITIGATION MEASURE	A-1b: Develop and implement a diesel combustion emission control plan. PG&E shall develop and implement a Diesel Combustion Emission Control Plan to implement the SLOAPCD recommendation of Best Available Control Technology for construction equipment (CBACT). The plan shall specify use of diesel combustion emission control measures consistent with recommendations identified in the most-recent SLOAPCD CEQA Air Quality Handbook, such as, but not limited to <u>idling limitations</u> , diesel oxidation catalysts, catalyzed diesel particulate filters, or other District approved emission reduction retrofit devices. The plan and CBACT approach shall be developed in cooperation with SLOAPCD and CPUC staff before commencing transport or construction activities. The complete plan shall be submitted to the CPUC at least 60 days prior to transport <u>or construction</u> activities.
Location	All work areas
Monitoring / Reporting Action	Provide <u>Construction Activity Management Plan (CAMP) including a</u> Diesel Combustion Emission Control Plan approved by SLOAPCD to CPUC before commencing transport or construction activities
Effectiveness Criteria	Evidence of plan success by periodic inspection of diesel equipment
Responsible Agency	CPUC, SLOAPCD
Timing	During all steam generator replacement activities
MITIGATION MEASURE	A-1c: Offset tugboat NOx emissions with an offsite mitigation program. PG&E shall develop and implement or fund an offsite mitigation program that would provides approximately 1.544 tons of NOx reductions from existing sources in the Avila Beach and Port San Luis communities. <u>PG&E shall initiate this program such that the emission reduction project(s) is in place prior to commencing the RSG transport activities.</u> PG&E shall accomplish this either by developing and implementing a program of reductions (e.g., installing diesel engine or marine vessel emission control systems) or by providing mitigation funding <u>and a 15 percent administration fee</u> to the SLOAPCD for emission-reducing projects identified by the SLOAPCD (e.g., through the Carl Moyer Program). If PG&E elects to implement its own emission reductions, then the approach shall be developed in cooperation with SLOAPCD and CPUC staff.
Location	Avila Beach and Port San Luis
Monitoring / Reporting Action	Provide <u>Construction Activity Management Plan (CAMP) including an</u> offsite mitigation program approved by SLOAPCD to CPUC and implement before commencing offloading or transport activities
Effectiveness Criteria	Written description of mitigation program and record of program funding
Responsible Agency	CPUC, SLOAPCD
Timing	Prior to and during replacement steam generator transport activities

Mitigation Monitoring Program – Air Quality, *cont.*

MITIGATION MEASURE	A-1d: Conduct an acute health hazard screening analysis for the toxic diesel component acrolein. <u>At least 60 days prior to the start of transport activities.</u> PG&E shall perform an acute health hazard screening analysis for acrolein emissions during offloading and transport activities at Port San Luis and submit the analysis to the SLOAPCD and CPUC. The health hazard index shall be identified for the point of maximum impact, and all locations with a health hazard index greater than 1.0 shall be identified. PG&E shall consult with SLOAPCD staff to determine the appropriate level of mitigation (e.g., by restricting access or changing the proposed sequence of activities to minimize emissions) if the screening analysis reveals a maximum health hazard index greater than 0.1. PG&E shall develop and implement a strategy approved by SLOAPCD for temporarily restricting public access from any location where the acute health hazard index would be greater than 1.0, if necessary, before commencing offloading or transport activities.
Location	Avila Beach and Port San Luis
Monitoring / Reporting Action	Provide copy of screening analysis to CPUC and access strategy approved by SLOAPCD, if necessary, before commencing offloading or transport activities
Effectiveness Criteria	Copy of screening analysis and evidence of approval by SLOAPCD
Responsible Agency	CPUC, SLOAPCD
Timing	Prior to replacement steam generator transport activities
IMPACT A-2	Construction of the Original Steam Generator Storage Facility would cause emissions from portable concrete batch sources (Class II)
MITIGATION MEASURE	A-2a: Use registered portable equipment. PG&E or its contractor shall (1) use portable concrete batch sources that are registered in the Statewide Portable Equipment Registration Program or permitted by the SLOAPCD; and (2) maintain the portable equipment according to the specifications of the Program or SLOAPCD. PG&E shall provide evidence to CPUC indicating that appropriate registration or permits are in place.
Location	Onsite
Monitoring / Reporting Action	<u>Provide Construction Activity Management Plan (CAMP) approved by SLOAPCD with appropriate registration or permits for the</u> Register affected sources <u>with CARB or SLOAPCD</u>
Effectiveness Criteria	Provide evidence of valid registration for sources to CPUC
Responsible Agency	CPUC, CARB or SLOAPCD
Timing	Before and during construction of OSG Storage Facility

Mitigation Monitoring Program – Biological Resources

IMPACT B-3 **Vessel traffic would increase the likelihood of collisions with protected marine mammals (Class II)**

MITIGATION MEASURE **B-3a: Marine Mammal Observer Training.** Under the direction of PG&E, vessel operators shall be trained by a marine mammal expert, provided by PG&E, to recognize and avoid marine mammals. The operators shall be retrained annually. Retraining sessions shall focus on the identification of marine mammal species, the specific behavior of species common to the project area, and awareness of seasonal concentrations of marine mammals. In addition, PG&E shall meet with the vessel operator prior to final transport to Port San Luis to convey all requirements regarding marine mammal safety measures. PG&E shall also provide a minimum of two marine mammal observers on all support vessels during the spring and fall gray whale migration periods and during periods/seasons having high concentrations of marine mammals in the project area. PG&E shall provide written documentation to CPUC verifying meetings with the vessel operators and identifying the marine mammal observers. Gray whales can be present from December to May, with the greatest numbers in January during the southward migration. A secondary peak occurs in March during the northward migration.

The observers shall have unobstructed views onboard each vessel and shall serve as lookouts so that collisions with marine mammals can be avoided. Additionally, PG&E shall provide to vessel operators and CPUC a contingency plan that focuses on avoidance procedures when marine mammals are encountered at sea. Minimum components of the plan shall include:

- Vessel operators shall make every effort to maintain a distance of 1,000 feet from sighted whales and other threatened or endangered marine mammals or marine turtles.
- Support vessels shall not cross directly in front of migrating whales or any other threatened or endangered marine mammals or marine turtles.
- When paralleling whales, support vessels shall operate at a constant speed that is not faster than the whales.
- Female whales shall not be separated from their calves.
- Vessel operators shall not herd or drive whales.
- If a whale engages in evasive or defensive action, support vessels shall drop back until the animal moves out of the area.
- Any collisions with marine wildlife shall be reported promptly to the federal and State agencies listed below pursuant to each agency's reporting procedures:
 - National Marine Fisheries Service
 - California Department of Fish and Game.

Location	Transportation route between Ports of Los Angeles/Long Beach and Port San Luis.
Monitoring / Reporting Action	Continuous monitoring, reporting only if incident occurs.
Effectiveness Criteria	Avoidance of marine mammal strike.
Responsible Agency	CPUC, CDFG, NMFS
Timing	Prior to RSG transport

IMPACT B-5 **Vehicular travel into undisturbed areas could directly impact native vegetation (Class II)**

MITIGATION MEASURE **B-5a: Delineation of Disturbance Limits.** Limits of disturbance shall be clearly marked with construction fencing and approved by CPUC prior to project related activities at the site to ensure that there is no incursion of construction equipment or deposition of materials into habitats outside of the defined area. The construction fence shall remain in place for the duration of the active phase at the location.

Location	Replacement Steam Generator Temporary Storage Area
Monitoring / Reporting Action	CPUC shall verify placement, maintenance, and compliance
Effectiveness Criteria	Fence remains intact for duration of project work at this location
Responsible Agency	CPUC
Timing	Prior to project activities until end of active phase

Mitigation Monitoring Program – Biological Resources, *cont.*

IMPACT B-6	Deposition of excavated materials could result in indirect impacts to vegetation and wildlife habitat (Class II)
MITIGATION MEASURE	B-6a: Revegetation of Soil Disposal Areas. The Applicant shall prepare and implement a revegetation plan to be approved by CPUC prior to approval of the project. The revegetation plan will provide for long-term stabilization and revegetation of the soil stockpile areas associated with the project. The plan shall provide for development of long-term native plant cover compatible with surrounding areas of undisturbed native vegetation and wildlife habitat using local genetic sources of seed or cuttings for all native plant material. The plan shall include provisions for regular monitoring, maintenance including replacement of plants as needed, exotic species control, and performance assessment by a qualified independent third-party monitor. The revegetated areas shall achieve at least 75 percent of the native cover of appropriate reference sites in the general vicinity of the impact area as approved by CPUC. This performance standard shall be met within five years.
Location	Soil disposal area for OSG Storage Facility site
Monitoring / Reporting Action	Preparation of revegetation plan, implementation of plan, regular maintenance and monitoring events. The plan shall be submitted to and approved by the CPUC prior to approval of the project.
Effectiveness Criteria	Meets 75 percent native cover performance criteria
Responsible Agency	CPUC
Timing	Plan to be developed prior to project approval, measure to be implemented until performance standards are met

Mitigation Monitoring Program – Cultural Resources

IMPACT C-1	Ground-disturbing activity may damage or destroy previously undetected cultural resources (Class II)
MITIGATION MEASURE	C-1a: Cultural Resources Treatment Plan (CRTP). PG&E shall develop a CRTP for potential cultural resources should construction of the TSAs require ground-disturbing activities, including procedures for protection and avoidance of Environmentally Sensitive Areas and Archaeological High-Probability Areas, and evaluation and treatment of the unexpected discovery of cultural resources including Native American burials; detailed reporting requirements by the Project archaeologist; curating any cultural materials collected during the Project; and requirements to specify that archaeologists and other discipline specialists meet the Professional Qualifications Standards mandated by the California OHP. Current project design ensures that known and recorded cultural resources will be avoided during construction, and operation and maintenance. Specific protective measures shall be defined in the CRTP to reduce the potential adverse impacts on any currently undetected cultural resources to less than significant levels. The CRTP shall be submitted to the CPUC for review and approval at least 60 days before the start of construction.
Location	TSA Proposed Project, TSA Alternative A, TSA Alternative B, and TSA Alternative C
Monitoring / Reporting Action	CPUC to review CRTP
Effectiveness Criteria	Previously undetected cultural resources in designated sensitive areas are identified by the PG&E archaeological monitor. Previously undetected resources are properly managed after identification by the archaeological monitor as outlined in the CRTP
Responsible Agency	CPUC
Timing	At least 60 days prior to the start of construction
MITIGATION MEASURE	C-1b: Construction Monitoring. Archaeological monitoring shall be conducted by a qualified archaeologist familiar with the types of historic and prehistoric resources that could be encountered ground-disturbing construction. The qualifications of the principle archaeologist shall be approved by the CPUC.
Location	TSA Proposed Project, TSA Alternative A, TSA Alternative, and TSA Alternative C
Monitoring / Reporting Action	CPUC to approve qualifications of archaeological monitor. CPUC to coordinate with principal archaeologist to verify that PG&E archaeologist monitors the designated locations and follows procedures outlined in CRTP in the event of unanticipated discoveries
Effectiveness Criteria	Previously undetected cultural resources in designated sensitive areas are identified by the PG&E archaeological monitor. Previously undetected resources are properly managed after identification by the archaeological monitor as outlined in the CRTP.
Responsible Agency	CPUC
Timing	During project construction, when ground-disturbing activity planned in locations

Mitigation Monitoring Program – Geology, Soils, and Paleontology

IMPACT G-1	Extremely heavy loads could mobilize unstable ground along transport route (Class II)
MITIGATION MEASURE	<p>G-1a: Prevent overloading of unstable ground along transport route. Existing geotechnical reports shall be reviewed by PG&E/CPUC not less than one year prior to the scheduled transport of the RSGs. PG&E/CPUC shall determine if the existing reports provide sufficient information to establish that the load-bearing capacity of soils and geologic features <u>at the offloading area or</u> along the transport route would support the loads, or if additional studies are necessary. If new studies are necessary, they shall be completed not less than ten months prior to commencement of the Proposed Project.</p> <p>Either the existing geological reports or new studies shall meet the following performance criteria not less than six months before the scheduled start of transport activities:</p> <ul style="list-style-type: none"> • Report clearly identifies any and all unstable portions of the transport route. • PG&E or its consultant shall develop plans for any necessary road improvements, which shall be reviewed by the CPUC or its consultant to ensure that proposed improvements would both (1) ensure ground stability of all roads to be used during transport, and (2) remain within the footprint of the proposed route (as defined in the Proposed Project or the Replacement Steam Generator Offloading Alternative) so as to ensure that there would be no additional environmental impacts. <p>Any and all necessary road improvements shall be completed at least 60 days prior to the scheduled start of transport activities. The CPUC or its environmental monitor shall ensure construction activities remain within the defined road footprint. In addition, the CPUC or its consultant shall survey the transport route after the completion of construction but before the start of transport activities to ensure that <u>completed all necessary</u> improvements <u>successfully stabilized appropriate portions of</u> have been implemented on all roads to be used during transport.</p>
Location	Entire transport route
Monitoring / Reporting Action	Letter report providing summary of geotechnical reports reviewed; New reports if necessary; CPUC to review and approve any road improvements; CPUC to verify stability of road(s) after completion of all reports and construction but before transport
Effectiveness Criteria	Route not damaged during project; roadway capable of supporting heavy loads; no additional environmental impacts from stabilization of transport route
Responsible Agency	CPUC, County of San Luis Obispo, <u>Port San Luis Harbor District</u>
Timing	Prior to start of project (see text of measure for exact time limits)
IMPACT G-2	Temporary effects of earthquake shaking could endanger worker safety (Class II)
MITIGATION MEASURE	<p>G-2a: Protect workers from temporary effects of earthquake shaking. The Applicant shall produce a safety plan that specifically includes measures that will be taken to ensure worker safety during earthquake-caused ground shaking. Elements of the plan should include, but not be limited to the following: (a) a protocol for workers to follow in the event an earthquake occurs; (b) protocols for set-up and management of equipment during the loading, transport, offloading, staging, and installation phases of the project that address the potential effects of ground shaking; (c) training for workers so they will know what to do in the event of an earthquake. CPUC to shall review <u>the safety plan for consistency with California Occupational Safety and Health Standards</u> and approve <u>the</u> safety plan prior to commencement of any Proposed Project activities.</p>
Location	Entire transport route
Monitoring / Reporting Action	Provide copy of Safety Plan
Effectiveness Criteria	No workers injured by effects of seismic shaking during project
Responsible Agency	CPUC, local planning agencies
Timing	Prior to <u>transportation of the RSGs</u> start of Proposed Project

Mitigation Monitoring Program – Geology, Soils, and Paleontology, *cont.*

MITIGATION MEASURE	G-2b: Prevent casualties caused by falling rocks. Rocks and boulders that are precariously situated above portions of the transport route shall be identified and evaluated to determine if they should be removed or stabilized prior to project commencement.
Location	Entire transport route
Monitoring / Reporting Action	Provide letter report stating that the precarious rock survey has taken place and what action has been or will be taken.
Effectiveness Criteria	No workers injured by falling rock during project
Responsible Agency	CPUC, County of San Luis Obispo
Timing	Prior to transport of RSGs along route

IMPACT G-3 **Ground shaking could compromise integrity of the OSG Storage Facility (Class II)**

MITIGATION MEASURE	G-3a: Long Term Seismic Program Update. The analyses completed for the Long Term Seismic Program shall be refined to incorporate new earthquake data that have been derived since publication of the LTSP. This update should be reviewed by the Diablo Canyon Independent Safety Committee, the NRC, and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design. Based on the updated information, a new Design Earthquake (the seismicity characteristics that structure is designed to withstand) would shall be developed for the proposed OSG Storage Facility by PG&E and incorporated into the structural design of the facility. <u>PG&E shall also confirm that the updated information has been submitted to the NRC for consideration in the OSG Storage Facility design plan.</u>
Location	Vicinity of all OSF Storage Facility potential locations
Monitoring / Reporting Action	Submit updated <u>plan information</u> to Diablo Canyon Independent Safety Committee, the NRC, and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design.
Effectiveness Criteria	Updated information on seismic hazards
Responsible Agency	CPUC, County of San Luis Obispo, NRC, Diablo Canyon Independent Safety Committee
Timing	Prior to start of Proposed Project and at least 60 days prior to final approval of the OSG Storage Facility design

IMPACT G-4 **Slope instability could affect design, construction, and functioning of the OSG Storage Facility (Class II)**

MITIGATION MEASURE	G-4a: Evaluate slope stability in the vicinity of the OSG Storage Facility site. A geotechnical evaluation similar to that done for the ISFSI shall be undertaken by PG&E and/or the construction contractor to assess the stability of the north-facing slopes in the area of the proposed OSG Storage Facility, both above and below the level of the current “man camp.” This report should be reviewed and approved by PG&E and the CPUC at least 60 days prior to final approval of the OSG Storage Facility design. Such an evaluation shall include exploratory borings and surface mapping of the north-facing slope. Slope stability evaluation shall include analysis of the dip of layered rock, identification of clay beds, and presence and orientation of small faults and fractures with orientations parallel or subparallel to the slope. Static and dynamic stability analysis shall be performed <u>in accordance with all applicable building codes, considering the information developed under Mitigation Measure G-3</u> causing the most recent seismic acceleration values as derived since the 2003 San Simeon earthquake. If the report indicates either the upper or lower portion of the slope could become unstable, remedial measures (e.g., construction of engineered retaining wall; improved slope drainage; remove excess colluvium; <u>engineering design of the structure to withstand postulated landslide loads</u>) shall be developed or a different location (already analyzed in this EIR) for the OSG Storage Facility shall be selected.
Location	Vicinity of the OSF Storage Facility potential locations

Mitigation Monitoring Program – Geology, Soils, and Paleontology, *cont.*

Monitoring / Reporting Action	Geotechnical report to CPUC at least 60 days prior to final approval of the OSG Storage Facility design
Effectiveness Criteria	Engineering design to stabilize slope and protect improvements during construction and long-term operation
Responsible Agency	CPUC, County of San Luis Obispo, NRC, Diablo Canyon Independent Safety Committee
Timing	Prior to start of Proposed Project and at least 60 days prior to final approval of the OSG Storage Facility design

Mitigation Monitoring Program – Hazardous Materials

IMPACT H-1	Heavy equipment fuel, oil, or hydraulic line leak or rupture could cause hazardous materials release (Class II)
MITIGATION MEASURE	<p>H-1a: Implement DCPD Spill Response Procedures. In the event of a fuel, oil, or hydraulic line leak or rupture, collect spilled fluid with absorbent materials. Prevent or stop spill from spreading to the environment. In the event that a spill reaches bare soil, excavate impacted soil and dispose of with absorbent materials. <u>In the event that a spill occurs on Port San Luis Harbor District property or in ocean water, Central Coast RWQCB and Harbor District personnel shall be immediately notified and corrective measures, such as containment, shall be taken immediately.</u> A copy of the DCPD Spill Prevention Control and Countermeasure Plan shall remain with the contractor at all times.</p> <p>In addition, PG&E shall develop and implement a worker environmental training program that communicates to all appropriate personnel location-specific environmental concerns and appropriate work practices, including spill prevention and response measures, as well as site-specific physical conditions to lessen the impact of potential spills (i.e., identification of flow paths to sensitive resources). A copy of this plan shall be submitted for CPUC approval prior to commencement of RSG transport activities.</p>
Location	Transport routes, staging areas, construction sites, and disposal area(s)
Monitoring / Reporting Action	Per DCPD Spill Prevention Control and Countermeasure Plan report to RWQCB
Effectiveness Criteria	Continuous monitoring
Responsible Agency	CPUC
Timing	Before and during all steam generator replacement activities
MITIGATION MEASURE	<p>H-1b: Conduct Routine Inspections and Maintenance of Transporter. All transporter vehicles shall be inspected at the beginning of each work day, during any stop of 15 minutes or longer, and at the end of each work shift. <u>While in transport, continual visual inspections shall be conducted by the crew. If any leaks are observed during transport, appropriate action shall be taken to stop the leak prior to the continuance of transport. Any necessary spill response shall be conducted according to Mitigation Measure H-1a. Temporary drip pans shall be used to contain leak from slow leaking equipment (for example, dripping oil or hydraulic line). Small leaks shall be repaired at the next scheduled stop after discovery. Large leaks shall be repaired immediately, and the ground shall be protected by 20 mil high density polyethylene (HDPE) or similar barrier until repairs are complete. Routine maintenance or repairs shall be conducted on appropriate containment systems, and all fluids removed from vehicles shall be collected and manifested.</u></p>
Location	Transport routes
Monitoring / Reporting Action	Per DCPD Spill Prevention Control and Countermeasure Plan report to RWQCB
Effectiveness Criteria	Continuous monitoring
Responsible Agency	CPUC
Timing	During transport of steam generators
IMPACT H-2	Heavy equipment maintenance could cause hazardous materials release (Class II)
MITIGATION MEASURE	<p>H-2a: Properly Handle Maintenance Waste. Routine maintenance or unscheduled repairs shall be conducted on appropriate containment systems, and all fluids removed from vehicles or used for cleaning shall be properly contained, labeled, and manifested, according to the procedures of the DCPD Spill Prevention Control and Countermeasure Plan. All hazardous waste shall be properly disposed of in accordance with federal and state regulations, and local ordinances. <u>Storage of hazardous material on property outside of DCPD (e.g., Port San Luis Harbor District) shall be prohibited unless a license (or agreement) from the property owner and an insurance policy or bond for clean-up are obtained.</u> In addition, the worker environmental training program discussed in Mitigation Measure H-1a shall include discussion of material handling, storage, and disposal procedures per applicable regulations and designed to ensure hazardous materials are handled and contained safely.</p>

Mitigation Monitoring Program – Hazardous Materials, cont.

Location	Transport routes, staging areas, construction sites, and disposal area(s)
Monitoring / Reporting Action	Per DCPD Spill Prevention Control and Countermeasure Plan report to RWQCB
Effectiveness Criteria	Continuous monitoring
Responsible Agency	CPUC
Timing	During all steam generator replacement activities
IMPACT H-3	Previously unknown contaminated soil/groundwater could be encountered during construction (Class II)
MITIGATION MEASURE	H-3a: Stop Work and Notify Appropriate Project Personnel and Regulators. If impacted soil and/or groundwater is encountered during excavation and/or groundwater dewatering, work shall stop immediately. Impacted soil shall be placed on 20-mil HDPE and covered. The construction superintendent, designated PG&E and CPUC personnel, and applicable regulatory agencies shall be notified immediately. Contingency planning for such an event shall be conducted prior to start of work. The nature and extent of contamination shall be identified through soil and/or water testing, and appropriate remedial action proposed and approved by the CPUC prior to disturbing additional material.
Location	Proposed construction areas requiring excavation and/or groundwater dewatering.
Monitoring / Reporting Action	Monitor excavated soil and/or pumped groundwater for potential impacts from previous and unknown unauthorized releases of hazardous materials. If encountered, stop work and notify superintendent, DCPD project manager, and CPUC.
Effectiveness Criteria	HAZWOPER 24-hour Supervisor Training for the Construction Foreman and continuous monitoring
Responsible Agency	CPUC
Timing	During construction excavation and/or dewatering

Mitigation Monitoring Program – Hydrology and Water Quality

IMPACT W-1	Offloading the generators at Port San Luis could disturb marine sediments or accidentally introduce contaminants to the ocean water (Class II)
MITIGATION MEASURE	Implement Mitigation Measures H-1a (Implement DCPSP Spill Response Procedures), H-1b (Conduct Routine Inspections and Maintenance of Transporter), and H-2a (Properly Handle Maintenance Waste).
Location	As in Mitigation Measures H-1a, H-1b, and H-2a (see Table D.6-5)
Monitoring / Reporting Action	As in Mitigation Measures H-1a, H-1b, and H-2a (see Table D.6-5)
Effectiveness Criteria	As in Mitigation Measures H-1a, H-1b, and H-2a (see Table D.6-5)
Responsible Agency	CPUC
Timing	During all steam generator replacement activities
IMPACT W-2	Construction and use of staging and preparation areas could result in disturbance of sediments or spill of materials that would contaminate stormwater (Class II)
MITIGATION MEASURE	<u>W-2a: A SWPPP shall be prepared for construction activities. PG&E shall prepare a SWPPP, and it shall be submitted to the CPUC and the County of San Luis Obispo for review and approval prior to construction activities regardless of disturbance area size. The SWPPP shall contain a site map which shows the construction site perimeter, existing and proposed buildings, lots, roadways, storm water collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP shall list Best Management Practices (BMPs) the discharger will use to protect against polluted storm water runoff. PG&E shall adhere to the SWPPP for all project-related construction activities. Should the total construction area exceed one acre in size, a Notice of Intent and the SWPPP shall be submitted to the RWQCB.</u> Implement Mitigation Measures H-1a (Implement DCPSP Spill Response Procedures) and H-2a (Properly Handle Maintenance Waste).
Location	<u>Laydown area and all construction areas.</u> <u>Also asAs</u> in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Monitoring / Reporting Action	<u>SWPPP to be prepared and submitted to CPUC for review and approval.</u> <u>Also asAs</u> in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Effectiveness Criteria	<u>SWPPP to include monitoring and effectiveness criteria to the satisfaction of the CPUC.</u> As in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Responsible Agency	CPUC
Timing	During all steam generator replacement activities
IMPACT W-3	Fuel or other contaminants associated with heavy equipment used during OSG removal, transport, and storage could spill and contaminate surface waters (Class II)
MITIGATION MEASURE	Implement Mitigation Measures H-1a (Implement DCPSP Spill Response Procedures) and H-2a (Properly Handle Maintenance Waste).
Location	As in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Monitoring / Reporting Action	As in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Effectiveness Criteria	As in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Responsible Agency	CPUC
Timing	During all steam generator replacement activities

Mitigation Monitoring Program – Hydrology and Water Quality, cont.

IMPACT W-4	Fuel or other contaminants associated with heavy equipment used during RSG installation could spill and contaminate surface waters (Class II)
MITIGATION MEASURE	Implement Mitigation Measures H-1a (Implement DCPP Spill Response Procedures) and H-2a (Properly Handle Maintenance Waste).
Location	As in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Monitoring / Reporting Action	As in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Effectiveness Criteria	As in Mitigation Measures H-1a and H-2a (see Table D.6-5)
Responsible Agency	CPUC
Timing	During all steam generator replacement activities

Mitigation Monitoring Program – Land Use, Recreation, and Agriculture

IMPACT L-2	Transport would disrupt recreational activities (Class II)
MITIGATION MEASURE	Implement Mitigation Measure N-1a (Provide advance notice of offloading and transport).
Location	As in Mitigation Measure N-1a (see Table D.9-3)
Monitoring / Reporting Action	As in Mitigation Measure N-1a (see Table D.9-3)
Effectiveness Criteria	As in Mitigation Measure N-1a (see Table D.9-3)
Responsible Agency	As in Mitigation Measure N-1a (see Table D.9-3)
Timing	As in Mitigation Measure N-1a (see Table D.9-3)
MITIGATION MEASURE	L- 2a: Avoid peak recreational usage. PG&E shall not schedule offloading during times of peak recreational usage of Port San Luis (as defined by and coordinated with the Port San Luis Harbor District).
Location	Port San Luis Harbor
Monitoring / Reporting Action	Verification of offloading and transport schedule as compared to peak recreational usage of Port San Luis (as defined by and coordinated with the Port San Luis Harbor District).
Effectiveness Criteria	Offloading occurs outside of peak recreational usage of Port San Luis (as defined by and coordinated with the Port San Luis Harbor District).
Responsible Agency	CPUC, PG&E, Port San Luis Harbor District
Timing	Pre-transport, Transport
MITIGATION MEASURE	L-2b: Schedule Pecho Coast Trail hikes around RSG transport. PG&E shall schedule the twice-weekly Pecho Coast Trail hikes such that they do not occur during transport activities. PG&E shall also ensure that the number of hiking opportunities does not diminish as a result of the Proposed Project. The number of hiking opportunities available shall meet or exceed the current level of twice-weekly hikes of up to 15 people per hike, as discussed above (Section D.8.1).
Location	Pecho Coast Trail – Trailhead at Port San Luis Harbor
Monitoring / Reporting Action	Verification of offloading and transport schedule as compared to scheduled hikes. Number of hiking opportunities as compared to current (Two hikes per week with 15 available spots on each hike).
Effectiveness Criteria	Offloading and transport schedule does not occur at the same time as Pecho Coast Trail hikes. The number of hiking opportunities available meets or exceeds the current level of 15 people per hike, with two hikes per week, as discussed above (Section D.8.1).
Responsible Agency	CPUC, PG&E
Timing	Pre-transport, Transport

Mitigation Monitoring Program – Noise and Vibration

IMPACT N-1	Offloading would temporarily increase local noise levels near sensitive receptors (Class II)
MITIGATION MEASURE	N-1a: Provide advance notice of offloading and transport. PG&E shall provide advance notice <u>of each phase of RSG delivery</u> , between two and four weeks prior to offloading, of planned offloading and transport activities and timing to the CPUC, the Port San Luis Harbor District, <u>Harbor District tenants</u> , and nearby residents within the Port San Luis Trailer Park and the Harbor Terrace area of Port San Luis. The advance notice shall describe the potential noise disruption and the steps PG&E plans to take to minimize the noise (e.g., by enclosing and muffling equipment, <u>eliminating backup signals</u> , or by limiting idling), and it shall provide a page in a format suitable for reproduction and posting by the Harbor District. <u>PG&E shall also hold a meeting for Harbor District tenants between two and four weeks prior to offloading.</u> If project delays of more than two weeks occur, an additional notice shall be made.
Location	Port San Luis Harbor District, Port San Luis Trailer Park, and Harbor Terrace
Monitoring / Reporting Action	Provide notice of offloading activity to local receptors and evidence to CPUC
Effectiveness Criteria	Evidence of advance notice
Responsible Agency	CPUC
Timing	Prior to and during offloading activity
MITIGATION MEASURE	N-1b: Provide liaison for nuisance complaints. PG&E shall identify and provide a liaison person to respond to concerns of noise from offloading activities. Procedures for reaching the liaison via telephone or in person shall be included in notices distributed and posted in accordance with Mitigation Measure N-1a. Nuisance complaints filed with the liaison and the approach used by PG&E to resolve the complaint shall be reported to the CPUC <u>and the Port San Luis Harbor District.</u> <u>Procedures for responding to callers shall be submitted to the CPUC for review and approval prior to offloading.</u>
Location	Port San Luis Harbor District, Port San Luis Trailer Park, and Harbor Terrace
Monitoring / Reporting Action	<u>Provide complaint response procedures to the CPUC at least 60 days prior to offloading.</u> Report complaints and resolution to CPUC
Effectiveness Criteria	Evidence of resolved complaints
Responsible Agency	CPUC, <u>Port San Luis Harbor District</u>
Timing	During offloading activity

Mitigation Monitoring Program – Public Services and Utilities

IMPACT U-1	Project would disrupt utility systems (Class II)
MITIGATION MEASURE	Implement Mitigation Measure G-1a (Prevent overloading of unstable ground along transport route).
Location	As in Mitigation Measure G-1a (see Table D.5-2)
Monitoring / Reporting Action	As in Mitigation Measure G-1a (see Table D.5-2)
Effectiveness Criteria	As in Mitigation Measure G-1a (see Table D.5-2)
Responsible Agency	As in Mitigation Measure G-1a (see Table D.5-2)
Timing	As in Mitigation Measure G-1a (see Table D.5-2)
IMPACT U-2	Project would impede emergency access (Class II)
MITIGATION MEASURE	U-2a: Pre-position emergency responders during road blockages. The access plan submitted to PG&E by the transportation contractor shall include provisions for the pre-positioning of emergency vehicles and personnel prepared to respond to an emergency at DCPP if access cannot be maintained along the transportation route for the RSGs. The Applicant shall coordinate with County emergency service providers <u>and the Port San Luis Harbor District</u> to determine the appropriate resources to be pre-positioned in case of an emergency. A copy of the access plan shall be provided to the CPUC for review and approval prior to any transport activities.
Location	Along RSG and OSG transportation routes
Monitoring / Reporting Action	Review of transportation contractor access plan and monitoring of transport activities by CPUC and safety monitor
Effectiveness Criteria	Appropriate placement of emergency resources with access to DCPP if emergency access cannot be maintained
Responsible Agency	CPUC, CDF/San Luis Obispo County Fire Department, <u>Port San Luis Harbor District</u>
Timing	Prior to and during transport activities

Mitigation Monitoring Program – System and Transportation Safety

IMPACT S-1	RSG barges would create a navigational hazard in Port San Luis (Class II)
MITIGATION MEASURE	<p>S-1a: Barge Navigational Safety Plan. The Applicant shall develop a barge navigational safety plan to minimize the impact on existing Port operations. The plan shall be submitted to, and approved by the Port San Luis Harbor District. At a minimum the plan shall include the following elements:</p> <ul style="list-style-type: none"> • Identify moored vessels that will need to be temporarily relocated, and provide necessary temporary mooring facilities or funding for the Port District to accommodate the temporary relocation of moored vessels. • Identify activities such as home fleet and dry dock operations in the Port that may conflict with barge transport and/or offloading. Working with the Harbor District, identify procedures that will minimize conflicts with existing operations <u>and safety hazards to the public and project personnel.</u> • <u>Identify hazardous wind and swell conditions that would create safety hazards during barge transport within Port San Luis and during barge unloading. Develop written procedures to avoid barge transport and unloading during conditions that would increase the risk of barge collision or capsizing, and conditions that could contribute to an accident during barge unloading.</u> • Working with the Harbor District, identify additional navigational aids and security that will be necessary to safely move the barges through the Port. The Applicant can provide the additional navigational aids and/or security, or contract with the Harbor District to provide the necessary services.
Location	Port San Luis
Monitoring / Reporting Action	Submit Navigational Safety Plan for approval
Effectiveness Criteria	Avoidance of vessel collisions and Port operations
Responsible Agency	CPUC, Port San Luis Harbor District
Timing	Prior to RSG delivery
IMPACT S-2	RSG transport between Port San Luis and the DCPD could impede emergency response vehicles (Class II)
MITIGATION MEASURE	Implement Mitigation Measure U-2a.
Location	As in Mitigation Measure U-2a (see Table D.10-3)
Monitoring / Reporting Action	As in Mitigation Measure U-2a (see Table D.10-3)
Effectiveness Criteria	As in Mitigation Measure U-2a (see Table D.10-3)
Responsible Agency	As in Mitigation Measure U-2a (see Table D.10-3)
Timing	As in Mitigation Measure U-2a (see Table D.10-3)
IMPACT S-5	Seismic activity could compromise the integrity of the OSG Storage Facility (Class II)
MITIGATION MEASURE	Implement Mitigation Measure G-3a.
Location	As in Mitigation Measure G-3a (see Table D.5-2)
Monitoring / Reporting Action	As in Mitigation Measure G-3a (see Table D.5-2)
Effectiveness Criteria	As in Mitigation Measure G-3a (see Table D.5-2)
Responsible Agency	As in Mitigation Measure G-3a (see Table D.5-2)
Timing	As in Mitigation Measure G-3a (see Table D.5-2)
IMPACT S-7	Residual contamination would be present on the OSGs with the potential for radiation exposure during offsite transport (Class III)
MITIGATION MEASURE	<p>S-8a7a: Alternate OSG Barge Loading Site. In order to avoid exposing the public to residual OSG contamination, the Applicant shall utilize the DCPD Intake Cove for OSG barge loading should offsite transport and storage be required.</p>

Mitigation Monitoring Program – System and Transportation Safety, cont.

Location	DCPP, Port San Luis
Monitoring / Reporting Action	Use alternate barge loading site
Effectiveness Criteria	Avoidance of impact
Responsible Agency	CPUC, Port San Luis Harbor District, NRC
Timing	Prior to OSG removal

Mitigation Monitoring Program – Traffic and Circulation

IMPACT T-1	<u>RSG transport may damage roadway/parking infrastructure and would temporarily increase local traffic (Class III)</u>
MITIGATION MEASURE	<u>T-1a: Repair any damage to pavement from the transporter.</u> The Applicant shall repair and bear any costs of repair of any significant damage to pavement (e.g., road or parking lots) that results from the transportation of the RSGs. The repairs shall bring the pavement to the pre-project or better condition.
Location	Implementation of the measure would affect Avila Beach Drive, Diablo Canyon Rd., and any paved roads or parking lots within the Port San Luis. Monitoring and photo documentation shall be done at the Port's parking lot and along the transporter route
Monitoring / Reporting Action	Conduct site visits to assess the road and parking lot conditions before and after the transport, use photo documentation to assess the pre- and post-project pavement conditions. To ensure compliance, conduct a site visit after the repairs (if any) are reported as completed.
Effectiveness Criteria	If the damaged pavement (if any) appears as good or better after the repairs (if any) are completed, the measure is effective
Responsible Agency	CPUC shall assign a qualified environmental monitor, that is also approved by the Harbor District to review the monitoring reports and establish and implement an enforcement action if the measure is not effective
Timing	Review before commencing RSG transportation, conduct site visits during Project implementation
IMPACT T-2	<u>Staging and preparation would temporarily increase local traffic (Class II)</u>
MITIGATION MEASURE	<u>T-2a: Avoid travel during peak season on Avila Beach Drive and other local surface roads.</u> The Applicant shall develop an alternative project schedule that would restrict the project-related personnel from travel on Avila Beach Drive during peak season (e.g., May to August October), evening peak hours of between 4:00 p.m. and 7:00 p.m. In addition, all project-related traffic shall be restricted from travel on Avila Beach Drive during peak season (e.g., May to August October) weekends between the hours of 10:00 a.m. and 5:00 p.m. <u>To achieve this, the Applicant shall not schedule project employees shift changes between 4:00 p.m. and 7:00 p.m. during May to October period, during weekdays. The Applicant shall not schedule project-related or outage-related employee shift changes between the hours of 10:00 a.m. and 5:00 p.m. during May to October period, during weekends.</u>
Location	Implementation of the measure would affect Avila Beach transportation system. Monitoring shall be done at the DCPD secured Access Gate on Diablo Canyon Road
Monitoring / Reporting Action	Review and approval of the alternative project schedule/ <u>shift change orders</u> by CPUC. Conduct site visits during the project implementation to ensure compliance
Effectiveness Criteria	If the Applicant demonstrates approved observable shift schedule <u>fewer than ten project-related vehicles pass through the Access Gate during any peak hour</u> , the measure is effective
Responsible Agency	CPUC shall assign a qualified environmental monitor, review the monitoring reports and establish and implement an enforcement action if the measures are not effective
Timing	Review the alternative schedule before commencing RSG staging and preparation, conduct site visits during project implementation
MITIGATION MEASURE	<u>T-2b: Avoid travel during peak time on Highway 101.</u> The Applicant shall develop an alternative project schedule that would restrict the project-related personnel from travel on Highway 101 during peak hours of operation. Typically, morning peak hours are between 6 a.m. and 8 a.m. and evening peak hours are between 4:00 p.m. and 5:30 p.m. <u>To achieve this, in addition to the shift change restrictions stated in Mitigation Measure T-2a, the Applicant shall schedule project employee shift changes outside of period between 6:00 a.m. and 8:00 a.m. during weekdays.</u>
Location	Implementation of the measure would affect Highway 101 in Avila Beach vicinity. Monitoring shall be done at the DCPD Access Gate on Diablo Canyon Road

Mitigation Monitoring Program – Traffic and Circulation, *cont.*

Monitoring / Reporting Action	Review and approval of the alternative project schedule by CPUC. Site visits during the project implementation to ensure compliance
Effectiveness Criteria	If the Applicant demonstrates approved observable shift schedule fewer than ten project-related vehicles pass through the Access Gate during any peak hour , the measure is effective
Responsible Agency	CPUC shall assign a qualified environmental monitor, review the monitoring reports and establish and implement an enforcement action if the measures are not effective
Timing	Review the alternative schedule before commencing RSG staging and preparation, conduct site visits during project implementation

IMPACT T-3 Steam generator replacement activities would temporarily increase local traffic (Class II)

MITIGATION MEASURE	<p>T-3a: Develop a trip reduction program. The Applicant shall develop a trip reduction program for the Proposed Project. The goal of this program shall be to achieve a 50 percent reduction of project-related vehicle trips during all steam generator replacement activities that overlap with outage periods or normal operation. With such 50 percent reduction, not more than 3,160 vehicles would enter the plant during a 24-hour day. This limit represents vehicles from a normal workforce of 1,400 plus 1,285 outage workers with 475 project-related vehicles representing a two-person average vehicle occupancy for the 950 project-related workers. PG&E shall develop and maintain a daily count of vehicles entering the plant for verifying the success of this program. The program shall that could include but not be limited to the following activities:</p> <ul style="list-style-type: none"> • Provide appropriate offsite parking for the project-related employees and provide a shuttle service between the offsite parking and DCPP. Any parking arrangements shall be approved by the County of San Luis Obispo (and the landowner of the space(s) proposed to be used for parking if not owned by the County) prior to the project commencement. Any parking fees shall be borne by the Applicant. • Provide a shuttle that would be available to all personnel that would enter DCPP during the project, and institute a set of incentive-based measures that would encourage use of the shuttle by all personnel (i.e., regular employees, outage personnel and project-related workers). • Provide a shuttle for the outage personnel, and institute a set of measures that would encourage use of the shuttle by the outage personnel. • Develop a work schedule that would prevent employees traveling on Avila Beach Drive and other local roadways during peak hours <u>as specified in Mitigation Measure T-2a.</u> • <u>Institute administrative measures, potentially through the use of contract terms, to prohibit the project personnel from parking in the local communities such as Avila Beach or Port of San Luis.</u> • Develop a construction materials <u>and machinery</u> -delivery and waste removal program that would avoid project-related and other DCPP service truck traffic on Avila Beach Drive and other local roadways during peak hours <u>as specified in Mitigation Measure T-2a.</u> • <u>Develop a public notification program that allows the public to be informed about the traffic reduction program, project schedule and potential traffic congestion.</u> • <u>The trip reduction program shall be coordinated with and approved by the County of San Luis Obispo and the Port San Luis Harbor District.</u>
Location	Monitoring visits shall be done to the alternative offsite parking sites. <u>Review the DCPP documentation directing work and shift change schedules.</u>
Monitoring / Reporting Action	Review and approval of the trip reduction <u>and traffic control</u> program by CPUC. Site visits to ensure implementation
Effectiveness Criteria	If the total daily number of vehicles entering the plant is no more than 3160 <u>50 percent of the project-related employees use the provided shuttle on the regular basis</u> , the measure is effective
Responsible Agency	CPUC shall assign a qualified environmental monitor, review the monitoring reports and establish and implement an enforcement action if the measures are not effective, <u>coordination with County of San Luis Obispo and the Port San Luis Harbor District</u>
Timing	<u>Review and approve the trip reduction program before the project commencement.</u> During the OSGs removal, transportation and storage

Mitigation Monitoring Program – Traffic and Circulation, *cont.*

MITIGATION MEASURE	T-3b: Avoid travel during peak season on Avila Beach Drive and San Luis Bay Drive. The Applicant shall develop an alternative project schedule that would restrict the project-related and outage personnel from travel on Avila Beach Drive and San Luis Bay Drive during peak season (e.g., May to August) evening peak hours of between 4:00 p.m. and 7:00 p.m. In addition, all project-related and outage traffic shall be restricted from travel on Avila Beach Drive and San Luis Bay Drive during peak season (e.g., May to August) weekends between the hours of 10:00 a.m. and 5:00 p.m.
Location	Implementation of the measure would affect Avila Beach transportation system. Monitoring shall be done at the DCPP secured Access Gate on Diablo Canyon Road
Monitoring / Reporting Action	Review and approval of the alternative project schedule. Site visits during the project implementation to ensure compliance
Effectiveness Criteria	If fewer than ten project-related vehicles pass through the Access Gate during any peak hour, the measure is effective
Responsible Agency	GPUC shall assign a qualified environmental monitor, review the monitoring reports and establish and implement an enforcement action if the measures are not effective
Timing	Review the alternative schedule before commencing OSG removal, conduct site visits during project implementation

Mitigation Monitoring Program – Visual Resources

IMPACT V-1	Short-term visibility of RSGs and transporters to viewers at Harford Pier and San Luis Obispo Bay Viewpoints (Class II)
MITIGATION MEASURE	V-1a: Offloading and transport activities during off-season time periods. RSG offloading and transport shall occur from November through April. If transport during peak recreational season (May through October) is unavoidable, RSG offloading and transport to the DCPP Access Gate shall be timed to take place during weekdays, and should be limited to the shortest feasible period of time.
Location	Harford Pier/Landing
Monitoring / Reporting Action	CPUC/Harbor District to verify that offloading and transport activities will not take place on peak season weekends.
Effectiveness Criteria	RSG offloading and transport will not interfere with visitor-serving businesses on peak season weekends, day or night.
Responsible Agency	CPUC, Port San Luis Harbor District
Timing	No later than 90 days prior to RSG shipment, the Port District shall be notified of schedule and arrangements shall be made to avoid weekend disturbance.
<u>MITIGATION MEASURE</u>	<u>V-1b: Minimize disruptive night lighting in the vicinity of Harford Pier and San Luis Harbor.</u> <u>Nighttime project lighting shall be shielded and directed downward at Harford Pier to avoid subjecting vessel operators in the vicinity to night blindness. To the extent practicable, the Applicant shall also avoid evening transportation lighting between Port San Luis and the DCPP Access Gate on weekends during the peak tourist season (May through October).</u>
<u>Location</u>	<u>Harford Pier/Landing</u>
<u>Monitoring / Reporting Action</u>	<u>CPUC/Harbor District to verify that RSG transport activities in general, and night lighting in particular, do not take place on peak season weekends.</u>
<u>Effectiveness Criteria</u>	<u>RSG offloading and transport will not interfere with visitor-serving businesses on peak season weekend nights.</u>
<u>Responsible Agency</u>	<u>CPUC, Port San Luis Harbor District</u>
<u>Timing</u>	<u>No later than 30 days prior to RSG shipment, the Port District shall be notified of transport operation plans, including confirmation that peak weekend night lighting shall not be required.</u>