

	California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i>
	Lassen Substation Project Compliance Status Report: 04 August 31, 2021

SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Initial Study (FIS)/Mitigated Negative Declaration (MND) for the Lassen Substation Project. The CPUC has established a third-party monitoring program and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure that measures approved in the FIS/MND to mitigate or avoid impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities on the project, a summary of site inspections conducted by the CPUC's third-party monitors, the compliance status of mitigation measures required by the MMCRP, and anticipated construction activities. Photos of site observations are included in Attachment A of this report. Summaries of the Notices to Proceed (NTP) and Minor Project Refinements (MPR) are provided in Attachments B and C, respectively.

This compliance status report covers construction activities from August 1- August 31, 2021.

CONSTRUCTION SCHEDULE AND PROGRESS

PacifiCorp began construction activities associated with NTP-1 in March 2021. All project activities are scheduled to be complete by the end of 2022.

During this reporting period, crews conducted work associated with underground and aboveground components including installation of conduit, grounding, and bus. Activities included, but were not limited to equipment delivery and offloading; setting up piers for concrete pouring and pouring concrete; moving spoils; drilling; trenching for conduit, cable trays, and ground grid and trench compaction; welding; installing conduit, insulators, and steel; and testing equipment.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor (ECM) conducted site observations in areas under active construction to verify implementation of the mitigation measures stipulated in the project's MMCRP. Observations were documented using site inspection forms, and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

Implementation Actions

During the reporting period, the CPUC ECM participated in the Worker Environmental Awareness Program (WEAP) prior to conducting site inspections per APM BIO-8. Weekly progress reports were submitted by PacifiCorp, which included documentation of WEAP training administered to all new crew members prior to conducting work on the site.

During site inspections, the ECM observed the lead Environmental Monitor (EM) on site, implementing measures intended to avoid resources to the fullest extent possible (APM BIO-6). The ECM observed that construction was limited to the project area delineated by existing fencing, and areas outside the existing disturbance footprint were avoided in accordance with APM BIO-1, BIO-3, and BIO-7. The ECM observed ramped excavation areas that allowed for wildlife ingress and egress in accordance with APM BIO-6 (see Photo 1—Attachment A). The ECM observed the site free of trash during site inspections per APM BIO-11 and trash was contained in staged receptacles.

New construction vehicles and equipment brought onsite were inspected and were determined to be free of soil build-up in accordance with APM BIO-2. Access roads appeared to be sufficiently watered by water trucks to control particulate matter emissions in accordance with APM AQ-1 and use of previously established roadways was observed (APM BIO-10) (see Photo 2—Attachment A). While dust was not observed by the ECMs, PacifiCorp reported a need to repair or replace the vehicle used for water application in order to maintain compliance with dust control measures; the vehicle was reported to be repaired on 8/16/21.

Erosion control best management practices (BMPs), such as fiber rolls were observed to be in good condition in accordance with the locations identified in the project's SWPPP (APM WQ-1) (see Photo 3—Attachment A) and topsoil piles were observed stabilized in accordance with the SWPPP. During a site inspection, the ECM observed that the integrity of the concrete washout liner was compromised and discussed it with the onsite EM (see Photo 4—Attachment A). The EM confirmed the liner had been damaged the previous day and because concrete work had concluded, once the concrete dried, the crews would remove the solidified concrete and re-line the washout area prior to use.

During site inspections, the EM reported monitoring containment/fueling and secondary containment areas and noted procedures followed in accordance with APMs HAZ-2 and HAZ-3. Small spills noted on site by the EM were immediately contained and cleaned up in conformance with APM HAZ-3, however during times of inspection, the ECM did not observe spills. The EM monitored placement of materials and equipment to ensure compliance in accordance with AMPs HAZ-2 and HAZ-3.

Per the Fire Plan for the project (MM HAZ-2) fire suppression tools, including extinguishers, Pulaski's, and 5-gallon pumps were observed staged on site in accordance with MM HAZ-2. Vehicles were observed parked on previously disturbed areas in accordance with the Fire Plan (See Photo 5—Attachment A).

Mitigation Measure Tracking

Mitigation measures applicable to the construction activities were verified in the field and documented in the CPUC's mitigation measure tracking table. A complete list of mitigation measures and applicant proposed measures is included in the FIS/MND in the Decision, as adopted by the CPUC on May 16, 2018 (Decision 18-05-014) and the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP).

Compliance Status

No non-compliance events were observed or reported during this reporting period. PacifiCorp reported the following corrective actions performed on site:

- Stained soils from equipment leaks were found on site, were cleaned, and were disposed of in accordance with project requirements. Secondary containment was implemented and verified. Leaking equipment was repaired.
- Upon inspection, the EM observed improper covering of some excavated areas and communicated with site personnel to ensure all site personnel understood project requirements for covering open areas in relation to wildlife entrapment.

CONSTRUCTION SCHEDULE AND PROGRESS

PacifiCorp began construction activities associated with NTP-1 in March 2021. All project activities are scheduled to be complete by 2022. As of the end of August 2021, the status of the following project components were as follows:

PROJECT COMPONENTS	PERCENT COMPLETE
<i>Substation Construction</i>	
Lead/Asbestos Removal on Existing Structures	100%
Demolition of Existing Structures	100%
Tree Removal	100%

PROJECT COMPONENTS	PERCENT COMPLETE
Excavation	95%
Foundation Installation	100%
Backfill	100%
Conduit installation	80%
Ground Grid Installation	85%
Fencing Installation	100%
Surfacing Material Installation	0%
Structure Erection	35%
Equipment Installation	50%
Bus Installation	15%
Low Voltage Wiring	0%
Testing & Commissioning	0%
<i>Boring under 1-5</i>	
Site preparation	0%
Boring	0%

ATTACHMENT A Photos



Photo 1: Excavated areas were ramped to prevent entrapment (APM BIO-6).



Photo 2: A water buffalo was observed on site and has been actively wetting roads and unpacked construction areas, in compliance with SWPPP and dust (APM AQ-1).

ATTACHMENT A (Continued)



Photo 3: SWPPP erosion control BMPs (fiber rolls) were observed in good condition along the project boundary in accordance with APM WQ-1.



Photo 4: Concrete washout (SWPPP) liner was observed damaged and scheduled for repair.

ATTACHMENT A (Continued)



Photo 5: Vehicles were observed being parked in previously disturbed areas in accordance with the project's Fire Plan (MM HAZ-2).

ATTACHMENT B Notices to Proceed

NTP No.	Date Issued	Description	Conditions Included (Y/N)
CPUC - 001	March 1,2021	Construction activities associated with NTP-1 (New Substation and I-5 Boring)	Y

ATTACHMENT C

Minor Project Refinement Request

Minor Project Refinement Request No.	Submitted	Description	Status	Approval
None submitted to date				