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September 03, 2024

Boris Sanchez
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th floor
San Francisco, CA 94102

Re: Minor Project Refinement No. 4 for the Round Mountain 500 kV Dynamic Reactive Support Project

Mr. Sanchez:

LS Power Grid California, LLC (LSPGC) is hereby requesting approval of Minor Project Refinement No. 4 (MPR-4) from the California Public Utilities Commission (CPUC) for the Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Project (Fern Road Substation or Project). Approval of MPR-4 would authorize the off-haul of surplus soil to be provided to a private property owner. All surplus soils would be from Project-related excavations within the approved Project boundary on LSPGC-owned land, such as rough grading, foundation excavations, drilled piers, etc. The private property where the soil would be provided is located directly adjacent to the Project site. Please refer to **Attachment B, MPR-4 Figure** and **Attachment C, MPR-4 Aerial Photograph** to view the Project components discussed within MPR-4.

Attachment A: MPR-4 Form
Attachment B: MPR-4 Figure
Attachment C: MPR-4 Aerial Photograph

Preconstruction Requirements and Permit/Approvals

The CPUC's approval of MPR-4 will not change the conditions set forth in the Final Initial Study/Mitigated Negative Declaration, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring Compliance and Reporting Plan pre-construction or construction requirements. Furthermore, no new permits are required for MPR-4 activities.

MPR-4 Request for Approval

LSPGC respectfully requests approval of MPR-4 to off-haul surplus soil to an adjacent property owner for their reuse by September 10, 2024. Should you have any questions or need additional information, please do not hesitate to contact me at djoseph@lspower.com.

Sincerely,

Dustin Joseph
Director of Environmental Permitting

cc: Matthew Fagundes, ESA
Maria Hensel, ESA
David Wilson, LSPGC
Mark Milburn, LSPGC
Emily Critchfield, KPE

ATTACHMENT A
MPR-4 Form



Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Fern Road Substation Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact, create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and that don't conflict with any applicable law or policy.

Date Requested: September 3, 2024

Report No.: 4

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): Excess soil would originate from within LS Power Grid California, LLC (LSPGC)-owned property and be hauled via existing unpaved access roads to an adjacent private property located to the south.

Location/Milepost: 12341 Fern Road, Whitmore CA 96096.

Land Use/Vegetative Cover: Excess soil to be removed from the active construction site which is clear of vegetation (bare ground) and delivered to adjacent private property.

Sensitive Resources: There are no new temporary or permanent work areas proposed as part of this MPR-4 request. Sensitive resources within the Fern Road Substation site remain the same as described in the Final Initial Study / Mitigated Negative Declaration (IS/MND) and previously approved MPRs, MPR-2 and MPR-3.

Modification From:

☐ Permit	☐ Plan/Procedure	☐ Specification	☐ Drawing
☐ Mitigation Measure	☒ Other:		

LSPGC is requesting approval of MPR-4 to allow the Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Project (Fern Road Substation or Project), to off-haul surplus excavated soil to an adjacent private land owner, rather than exporting the soil to a landfill for disposal. All surplus soil would be from Project-related excavations within the approved Project boundary on LSPGC-owned land, such as rough grading, foundation excavations, drilled piers, etc. The private property is located directly adjacent to the Project site (see **Attachment B, MPR-4 Figure**). It is anticipated that the surplus soil would be provided to the adjacent property owner over a period of six months (approximately 3 trips per week) using existing unpaved access roads. Stockpiles within the Project site would be managed in compliance with requirements within Applicant Proposed Measure (APM) WQ-1 and the Project's Stormwater Pollution Protection Plan (SWPPP).

Describe how project refinement deviates from current project. Include photos.

Original Condition: Soil being off-hauled comes from within the approved Project site and is therefore within the geographic study area of the Final IS/MND. Excess soil from excavations were always anticipated as a result of Project construction.

Justification for Change: Section 2.5.2.2 of the Final IS/MND discusses how excavated soil and cut material would either be used on-site to balance cut and fill calculations, hauled off-site, stockpiled, or wasted. It is anticipated that approximately three loads per week of surplus soil would be diverted from the landfill as the private property owner is willing to accept this soil. This action provides the benefit of reducing Project-related waste and emissions caused by hauling the surplus soil on public roads to an off-site landfill (Richard W. Curry West Landfill) approximately 33 miles from the Project site.

Maps & Figures: Refer to **Attachment B, MPR-4 Figure**, for a map showing the LSPGC property boundary in relation to the adjacent private property where the soil would be provided. Refer to **Attachment C, MPR-4 Aerial Photograph**, for an overview photo of the current Project layout, including sources for surplus soil.

Environmental Impact: The proposed MPR-4 action to off-haul surplus soil to an adjacent private property owner for their use would not change the nature or substantially increase the severity of any impacts disclosed within the Final IS/MND; would not result in alteration to APMs or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new permits or new regulatory approval. Approval of MPR-4 would not result in an increase in temporary or permanent disturbance areas and would result in the net benefit of reducing Project-related waste, traffic, and emissions related to off-hauling surplus soil. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as there is no change to the scope or schedule of the approved Project that would result in impacts that have not been previously analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>			
Biological	☐ No Resources Present	☐ Resources Present	☒ N/A, Change would not affect resources
There is no change in scope, increase in temporary or permanent disturbance area, or other change to the approved Project proposed within MPR-4 that would affect biological resources in a manner differently than disclosed within the Final IS/MND.			
Cultural	☐ No Resources Present	☐ Resources Present	☒ N/A, changes would not affect resources
There is no change in scope, increase in temporary or permanent disturbance area, or other change to the approved Project proposed within MPR-4 that would affect cultural or tribal resources in a manner differently than disclosed within the Final IS/MND.			

Paleontological	☐ No Resources Present	☐ Resources Present	☒ N/A, Change would not affect resources
There is no change in scope, increase in temporary or permanent disturbance area, or other change to the approved Project proposed within MPR-4 that would affect paleontological resources in a manner differently than disclosed within the Final IS/MND. In addition, paleontological monitors have been monitoring and will continue to monitor (at their discretion) Project excavations exceeding two feet below ground surface (bgs) in compliance with the approved Paleontological Resources Monitoring and Mitigation Plan (PRMMP) and APM PALEO-1, therefore surplus soil will have been previously inspected and determined to be free of fossils prior to being gifted.			
<u>Disturbance Acreage Changes:</u> ☐ Yes ☒ No			
There is no change in disturbance acreage proposed within MPR-4.			

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the IS/MND as it relates to MPR-4. MPR-4 would have no potential to impact the following environmental resource areas, and therefore are not included in the table below: Aesthetics, Agriculture and Forestry Resources, Biological Resources, Energy, Cultural and Tribal Resources, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise and Vibration, Population and Housing, Public Services, Recreation, Utilities and Service Systems, and Wildfire.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Air Quality	☒ Y	Approval of MPR-4 to off-haul surplus soil to an adjacent property owner would not result in new construction activities that have not previously analyzed and disclosed within the Project's Final IS/MND. There is no change to the overall construction schedule or equipment used that will result from MPR-4 and Mitigation Measure (MM) AQ-1 will continue to be implemented to document each off-road unit's certified tier specification and diesel particulate filter status. All Project activities would continue to take place in accordance with the Shasta County Standard Mitigation Measures (SMMs) defined in APM AQ-1 and Dust Control Plan measures defined in APM AQ-2. These measures include: - AQ-SMM-1: Maintain all construction equipment in proper tune according to manufacturer specifications, - AQ-SMM-2: Fuel all off-road and portable diesel-powered equipment with California Air Resources Board (CARB)-certified motor vehicle diesel fuel,
	☐ N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		• AQ-SMM-3: Use diesel construction equipment meeting ARB's Tier 2 certified engines or cleaner off-road heavy-duty diesel engines and comply with the State Off-Road Regulation. • AQ-SMM-4: Use on-road heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road heavy-duty diesel engines and comply with the State on-road regulation. • AQ-SMM-5: All on and off-road diesel equipment shall not idle for more than five minutes. • AQ-SMM-6: Diesel idling within 1,000 feet of sensitive receptors is not permitted. • AQ-SMM-7: Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. • AQ-SMM-8: Electrify equipment when feasible. • AQ-SMM-9: Substitute gasoline-powered in place of diesel-powered equipment, where feasible; and use alternatively fueled construction equipment on-site where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane or biodiesel. • Dust Control Plan measure: Use water trucks or sprinkler systems in sufficient quantities to prevent airborne dust from leaving the site, and • Dust Control Plan measure: All soil stock-pile areas should be sprayed daily as needed. Additionally, off-hauling the surplus soil to an adjacent property owner rather than hauling it to a landfill 33 or more miles away from the Project site would reduce Project-related diesel exhaust emissions. Overall, it is estimated approval of MPR-4 would reduce the number of Project-related truck trips to the landfill by 72 trips and 2,400 miles traveled. Therefore, the approval of MPR-4 would result in a net benefit compared to impacts analyzed and disclosed within the Project's Final IS/MND, Section 3.3. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y	MPR-4 would not require agency consultation relating to air quality.
	☒ N	
Greenhouse Gas Emissions	☒ Y	Approval of MPR-4 to allow the off-haul of surplus soil to an adjacent property owner would not result in new construction activities that have not previously analyzed and disclosed within the Project's Final IS/MND. There is no change to the overall construction schedule or
	☐ N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		equipment used that will result from MPR-4. APM GHG-1 will continue to be implemented to minimize greenhouse gas emissions as follows: • Construction workers shall be encouraged to carpool to the job site; • Project debris will be recycled for reuse to the extent feasible; • Line power will be used on-site instead of diesel generators where line power is available; and • Construction equipment shall be maintained per manufacturing specifications. Additionally, the off-haul of surplus soil to an adjacent property owner rather than hauling it to a landfill 33 or more miles away from the Project site would reduce Project-related carbon dioxide emissions. Overall, it is estimated approval of MPR-4 would reduce the number of Project-related truck trips to the landfill by 72 trips and 2,400 miles traveled. Therefore, the approval of MPR-4 would result in a net benefit compared to impacts analyzed and disclosed within the Project's Final IS/MND, Section 3.8. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y	MPR-4 activities would not require agency consultation relating to greenhouse gas emissions.
	☒ N	
Hazards and Hazardous Materials	☒ Y	During construction, any excavated soil that are suspected of being contaminated on the basis of visual, olfactory, or other factors, must be contained, tested and disposed of in accordance with APM HAZ-2, APM HAZ-3, and Section 2.6 of the Hazardous Materials Management Plan (HMMP). None of the excavated material on-site has been suspected of contamination, including the surplus soil that would be provided to the adjacent property owner. All construction activities will continue to be performed in accordance with APM HAZ-2 and APM HAZ-3 during MPR-4 activities, as well as APM HAZ-1 to prevent and contain leaks, drips, and spills to avoid soil contamination, and APM HAZ-4 to ensure fire safety. As described in Section 3.9.1.1 of the Final IS/MND, a Phase I environmental site assessment was conducted in 2020 for the Fern Road Substation site and surrounding areas to determine the presence or absence of
	☐ N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), and historical recognized environmental conditions (HRECs). Environmental databases maintained by federal, state, and local agencies were reviewed to identify sites that have used or use hazardous materials, including pesticides. The search also involved identifying sites with spills or releases of hazardous materials. The assessment found that there are no known activities in the vicinity of the Fern Road Substation site or at neighboring properties that would indicate significant potential for RECs; no evidence of RECs, CRECs, or HRECs exists; and the site is not listed on any of the databases reviewed. The assessment analyzed available data from 1941 onward. Prior to 1941, the Project site was native, unimproved land. Therefore, approval of MPR-4 to allow the off-haul of surplus soil to an adjacent property owner would not result in new significant impacts or a substantial increase in the severity of impacts analyzed and disclosed within the Project's Final IS/MND, Section 3.9. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y	MPR-4 activities would not require agency consultation relating to hazards or hazardous materials.
	☒ N	
Geology and Soils	☒ Y	MPR-4 does not involve new ground disturbance or grading, the installation of any new permanent facilities, nor performance of any new construction activities. Accordingly, approval of MPR-4 would not create any new geological related hazard not previously disclosed in the Project's Final IS/MND, Section 3.7. All Project-related stockpiling activities will continue to adhere to requirements in the SWPPP during MPR-4 activities, including the implementation of erosion control BMPs. Project activities will continue to comply with requirements in APM GEO-1 as applicable, however no topsoil will be provided to the property owner with the surplus soil. Paleontological monitors have been monitoring and will continue to monitor (at their discretion) Project excavations exceeding two feet bgs in compliance with the approved PRMMP and APM PALEO-1, therefore
	☐ N	

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		surplus soil will have been previously inspected and determined to be free of fossils prior to being gifted. All MPR-4 activities will be performed in compliance with APM GEO-1, APM PALEO-1, and APM PALEO-2. APM GEO-2 is not applicable to MPR-4 as there are no new structural components being proposed. Therefore, impacts to geology, soils, and paleontological resources would remain similar to those addressed within the Project's Final IS/MND, Section 3.7. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y	MPR-4 activities would not require agency consultation relating to geology, soils, or paleontological resources.
	☒ N	
Traffic and Transportation	☒ Y	There are no modifications to access roads proposed in MPR-4 and existing unpaved access roads would be utilized for off-hauling of surplus soil to the adjacent property owner. Although not anticipated for MPR-4 activities, Project activities would continue to follow the designated Traffic Control Plans in accordance with APM TRA-1 as applicable. LSPGC would continue to coordinate construction activities with local law enforcement and protection agencies as required by APM PS-1 and APM FIRE-5. The off-hauling of the surplus soil to an adjacent property owner rather than hauling it to a landfill 33 or more miles away from the Project site would reduce Project-related trips on local roadways. Overall, it is estimated approval of MPR-4 would reduce the number of Project-related truck trips to the landfill by 72 trips and 2,400 miles traveled, thereby reducing traffic congestion and potential vehicular conflicts. Therefore, approval of MPR-4 would result in a net benefit compared to impacts analyzed and disclosed within the Project's Final IS/MND, Section 3.17. No new or altered APMs or MMs would be required.
	☐ N	
Agency Consultation?	☐ Y	MPR-4 activities would not require agency consultation relating to traffic or transportation.
	☒ N	

ATTACHMENT B
MPR-4 Figure

FERN ROAD SUBSTATION

MPR-4
Figure 1

Shasta County, CA

LEGEND

Project Components

- Expanded Staging Area Previously Approved in MPR-3
- Materials Storage (No Tree Removal) Previously Approved in MPR-3
- Materials Storage within MPR-2 Work Area
- Tree Clearing Area Previously Approved in MPR-2
- Project Area Previously Approved in NTP-1

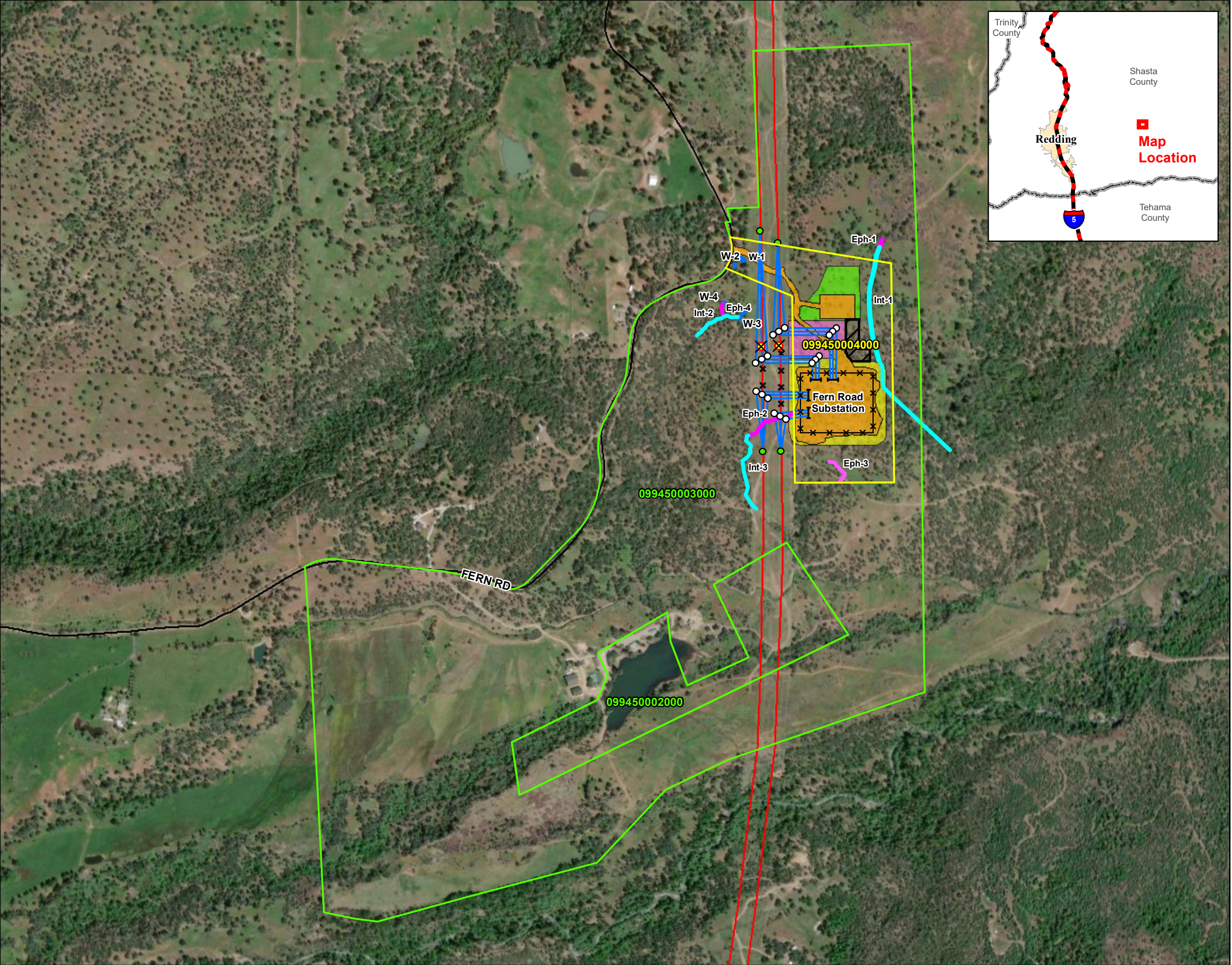
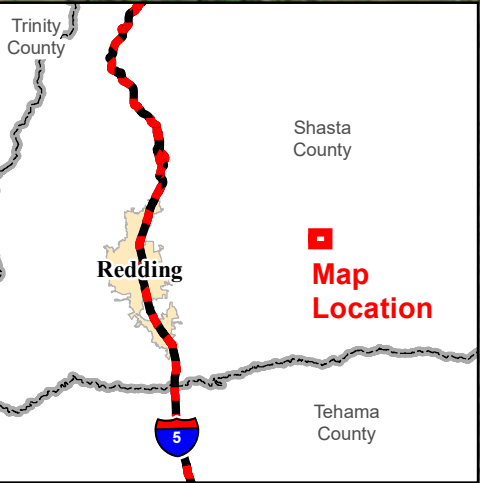
- New 3-Pole Dead-End Pole
- Existing Structure
- Existing Structure to be Removed
- Project Tie Line
- Existing 500kV Transmission Line to be Removed
- Fern Road Substation Bay
- Substation Fence

Aquatic Resources

- Eph - Ephemeral Stream
- Int - Imittent Stream
- W - Seasonal Wetland

General Features

- Interstate
- Road
- County Boundary
- Municipal Boundary
- LS Power Property
- Stronghold Ranch Properties



ATTACHMENT C
MPR-4 Aerial Photograph



Surplus soil will be provided from existing stockpiles, soil placement areas, or spoils from new excavations, such as for drilled piers.