

DOCKETED

Docket Number:	06-AFC-09C
Project Title:	Colusa Generating Station - Compliance
TN #:	259773
Document Title:	STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE - GRAVEL REPLACEMENT
Description:	STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE - GRAVEL REPLACEMENT
Filer:	Anwar Ali
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	10/30/2024 10:52:16 AM
Docketed Date:	10/30/2024



STATEMENT OF STAFF APPROVAL OF POST CERTIFICATION CHANGE COLUSA GENERATING STATION (06-AFC-09C)

On June 4, 2024, the Pacific Gas and Electric Company (PG&E) filed a Post-Certification Petition for Changes in Project Design, Operation or Performance and Amendments to the Commission Decision (Petition) ([TN 258231](#)) with the California Energy Commission (CEC) requesting to amend the Colusa Generating Station (CGS) Final Commission Decision (Decision) pursuant to California Code of Regulations, title 20, section 1769.

The CGS, a 660-megawatt combined cycle natural gas-fired facility, was certified by the CEC in April 2008 and began commercial operation in December 2010. The facility is located in the unincorporated community of Maxwell, Colusa County.

DESCRIPTION OF PROPOSED CHANGE

PG&E is seeking CEC's approval to replace the onsite gravel with asphalt pavement. The proposed action entails replacement of approximately 13,000 square feet (approximately 0.3 acres) of the existing gravel, within the CGS power block, with pervious asphalt pavement to facilitate maintenance activities. The replacement of the gravel with asphalt will improve equipment access in the area and mitigate trip and slip hazards on the uneven surface of the gravel. Additionally, the change to asphalt will reduce negative human-rattle snake interactions as the rattle snakes regularly encountered onsite will be more visible on the asphalt versus blending in easily with the existing gravel.

For additional information, go to the CEC's project webpage (<https://www.energy.ca.gov/powerplant/combined-cycle/colusa-generating-station>). In the box labeled "Compliance Proceeding," click on the "Docket Log" to access documents for this Proceeding.

CEC STAFF REVIEW AND CONCLUSIONS

California Code of Regulations, title 20, section 1769(a)(1) requires a project owner to petition the CEC for the approval of any change the project owner

proposes to the project design, operation, or performance requirements of a certified facility. Pursuant to 1769(a)(3)(A), the petition may be approved by CEC staff (staff) only if the following criteria are met:

- i. There is no possibility that the change may have a significant impact on the environment, or the change is exempt from the California Environmental Quality Act;
- ii. The changes would not cause the project to fail to comply with any applicable laws, ordinances, regulations, or standards (LORS); and
- iii. The changes will not require a change to, or deletion of, a condition of certification adopted by the Commission in the Decision or subsequent amendments.

Staff reviewed the petition for potential environmental effects and consistency with LORS. Staff's conclusions for all technical and environmental areas are summarized in **Table 1**.

TABLE 1
Summary of Conclusions for all Technical and Environmental Areas

Technical Areas Reviewed	CEQA				Conforms with applicable LORS
	Potentially Significant Impact	Less Than Significant Impact with Mitigation (with Revised or New COCs)	Less Than Significant Impact (with or without Existing COCs)	No Impact	
Air Quality			X		X
Biological Resources				X	X
Cultural Resources			X		X
Efficiency				X	
Facility Design					X
Geological Resources				X	X
Hazardous Materials Management			X		X
Land Use				X	X
Noise and Vibration			X		X
Paleontological Resources				X	X
Public Health			X		X
Reliability					
Socioeconomics			X		
Soil and Water Resources			X		X
Traffic and Transportation				X	X
Transmission Line Safety and Nuisance				X	X
Transmission System Engineering					X
Visual Resources			X		X
Waste Management			X		X
Worker Safety and Fire Protection			X		X

Areas shown in gray are not subject to CEQA consideration or have no applicable LORS the project must comply with.

Staff has determined that the modified project would continue to comply with applicable LORS, and the project change would not result in any significant adverse environmental impacts or require a change to any conditions of certification (COCs). The bases for each of staff's conclusions are provided below:

AIR QUALITY

Air Quality criteria pollutant impacts associated with the removal of the existing gravel and the installation of the new base and asphalt would be less than significant. The construction period would be short-term (3-months) and emissions of NO_x, PM₁₀, PM_{2.5}, and CO₂ generated by the proposed project change are expected to be less than the applicable thresholds of significance for the project location. As a result, the proposed project changes at the CGS site are not expected to have a significant impact on air quality or Greenhouse Gases (GHGs) and would not require additional mitigation beyond the mitigation requirements already included in the Conditions of Certification **AQ-SC1** through **AQ-SC5**. The project would continue to comply with the Decision and the COCs. Implementation of the Conditions of Certification **AQ-SC1** through **AQ-SC5** would minimize construction impacts to a less than significant level. The project would remain in compliance with all LORS related to air quality.

BIOLOGICAL RESOURCES

The proposed project modifications would occur in previously disturbed and developed areas used for current facility operations. The proposed modifications would not alter the physical appearance of the facility, or require offsite staging, or laydown and heavy haul deliveries. No habitat or vegetation would be disturbed. Therefore, the proposed project modifications would not affect biological resources or require any changes to the existing biological resources COCs.

CULTURAL RESOURCES

The proposed change does not affect cultural and tribal cultural resources, as described in the Decision. The proposed change would occur completely within the project site and would not disturb intact native soils. Therefore, no impacts to cultural or tribal cultural resources are expected. The proposed modification would not create a significant cultural or tribal cultural resource impact and would not require additional COCs. The proposed modification does not require changes to the COCs for cultural and tribal cultural resources. With implementation of **CUL-1**, **CUL-3**, **CUL-5**, and **CUL-7** (and **CUL-2**, if needed), any impacts that might result to cultural or tribal cultural resources would be reduced to a less-than-significant level. The project would remain in compliance with all applicable LORS related to cultural and tribal cultural resources.

EFFICIENCY

The removal of the existing gravel and the installation of the new base and asphalt would not affect the power plant's thermal efficiency. No LORS apply to the power plant efficiency.

FACILITY DESIGN

Installation of the new base and asphalt must be in accordance with the edition of the California Building Code in effect at the time initial design plans are submitted to the CEC's delegate chief building official (DCBO) for review and approval. Implementation of the existing Facility Design COCs adopted in the Decision and construction compliance oversight by the DCBO would ensure this compliance.

GEOLOGICAL AND PALEONTOLOGICAL RESOURCES

The proposed project modifications involve a limited area (0.3 acres) and are not expected to disturb native soil; therefore, geological and paleontological resources would not be impacted. The project would conform with applicable LORS related to the geological and paleontological resources and no changes to the existing COCs would be required.

HAZARDOUS MATERIALS MANAGEMENT

The proposed project modifications would not involve extremely hazardous materials. Hazardous materials such as gasoline, solvents, lubricants, paints, and welding gases would be used in minimal quantities, posing no significant risk to workers or the offsite public. Hazardous materials would be stored, handled, and used in accordance with applicable LORS. Therefore, the proposed replacement of gravel with asphalt would not significantly impact the project's hazardous materials management and conforms with applicable LORS.

LAND USE

The proposed project modifications would occur in previously disturbed and developed areas used for current facility operations. The proposed modifications would not alter the physical appearance of the facility and would not include new activities or an increase in existing activities that were previously analyzed in the Decision. The project would remain in conformance with applicable LORS related to land use. There are no land use COCs in the Decision applicable to the proposed change. The proposed change would not physically divide an established community or cause a significant environmental impact due to a conflict with LORS adopted for the purpose of avoiding or mitigating an environmental effect. Further, the change would not result in the conversion of farmland or forest land or conflicts with agricultural operations.

Therefore, the replacement of gravel with pervious asphalt would have no impacts to land use.

NOISE AND VIBRATION

The proposed project modifications would not increase noise at nearby residences. The operational noise would not be affected as a result of the proposed changes. Furthermore, the project would continue to meet operational noise requirements established in the Decision. Any noise generated during the removal of the existing gravel and the installation of the new base and asphalt would be temporary, intermittent, and consistent with the local General Plans (The Safety Element of the Colusa County General Plan, and Glenn County General Plan) as well as the local Municipal Code [Colusa County Section 8.01 (a)]. With implementation of the existing Noise COCs in the Decision, the proposed modifications would result in less than significant impacts and comply with the applicable noise-related LORS

PUBLIC HEALTH

Public Health impacts associated with the removal of the existing gravel and the installation of the new base and asphalt would result in less than significant impacts. Construction would be short-term (3-months). The proposed modifications do not require changes to the COCs for Public Health. Implementation of **AQ-SC1** through **AQ-SC5** would minimize construction impacts to a less than significant level. The project would remain in compliance with all LORS related to public health.

RELIABILITY

The proposed modifications would not affect the power plant's overall reliability.

SOCIOECONOMICS

The gravel replacement is expected to take three months to complete by approximately two workers. The installation of the new permeable asphalt would not require any changes in operational workforce at the CGS. There are no socioeconomics-related LORS or COCs in the Decision applicable to the proposed changes. There would be less than significant temporary workforce-related impacts on population, housing, and public services.

SOIL AND WATER

The proposed modifications would occur during the dry season between April and October 2025. The proposed activities are expected to impact soil or water resources as they would involve excavation. Permeable asphalt will function similarly to the gravel it is replacing and no operational impacts beyond those analyzed by the CEC in the original license are expected. Since the storm water will be directed to the existing

storm water detention basin, the project owner is required to implement the Best Management Practices, including silt fencing, straw wattles, and silt barriers (as applicable) around existing storm drains consistent with Condition of Certification **SOIL&WATER-2** and the approved Drainage, Erosion, and Sedimentation Control Plan (DESCP). Implementation of **SOIL&WATER-2** and the DESCP would ensure that impacts to soil and water resources are less than significant. The construction activities are expected to comply with applicable LORS and the proposed modifications would not require changes to the existing COCs or new COCs for soil and water resources.

TRAFFIC AND TRANSPORTATION

The gravel replacement project is expected to take three months to complete. The modifications would require an excavator, bobcat, dump truck, a roller, and a paving machine with approximately two workers to remove the gravel, place the aggregate, compact the aggregate, and install the pervious asphalt. Two trucks driven by the same two workers would also be used to move the existing gravel within the existing CGS fence line and it is anticipated that three daily truck trips during construction would be used to deliver the aggregate to the site. The new permeable asphalt would not require any changes in operational workforce at the CGS. Therefore, the few temporary workers and truck trips in the rural project area lacking traffic congestion would result in less than significant impacts to transportation. No other permits are anticipated for this project. However, if a ministerial permit is needed, such as a Caltrans single-trip transportation permit to transport oversized or excessive loads over state highways, it would be obtained prior to transport of the equipment or materials. There are no COCs in the Decision applicable to the proposed modifications and the project would continue to conform with applicable LORS.

TRANSMISSION LINE SAFETY AND NUISANCE

There would be no impacts to the Transmission Line Safety and Nuisance due to the removal of the existing gravel and the installation of the new base and asphalt. The proposed project modifications are not expected to disturb any transmission lines associated with the project. Implementation of the existing COCs adopted in the Decision would ensure continued compliance with LORS.

TRANSMISSION SYSTEM ENGINEERING

There would be no impacts to the Transmission System Engineering due to the removal of the existing gravel and the installation of the new base and asphalt. The proposed project modifications are not expected to disturb any transmission lines associated within the project. Implementation of the existing COCs adopted in the Decision would ensure continued compliance with LORS.

VISUAL RESOURCES

The gravel replacement is expected to take three months to complete, and all work would occur within the existing CGS fence line. Movement and spread of the gravel throughout the site and installing approximately 0.3 acres of permeable pavement would not alter the appearance of the CGS facility as perceived by public or result in any impacts to scenic resources or visual resources. There are no COCs in the Decision applicable to the proposed modifications and the project would continue to conform with LORS.

WASTE MANAGEMENT

The proposed modifications would involve a limited area (0.3 acres) and are not expected to disturb native soil. The proposed modifications would produce minimal waste and would adhere to the operation waste management plan as outlined in the Condition of Certification **WASTE-5**. The project would conform with applicable LORS related to waste management and no changes to the existing COCs would be required.

WORKER SAFETY AND FIRE PROTECTION

During the proposed gravel replacement, continued compliance with Condition of Certification **WORKER SAFETY-1** would ensure the project's adherence to applicable LORS. Therefore, the proposed modifications would not significantly impact the health and safety of the workers or the general public.

CALENVIROSCREEN 4.0

Staff reviewed CalEnviroScreen 4.0 data to determine whether the United States census tract where the Colusa Generating Station is located (06011000400) is identified as a disadvantaged community. This science-based mapping tool is used by the California Environmental Protection Agency (CalEPA) to identify disadvantaged communities based on geographic, socioeconomic, public health, and environmental hazard criteria pursuant to Health and Safety Code section 39711 as enacted by Senate Bill 535 (De León, Chapter 830, Statutes of 2012). The CalEnviroScreen 4.0 overall percentile score for this census tract is 33.8 and, thus, is not identified as a disadvantaged community¹.

ENVIRONMENTAL JUSTICE

Environmental Justice Figure 1 shows 2020 census blocks in the six-mile radius of the Colusa Generating Station with a minority population greater than or equal to 50 percent. The population in these census blocks represents an environmental justice (EJ) population based on race and ethnicity as defined in the United States Environmental Protection Agency's *Guidance on Considering Environmental Justice During the*

Development of Regulatory Actions. Staff conservatively obtains demographic data within a six-mile radius around a project site based on the parameters for dispersion modeling used in staff’s air quality analysis. Air quality impacts are generally the type of project impacts that extend the furthest from a project site. Beyond a six-mile radius, air emissions have either settled out of the air column or mixed with surrounding air to the extent the potential impacts are less than significant. The area of potential impacts would not extend this far from the project site for most other technical areas included in staff’s EJ analysis.

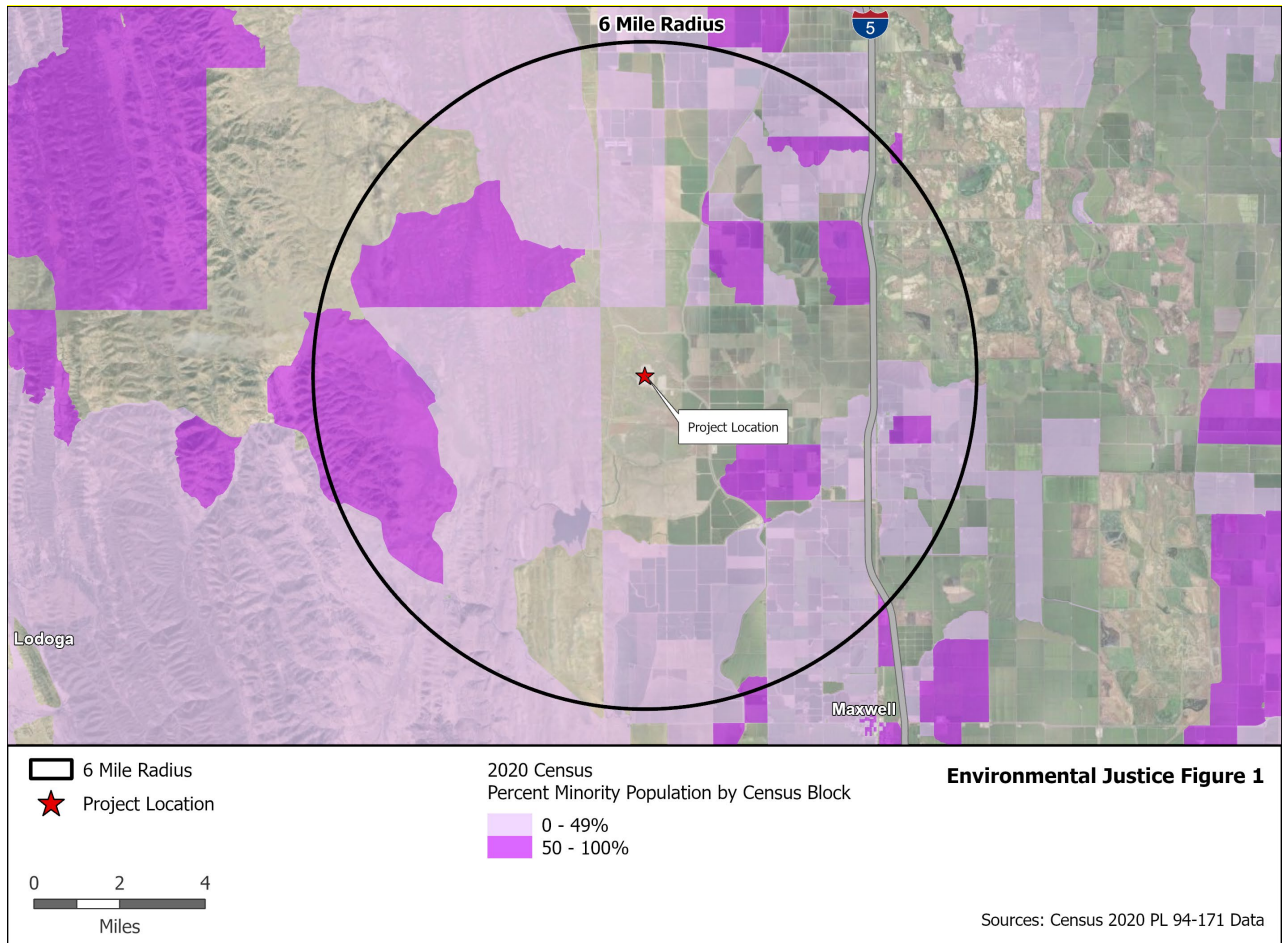
Based on California Department of Education data in the **Environmental Justice Table 1**, staff concluded that the percentage of those living in the Willows Unified School District (in a six-mile radius of the project site) and enrolled in the free or reduced price meal program is greater than those in the reference geography. Thus, it is considered an EJ population based on low income as defined in *Guidance on Considering Environmental Justice During the Development of Regulatory Actions*. **Environmental Justice – Figure 2** shows where the boundaries of the school district are in relation to the six-mile radius around the Colusa Generating Station site.

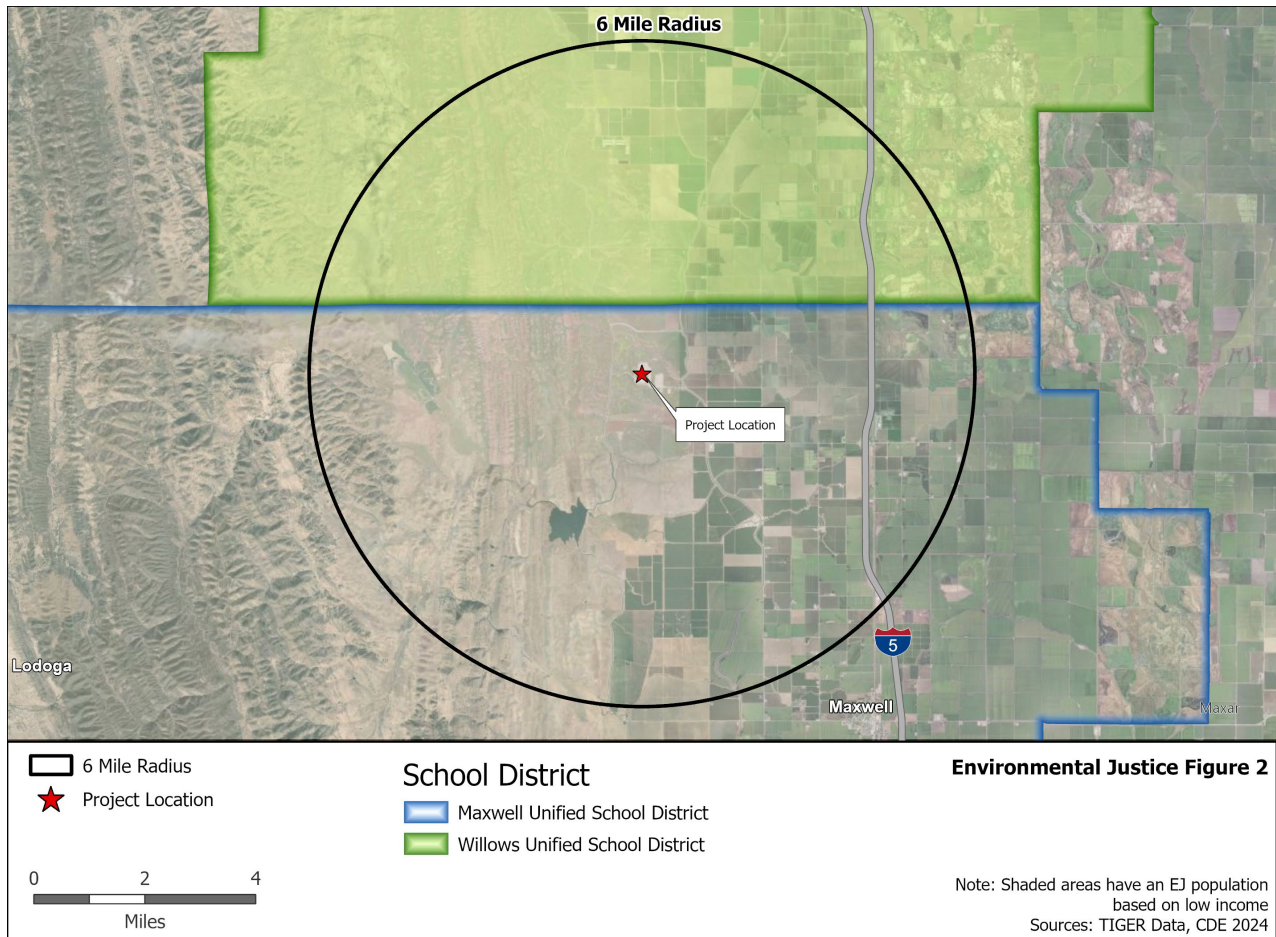
**Environmental Justice – Table 1
 Low Income Data within the Project Area**

COLUSA COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Maxwell Unified	350	215	62.0%
REFERENCE GEOGRAPHY			
Colusa County	4,720	3,715	78.7%
GLENN COUNTY SCHOOL DISTRICTS IN SIX-MILE RADIUS	Enrollment Used for Meals	Free or Reduced Price Meals	
Willows Unified	1,357	1,072	79.0%
REFERENCE GEOGRAPHY			
Glenn County	6,399	4,758	74.4%

Source: CDE 2024. California Department of Education, DataQuest, Free or Reduced Price Meals, District level data for the year 2023-2024, <http://dq.cde.ca.gov/dataquest/>.

The following technical areas considered impacts to EJ populations: Air Quality, Cultural Resources (indigenous people), Hazardous Materials Management, Land Use, Noise and Vibration, Public Health, Socioeconomics, Soil and Water Resources, Traffic and Transportation, Transmission Line Safety and Nuisance, Visual Resources, Waste Management, and Worker Safety and Fire Protection.





Environmental Justice Conclusions

For Air Quality, Cultural Resources, Hazardous Materials Management, Noise and Vibration, Public Health, Socioeconomics, Visual Resources, Waste Management, and Worker Safety and Fire Protection, staff concludes that impacts would be less than significant, and thus impacts on the EJ population, represented in **Figures 1** and **2**, and **Table 2**, would be less than significant.

CEC STAFF DETERMINATION

Staff has determined that the petition meets the criteria for approval by staff, and therefore, submission to the CEC for approval is not required. The petition meets the requirements for approval by staff, set by the California Code of Regulations, title 20, section 1769(a)(3)(A), that include the following:

- i. There is no possibility that the change may have a significant impact on the environment, or the change is exempt from the California Environmental Quality Act;
- ii. The changes would not cause the project to fail to comply with any applicable laws, ordinances, regulations, or standards (LORS); and
- iii. The changes will not require a change to, or deletion of, a condition of certification adopted by the Commission in the Decision or subsequent amendments.

Staff also concludes that none of the findings specified in section 1748(b) apply to the proposed changes and the proposed changes do not meet any of the criteria requiring the production of subsequent or supplemental review pursuant to Public Resources Code section 21166 and California Code of Regulations, tit. 14, section 15162.

WRITTEN COMMENTS

This statement of staff summary and approval of the proposed project changes has been filed in the docket for this project. Pursuant to California Code of Regulations, title 20, section 1769(a)(3)(C), any person may file an objection to the CEC staff's determination within 14 days of the filing of this statement on the grounds that the project change does not meet the criteria set forth in sections 1769(a)(3)(A). Absent any objections as specified in section 1769(a)(3)(C), this petition will be approved 14 days after this statement is filed.

For information on the Statement of Staff Approval of Post Certification Change, go to the CEC's project webpage (<https://www.energy.ca.gov/powerplant/combined-cycle/colusa-generating-station>). In the box labeled "Compliance Proceeding", click on the "Docket Log" to access the above document for this Proceeding.

Written comments or objections to staff's determination may be submitted using the CEC's e-Commenting feature, as follows: Go to the [CEC's project webpage](#) and click on either the "Comment on this Proceeding," or "[Submit e-Comment](#)" link. When your comments are filed, you will receive an email with a link to them.

Written comments or objections may also be mailed to:

California Energy Commission
Docket Unit, MS-4
Docket No. 06-AFC-09C
715 P Street
Sacramento, CA 95814-5512

All comments and materials filed with the Docket Unit will be added to the facility Docket Log and be publicly accessible on the [CEC's project webpage](#).

If you have questions about this document, please contact Compliance Project Manager Anwar Ali, Compliance Monitoring and Enforcement Unit, Safety and Reliability Branch, at (916) 6987498, or via email at anwar.ali@energy.ca.gov.

For information on public participation, please contact the CEC's Office of Public Advisor, Energy Equity, and Tribal Affairs at (916) 957-7910 or email at publicadvisor@energy.ca.gov.

News media inquiries should be directed to the CEC's Media Office at (916) 654-4989, or by email at mediaoffice@energy.ca.gov.

Subscription List: Colusa list serve