

# The Diablo Canyon Lands: A Plan for their Conservation and Future Use

by the Friends of the Diablo Canyon Lands

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## **Table of Contents**

Introduction	1
Members of the Friends of the Diablo Canyon Lands	2
Resources of the Diablo Canyon Lands	2
Modern History of the Diablo Canyon Lands	3
Units of the Diablo Canyon Lands	б
Conservation Framework for the Diablo Canyon Lands	1
Next Steps and Strategies	4
Conclusion	5
Appendices	

#### Introduction

The Diablo Canyon Power Plant (DCPP), operated by Pacific Gas & Electric Company ("PG&E"), is located along the Diablo Coast in San Luis Obispo County. Surrounding the plant are the Diablo Canyon Lands -- more than 12,000, mostly undeveloped acres that have served as a buffer to the plant's nuclear operations for four decades. The lands are owned in part by PG&E and in part by its subsidiary, Eureka Energy.

The DCPP contains two nuclear reactors that will be shut down permanently by 2025. Upon the plant's closure and subsequent decommissioning, the Diablo Canyon Lands will no longer be needed by PG&E or Eureka Energy, and are thus expected to be transferred away by those entities.

There has been considerable community discussion and many questions asked about the future of the Diablo Canyon Lands. For example, who should own these lands after plant closure and decommissioning? How should they be managed? To what extent should these lands be accessible to the public? And how can we ensure the protection of the unique and fragile ecological, scenic, cultural, and other resources found on the lands and coast?

We formed the Friends of the Diablo Canyon Lands to attempt to answer the key questions about the future of the Diablo Canyon Lands. We are not the first group to attempt this, but we have taken the views of others into consideration in developing this plan and its Conservation Framework, which is described in detail in this report and attached as Appendix A.

Our **short-term goal** in preparing this report is to have our recommendations included in the 2021 PG&E Nuclear Decommissioning Cost Triennial Proceeding (NDCTP). The NDCTP is prepared every three years by PG&E and submitted to the California Public Utilities Commission (CPUC) for approval. It thereafter serves as a blueprint for plant decommissioning and the future of the lands. PG&E has specifically requested input on the Diablo Canyon Lands for the 2021 NDCTP and this report is in response to its request. (For more information about PG&E's outreach efforts on the Diablo Canyon Lands, visit: <a href="https://www.pge.com/en\_US/safety/how-the-system-works/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diab

Our **long-term goal** in preparing this report is to see the recommendations contained in this report successfully implemented for the benefit of people and wildlife for generations to come.

## Members of the Friends of the Diablo Canyon Lands

In presenting the recommendations and/or observations contained herein, we formed a group of individuals and organizations that share the common desire of conserving in-perpetuity the ecological, cultural, and scenic resources of the Diablo Canyon Lands, while providing for sustainable, managed public access. The Friends include environmental, conservation, and other non-profit organizations; potential land owners; recreational advocates including equestrians, mountain bikers, hikers, and other access proponents; various federal, state, and local entities/agencies; economic development proponents; and communities adjacent to the Diablo Canyon Lands. See Appendix B for the full list of the Friends of the Diablo Canyon Lands.

## Resources of the Diablo Canyon Lands

The approximately 12,000-acre Diablo Canyon Lands are located in San Luis Obispo County, California. They are owned in part by PG&E and in part by its subsidiary, Eureka Energy. Other than the area where the Diablo Canyon Power Plant (and its ancillary facilities and structures) is located, the land is virtually undeveloped.

#### **Ecological and Scenic Resources**

The Diablo Canyon Lands stretch for fourteen miles along the coast. During PG&E's tenure, the lands have been managed for grazing, agriculture, erosion and weed control, reduction of fire hazards, public access (on the Pecho Coast and Point Buchon trails), and for the protection of ecological, scenic, and cultural resources, including endangered species.

Over the years, PG&E and its consultants have conducted numerous biological studies and surveys of the Diablo Canyon Lands. These studies, which describe the relatively undisturbed grasslands, coastal bluffs and terraces, coastal sage scrub, oak woodlands, and bishop pine forests, have revealed the diverse and largely undisturbed collection of natural resources. Sensitive species on the Diablo Canyon Lands are present and include several federally threatened species such as the California red-legged frog and the South-Central California coast steelhead trout. Fields of native coastal prairie grasslands such as purple needle grass and fescue create habitat for several species of special concern such as western burrowing owls, San Diego desert woodrat, and American badgers. The California Native Plant Society has documented many sensitive plants that are ranked as either rare or on a watch list under their rare plant ranking system. A sensitive resource study was conducted on the lands in 1996, and is attached as Appendix C.

PG&E has also engaged in extensive study of the Diablo Coast, including the intertidal zone and the areas adjacent to the utility's marina and the plant's once-through cooling intake and discharge areas. These studies have revealed the presence of a rich marine environment and unusually biodiverse and intact tide pools. For more information about the coastal and marine resources of

the Diablo Coast, please visit: <a href="https://diablocanyonpanel.org/wp-content/uploads/2020/12/10-28-20-Meeting-Transcript.pdf">https://diablocanyonpanel.org/wp-content/uploads/2020/12/10-28-20-Meeting-Transcript.pdf</a>

The Diablo Canyon Lands were ranked as a highest priority target for conservation by The Nature Conservancy in its 2000 report "Conserving the Landscapes of San Luis Obispo County." The lands (contained within the "Irish Hills" planning area) were so identified due to their outstanding natural and scenic resources; the fact that the area is large and sufficiently unfragmented to sustain the ecological resources over time; and the potential threat from unfettered residential and commercial development along this highly scenic stretch of the Central Coast (see Appendix D).

The conservation of the Diablo Canyon Lands is consistent with the Governor's Executive Order N-82-20, finding that "California's rich biodiversity is increasingly threatened by loss of habitat, spread of invasive species, decreasing water supplies, and increasingly frequent and severe climate impacts," and declaring that "it is the goal of the State to conserve at least 30 percent of California's land and coastal waters by 2030." And, further, "To advance efforts to conserve biodiversity, the California Natural Resources Agency is directed to...strategically prioritize investments in cooperative, high-priority actions that promote biodiversity protection, habitat restoration, wildfire-resilient, sustainably managed landscapes and other conservation outcomes."

#### **Cultural Resources**

In addition to their ecological and scenic resources, the Diablo Canyon Lands also contain highly significant and sacred cultural resources, including historic village sites, cultural landscapes, cultural material, cemeteries, and artifacts. The Diablo Canyon Lands are part of the ancestral homelands of the Northern Chumash, documented at over 10,000 years.

PG&E, its consultants, and others have made extensive studies of the cultural resources of the Diablo Canyon Lands, although most of that documentation is not public, in order to protect the resources from disturbance and degradation. It is also likely that unidentified cultural resources and places exist on the Diablo Canyon Lands. In the last few years, yak tityu tityu yak tiłhini Northern Chumash Tribe of San Luis Obispo County (ytt) in partnership with PG&E and Cal Poly have worked to preserve the ytt village site of tstyiwi on the Pecho Coast of the Diablo Canyon Lands (see Appendix E).

## Modern History of the Diablo Canyon Lands

Through a series of land acquisitions beginning in the 1960s, the Diablo Canyon Lands were acquired by PG&E and Eureka Energy, to serve as the location for and buffer lands around the nuclear operations of the Diablo Canyon Power Plant, which went online in the mid-1980s. The power plant has operated continuously since then.

#### DREAM Initiative - Voter Support for Conservation of the Diablo Canyon Lands

In 2000, over 75 percent of the voters of San Luis Obispo County approved the DREAM (Diablo Resources Advisory Measure) Initiative. DREAM was an advisory ballot measure that called on county leaders and PG&E to set aside the Diablo Canyon Lands for habitat preservation, agriculture, and public use upon closure of the plant. The initiative was unanimously supported by the San Luis Obispo County Board of Supervisors, PG&E, and numerous community and environmental organizations. (For more information about the DREAM Initiative, see Appendix F.)

In 2016, PG&E announced plans to close the DCPP, and in 2018 those plans were approved by the California Public Utilities Commission. PG&E suspended its application before the Nuclear Regulatory Commission for an extension of its operating licenses and the plant will cease operation and close by 2025. Decommissioning activities will continue for a decade or more after closure.

#### **Diablo Canyon Decommissioning Engagement Panel**

In 2018, PG&E formed the Diablo Canyon Decommissioning Engagement Panel (Engagement Panel), a group to serve as liaison between PG&E and the communities affected by the plant's closure. (For more information about the Engagement Panel, visit: <a href="https://www.diablocanyonpanel.org">www.diablocanyonpanel.org</a>)

Between 2018 and the present, the Engagement Panel held multiple public workshops and meetings regarding the Diablo Canyon Lands and their future. Hundreds of community residents and others attended those events, and thousands of public comments were received. The input and community sentiment were reflected in the Engagement Panel's Strategic Vision, which contains the following recommendations regarding the Diablo Canyon Lands:

- The 12,000 acres of Diablo Canyon Lands surrounding the DCPP are a precious treasure and a spectacular natural resource that should be preserved in perpetuity for the public and future generations, in acknowledgement of the significant resource values.
- The public should be ensured access to the Diablo Canyon Lands to the greatest extent possible, while protecting and preserving sensitive habitats, cultural sites and other resources.
- The use of the Diablo Canyon Lands should include activities that are consistent with wildlife and resource protection and visitor enjoyment including multi-use trails for hiking, mountain biking, equestrian use and managed overnight camping.
- The preservation of sacred Native American sites should be assured.
- The request for land ownership by the local Native American community should be acknowledged and considered as a valid claim for historical reasons, while bearing

in mind the overwhelming public testimony that the Diablo Canyon Lands be conserved and available to the public for managed use.

- The long-term protection of ecological, scenic, and cultural resources and the wellbeing of local communities should be a primary consideration in determining the appropriate level of public access to the Diablo Canyon Lands.
- The establishment of at least two multi-use trail extensions of the California Coastal Trail should be pursued which include both a trail along the coast and an interior trail through Wild Cherry Canyon and other protected Irish Hills properties.
- The coastal section of the Diablo Canyon Lands should be protected to a higher degree, as needed to ensure the conservation of the more fragile marine, tidal, and coastal environment.
- The interior sections of the Diablo Canyon Lands (including the lands associated with transmission lines) should allow for multiple compatible uses, including hiking, mountain biking, and equestrian use, and connections to the Irish Hills and Montana de Oro trail systems.
- The use of Diablo Canyon Lands for motorized vehicles (other than in parking areas, access roads and for maintenance and management activities) and night-time recreational use (other than camping as may be allowed) should be prohibited as inconsistent with resource protection.
- The use of Diablo of Diablo Canyon Lands for camping should be permitted only to the extent it is consistent with the safety of the community and the protection of cultural and environmental resources.
- The importance and legacy of the Native American community to the Diablo Canyon Lands, including methods to provide acquisition or access to those lands should be explored.
- The preservation of cultural and archeological sites and artifacts, including burial grounds should be ensured.
- The transfer, by easement or fee title, of a portion of the Diablo Canyon Lands for exclusive use by the Native American community should be considered, with protection by conservation easement or other such means that would allow limited development consistent with local zoning and the preservation of environmental and cultural resources in perpetuity.

www.diablocanyonpanel.org/panel-reports/strategic-vision-report/

#### **Tribal Lands Transfer Policy**

In 2019, the California Public Utilities Commission (CPUC) passed the landmark Tribal Lands Transfer Policy. The purpose of the Policy is to protect sacred places and cultural resources and to ensure meaningful consideration of tribal interests and the return of lands within a tribe's ancestral territory to the appropriate tribe. (For more information about the CPUC's Tribal Lands Transfer Policy, visit: www.cpuc.ca.gov/tribal/)

Consistent with the Tribal Lands Transfer Policy, the CPUC will encourage and facilitate transfers of real property to California Native American tribes. The Policy creates an expectation that for any future disposition of real property owned by a utility, tribes will be offered a right of first refusal to purchase the property, prior to it being put on the general market. Thus, the section of the Diablo Canyon Lands that is owned by PG&E (i.e., North Ranch) will be subject to a right of first refusal by the tribe(s) whose ancestral territory includes the Diablo Canyon Lands.

## Units of the Diablo Canyon Lands

For the purposes of this report, the 12,000-acre Diablo Canyon Lands are divided into three separate units.



#### North Ranch

North Ranch is approximately 4,600 acres. It is located directly south of Montana de Oro State Park and immediately north of Parcel P (the site of the power plant and its associated infrastructure). North Ranch contains some of the most spectacular tide pools and Northern Chumash cultural sites along this section of the California coastline. North Ranch already has managed public access via the Point Buchon Trail, a perpetual, deed-restricted area that was created as mitigation for PG&E's construction of its spent nuclear fuel storage facility. The Point Buchon Trail allows managed public access to a coastal bluff trail that extends 3.6 miles along the coast and allows 275 hikers per day, five days a week. (For more information about the Point Buchon Trail, visit: <a href="https://www.pge.com/en\_US/residential/in-your-community/local-environment/diablo-canyon-trails/point-buchon-trail.page">www.pge.com/en\_US/residential/in-your-community/local-environment/diablo-canyon-trails/point-buchon-trail.page</a>)

The North Ranch coastal terraces have been farmed and grazed since the late 1800's. Farming stopped in the mid-1980s, but a rotational grazing program continues. North Ranch is owned by PG&E and thus is subject to the CPUC Tribal Land Transfer Policy.



North Ranch, Diablo Canyon Lands

#### South Ranch

South Ranch is approximately 5,000 acres and is located directly south of Parcel P. This land is characterized by a broad and undeveloped coastal terrace extending to the foothills of the Irish Hills. It contains rich cultural resources including numerous historical village sites of the Northern Chumash. Public access to the South Ranch is limited to the Pecho Coast Trail, which is available by reservation only; docent-led hikes are offered a few days a week for limited group sizes to the Point San Luis Lighthouse (3.75 miles roundtrip) and to Rattlesnake Canyon (8 miles roundtrip). (For more information about the Pecho Coast Trail, visit: <a href="www.pge.com/en\_US/residential/in-your-community/local-environment/diablo-canyon-trails/pecho-coast-trail.page">www.pge.com/en\_US/residential/in-your-community/local-environment/diablo-canyon-trails/pecho-coast-trail.page</a>)

South Ranch coastal terraces were farmed until the 2010 and rotational grazing continues. The southwestern most portion of South Ranch contains 1,200 acres that are permanently deed restricted to prevent development. This restriction was required as mitigation for PG&E's replacement of the steam generator for the power plant. South Ranch is owned by Eureka Energy and thus is not subject to the CPUC Tribal Land Transfer Policy.



South Ranch, Diablo Canyon Lands

#### **Wild Cherry Canyon**

Wild Cherry Canyon is approximately 2,400 acres and is adjacent to South Ranch, to the southeast. It has been the focus of multiple (and as of yet unsuccessful) conservation attempts over the years by The Nature Conservancy and the American Land Conservancy. These efforts were previously known as the Avila Ranch Project (see Appendix G). Wild Cherry Canyon is owned by Eureka Energy and thus is not subject to the CPUC Tribal Land Transfer Policy.

Wild Cherry Canyon is currently subject to litigation between Eureka Energy (which contends it has full ownership and use of the land) and various partnerships (which contend they have valid, long-term leases over the land that give them control over the property for decades to come). The outcome of the litigation will determine the opportunity for conservation and identify the parties with whom any potential purchasers would negotiate.



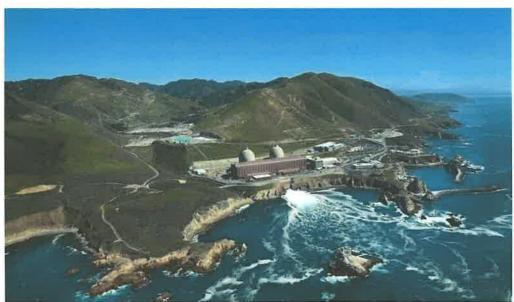
Wild Cherry Canyon, Diablo Canyon Lands

#### Parcel P

The other major land component associated with the Diablo Canyon Lands is known as Parcel P, which is owned by Eureka Energy. It is the approximately 600-acre area where the Diablo Canyon Power Plant and other facilities/structures are located, including the reactors, spent nuclear fuel cooling pools, and the spent nuclear fuel dry cask storage site. Parcel P is also the location of the Diablo Canyon marina, breakwaters, and nearby intake and discharge coves and structures.

A local economic development group, REACH, is collaborating with community organizations and individuals on the potential repurposing of the non-contaminated structures and facilities on Parcel P in an effort to boost the local economy and produce head-of-household jobs in light of Diablo Canyon's closure.

The future of Parcel P is a complex and challenging set of issues that is beyond the scope of this report. For more information about this process, visit: <a href="www.pge.com/en\_US/safety/how-the-system-works/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-repurposing.page">www.pge.com/en\_US/safety/how-the-system-works/diablo-canyon-power-plant/diablo-canyon-power-plant/diablo-repurposing.page</a>; for information about REACH, visit www.reachcentralcoast.org



Parcel P, Diablo Canyon Lands (including breakwaters)

#### Conservation Framework for the Diablo Canyon Lands

Based upon the community's input as reflected in the Diablo Canyon Decommissioning Engagement Panel's public process and resulting Strategic Vision document; the overwhelming popular vote of San Luis Obispo County residents in support of the 2000 DREAM Initiative; the Tribal Lands Transfer Policy; and the work of the Friends of the Diablo Canyon, we adopt the following framework for the conservation of the Diablo Canyon Lands:

#### **Mutual Goals**

- The ecological, scenic, and other natural resources of the Diablo Canyon Lands should be protected in perpetuity;
- The cultural resources of the Diablo Canyon Lands -- including burial sites, cultural artifacts, historic Northern Chumash village sites, and other sacred areas -- should be protected and preserved in perpetuity;
- A Diablo Canyon Lands managed public access program should be created to provide sustainable public access to both coastal and interior areas; and
- The ownership of the Diablo Canyon Lands should be transferred away from PG&E and Eureka Energy, to an appropriate entity or entities that can ensure the long-term conservation of and managed public access to the lands.

#### **Key Elements/Recommendations**

- 1. Transfer ownership and management of the Diablo Canyon Lands to an entity or entities (including possibly federal, state, tribal, local, or non-profit organization) in a manner that is consistent with the DREAM Initiative, the Strategic Vision of the Diablo Canyon Lands Decommissioning Engagement Panel, and the Tribal Land Transfer Policy;
- 2. Transfer ownership and management of the Diablo Canyon Lands to an entity or entities that demonstrate(s) the ability to satisfy the following:
  - (a) Raise adequate funds to initially purchase the land interests;
  - (b) Establish an adequate endowment or otherwise demonstrate the ability to perpetually maintain and manage the resources and public access program;

- (c) Create and record perpetual conservation easements over the entire Diablo Canyon Lands, per Key Element 3 below, at the time of transfer of ownership; and
- (d) Create a perpetual, sustainable, and appropriately sited, managed public access and use plan, per Key Element 4 below.
- 3. Create and record a conservation easement over all Diablo Canyon Lands (regardless of ownership or management) to accomplish the following:
  - (a) ensure protection of ecological, scenic, cultural, and other natural resources;
  - (b) prohibit commercial development (see Appendix H);
  - (c) prohibit other development except for limited development necessary to achieve specified conservation goals in non-resource-sensitive areas or uses that do not undermine the conservation values of the land;
  - (d) prohibit unmanaged public access; and
  - (e) prohibit non-sustainable grazing or other non-sustainable agricultural activities.

The conservation easement shall be held and managed in-perpetuity by a qualified governmental or non-profit entity that satisfies the following: (1) its mission is compatible with the long-term conservation of and managed public access to the Diablo Canyon Lands, and (2) it demonstrates the ability to perpetually monitor and enforce the terms of the conservation easement(s) through an endowment or other reliable and long-term funding mechanism.

- 4. Create a perpetual, sustainable, and appropriately sited, managed public access and use plan, to include the following:
  - (a) a managed public access program for multiple users/uses on Wild Cherry Canyon, including public access (but very restricted vehicle access) for hiking, mountain biking, equestrian use, limited leashed-dog activity, and appropriately sited, low user cost/low impact overnight camping; and
  - (b) a public, non-motorized trail system throughout the Diablo Canyon Lands, including:
    - (i) a primary coastal (and where appropriate, bluff) hiking trail from Wild Cherry Canyon through South Ranch and North Ranch to Montana de Oro, and connecting the Point Buchon and Pecho Coast trails;

- (ii) a primary interior trail for hiking, mountain biking, and equestrians from Wild Cherry Canyon to Montana de Oro, via protected properties within the Irish Hills;
- (iii) possible secondary trails to connect the two primary trails with potential access by mountain bikers and equestrians to areas on or near the coastal trail, and for multiple uses/users on Wild Cherry Canyon; and
- (c) In all cases, the trail systems shall be carefully sited, designed, and constructed in coordination with tribal representatives and cultural, biological, and other experts to avoid sensitive ecological, scenic, and cultural resources and to balance the experience of public users with the in-perpetuity conservation of the land.

## Next Steps and Strategies

#### Adoption of the Conservation Framework

As noted above, the **short-term goal** in preparing this report is to have the recommendations (and specifically the Conservation Framework contained herein) included in the 2021 Nuclear Decommissioning Cost Triennial Proceeding (NDCTP). The first step will be achieved by the submission of and advocacy for this report to PG&E, the California Public Utilities Commission, key agencies engaged in the decommissioning process (including the County of San Luis Obispo, the California Coastal Commission, and the State Lands Commission), key potential land acquisition funding agencies (the California Coastal Conservancy, California State Parks, the California Wildlife Conservation Board, the Land and Water Conservation Fund, etc.), and local elected officials (Congressman Salud Carbajal, State Senator John Laird, State Assemblymember Jordan Cunningham, and the San Luis Obispo County Board of Supervisors.

#### **Land Transfers**

The **long-term goal** in preparing this report is to see the recommendations of this report successfully implemented to benefit people and wildlife, for generations to come. Specifically, the transfer of ownership and management of the Diablo Canyon Land Units as recommended, along with the establishment of conservation easements covering all Diablo Canyon Lands (regardless of ownership/management) and an appropriate managed public access program. This will require coordination with and between the current land owners (PG&E and Eureka Energy); state and other funding agencies (as listed above); the potential successor land owners; the potential conservation easement holders; and key stakeholders of the community, including members of the Friends of the Diablo Canyon Lands.

## **Timing of Lands Transfers**

The transfer of lands away from PG&E and Eureka Energy will most likely need to be staged to reflect the needs of the utility and decommissioning activities. Wild Cherry Canyon could be the first to be transferred, because its use and management do not impact Diablo Canyon operations either before or after plant closure. However, any strategy to pursue the acquisition of Wild Cherry Canyon will not likely be possible until the litigation described above is resolved.

The transfer of North Ranch may be possible in the short to mid-term as it too is mostly unaffected by Diablo Canyon operations and decommissioning.

The transfer of South Ranch may be the last to occur, since Diablo Canyon's decommissioning activities (including massive numbers of trucks carrying decommissioning debris offsite) will use the primary road across South Ranch for years to come.

#### **Land Transfer Mechanisms**

There are two ways in which land transfers from PG&E or Eureka Energy might occur: (1) by purchase based on fair market value (or discounted value); or (2) as mitigation for permits that PG&E will need to decommission DCPP. Either approach, or a combination of the two, may occur with the transfer of the Diablo Canyon Lands.

Purchases based upon the fair market (or discounted) value of the land is the typical way in which land conservation occurs. For example, when American Land Conservancy attempted to purchase Wild Cherry Canyon years ago, an appraisal established the fair market value of the land at over \$21 million. Funds for that purchase were raised from the state Wildlife Conservation Board, the California Coastal Conservancy, the California Transportation Commission, San Luis Obispo County and the SLO Council of Governments, the Central Coast Water Quality Control Board, and the private Hind Foundation. (Unfortunately, the last piece to come from California State Parks was delayed and the project stalled as a result; see Appendix I under "Grants Awarded"). Other notable Central Coast conservation projects have been achieved in this manner, including Pismo Preserve (by the Land Conservancy of San Luis Obispo County), Hearst Ranch (by American Land Conservancy), Cambria Coast Ranch (by The Nature Conservancy), and Estero Bluffs (by the Trust for Public Land). This purchase model could be used for the acquisition of any component of the Diablo Canyon Lands, assuming that the significant amount of money needed to purchase the land (estimated to be as much as \$100 million total) could be raised.

The second way in which land conservation may be achieved is via mitigation for the multitude of permits that PG&E needs to decommission DCPP. There is significant precedent for conservation in this manner. For example, in exchange for permits to build its simulator/training building on Parcel P, PG&E agreed to establish and manage the South Ranch Pecho Coast trail system. As mitigation for the construction of the spent nuclear fuel dry cask storage facility, PG&E agreed to create and manage the North Ranch Point Buchon trail. Finally, as mitigation for the replacement of the DCPP steam generator, PG&E agreed to, among other things, restrict development inperpetuity on 1200 acres within South Ranch adjacent to Wild Cherry Canyon. (At one point the California Coastal Commission considered the conservation of the entire 12,000 acres of the Diablo Canyon Lands as mitigation for prior, far less significant DCPP permits!) A compelling case can be (and has been) made for future Diablo Canyon Lands conservation through mitigation associated with the decommissioning process; for details, see this article:

https://www.yumpu.com/en/document/read/62860961/slo-life-magazine-oct-nov-2019/54

### Conclusion

Ensuring the conservation of and managed public access to the Diablo Canyon Lands is a complex and challenging process that will require significant resources and a concerted and sustained effort by this community and its leadership. Nonetheless, we feel confident that we can succeed in the implementation of this Conservation Framework and can permanently protect and provide access to this unique, beautiful, and ecologically significant land, while honoring the rich legacy of the Northern Chumash.

