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Ms. Cathy Wolfe-White
U.S. Department of the Interior
Bureau of Land Management
2610 Sweetwater Avenue
Lake Havasu City, Arizona 86406

Ms. Carrie Marr
U.S. Fish and Wildlife Service Project Manager
2321 W Royal Palm Road, Suite 103
Phoenix, AZ 85021

Subject: Cumulative Project Footprint Update (2010-2012) for Field Work Performed in Accordance with the Programmatic Biological Assessment for the Pacific Gas and Electric Company Topock Compressor Station (Consultation Reference: AESO/SE 22410-2006-I-0333, 8 Feb 2007)

Dear Ms. Wolfe-White & Ms. Marr:

This letter has been prepared as a cumulative footprint summary of investigative and remedial activities, performed in accordance with the Programmatic Biological Assessment for the Pacific Gas and Electric Company Topock Compressor Station Remedial and Investigative Actions (PBA)(Consultation Reference: AESO/SE 22410-2006-I-0333, 8 Feb 2007).

This summary includes a tally for authorized projects that have been completed from January 2010 through December 2012. As of December 2012, twenty (20) wells have been installed in upland and floodplain areas of the project site, as covered in the PBA. All of these wells were installed in previously disturbed areas. Cumulatively between all activities there was zero acre floodplain habitat loss and 1.6 acres of loss to upland habitat.

PG&E appreciates your consideration of the attached report. Please contact Virginia Strohl, project biologist, at (559) 263-7417 or me at (805) 234-2257 with any questions or concerns.

Sincerely,

Yvonne Meeks
Topock Project Manager

cc: Pam Innis/DOI
Aaron Yue/DTSC

Cumulative Project Footprint Update (2010-2012) for Field Work Performed in Accordance with the Programmatic Biological Assessment for the Pacific Gas and Electric Company Topock Compressor Station (Consultation Reference: AESO/SE 22410-2006-I-0333, 8 Feb 2007)

On February 8, 2007, the US Fish and Wildlife Service (FWS, Phoenix, AZ) issued a memorandum (Ref No. 22410-2006-I-0333) to the Bureau of Land Management (BLM, Lake Havasu Field Office), indicating concurrence with effects determinations of a programmatic biological assessment (PBA) (CH2M HILL 2007), in compliance with Section 7 of the Endangered Species Act of 1973. The PBA concluded that proposed investigative and remedial activities 'may affect, but not likely adversely affect' the southwestern willow flycatcher (*Empidonax traillii extimus*), Yuma clapper rail (*Rallus longirostris yumanensis*), Mojave desert tortoise (*Gopherus agassizii*), razorback sucker (*Xyrauchen texanus*), and bonytail chub (*Gila elegans*) and its critical habitat in the Colorado River. It was also concluded that there would be "no effect" to the Colorado pikeminnow (*Ptychocheilus lucius*).

Only certain activities on lands owned or managed by the BLM, FWS, or PG&E are covered by the PBA through the end of 2012. Complete descriptions of approved investigative and remedial actions, as well as specific spatial and temporal limitations, are provided in the PBA (CH2M HILL 2007). Covered activities are divided into the following project activity categories:

- 1) Well installation, maintenance, operation, and decommissioning. Up to 30 new well clusters (15 in the floodplain and 15 in the uplands) may be installed and operated. This includes provision for access to well sites.
- 2) Pipeline installation, maintenance, and operation. This includes above- and belowground piping and appurtenances between wells, water-treatment, and water- and waste-management facilities.
- 3) Facility maintenance and operation. Includes periodic maintenance activities for water-treatment facilities, water- and waste-management facilities, and in-situ treatment operations.
- 4) Colorado River and soil sampling. Includes water sampling (shore, boat and sediment pore water sampling), seismic studies, and soil sampling throughout the project area.
- 5) Road maintenance. Maintenance of roads and paths for access to project facilities. Maintenance activities include grading, re-paving, installation of storm water culverts, and similar activities.
- 6) Restoration and mitigation activities. Includes activities to restore areas no longer needed for remediation or investigation activities to their pre-use conditions.
- 7) Emergency activities. In the event of a spill of contaminated water, fire, explosion, vehicle accident, equipment failure, chemical reactions, natural disaster, or medical emergency, response by emergency providers and PG&E personnel or contractors as described in the Hazardous Materials Management Business Plan are covered activities. Additional emergency consultation for particular incidents may be required.

The PBA (Section 3.3.7, page 3-24) defines habitat loss as removal of trees and perennial shrubs. Therefore, at the conclusion of a covered project activity, a 'footprint' is only recorded when the covered work activity is not in previously disturbed areas and there is 'habitat loss' as defined by the PBA. Habitat loss is limited to 2.5 acres of floodplain lands and 3.0 acres of upland areas

for placement of new facilities, maintenance of existing facilities, and other actions described in the PBA.

Tracking and Accounting

Projects that have been conducted since the last update provided in February 2010, are listed below. Brief descriptions and activity completion dates are included.

- The AOC 4 Removal Action was performed to remove fill material and debris deposited over the northern slope, and debris accumulating in the bottom of the ravine. The removal action began in December 2009 and continued through December 2010. Three primary methods were employed to remove fill and debris material from AOC 4: manual collection, vacuum excavation, and mechanical excavation. As a result of the activities, 1.60 acres of disturbance of upland habitat occurred from the Removal Action. Of the 1.6 acres upland disturbance, 0.043 acres of disturbance occurred within the AOC 4 Debris Ravine and 0.072 acres in Bat Cave Wash at its confluence with the Debris Ravine. These latter two areas are recognized as Jurisdictional Waters of the US and Waters of the State but are not within the floodplain and are considered to be in upland habitat. Work was conducted under Category 4 activities as described in the PBA (Section 3.3.1, page 3-14; CH2M HILL 2007). A biological resource completion report was completed on February 22, 2011 (CH2M HILL, 2011).
- The East Ravine Groundwater Investigation, involving the installation and development of groundwater monitoring wells, was completed in July, 2012. Groundwater monitoring wells were installed at eleven locations in the East Ravine and Topock Compressor Station area to provide additional groundwater characterization data for the RFI/RI for the Topock site. Well installation activities began in March 2011 and continued through July 2012. A biological resource completion report was completed on December 14, 2012 (CH2M HILL, 2012). Twenty new monitoring wells installed within 16 boreholes were established in the eleven locations during the investigation. However, since wells were constructed in unvegetated and previously disturbed areas such as within existing dirt roads and road shoulders, no habitat loss occurred as a result of this activity. Work was conducted under Category 4 activities as described in the PBA (Section 3.3.1, page 3-14; CH2M HILL 2007).
- The Geophysical Survey (surface resistivity logging) was conducted in October 2012 to locate the most favorable portion of the subsurface channel before drilling exploratory borings to support the evaluation of alternative freshwater sources. Two areas near alternative Sites A and C were studied. The geophysical survey areas were located in pre-existing disturbed areas and minimal trimming of tamarisk and creosote bush was required to obtain access to the geophysical survey locations. No additional areas were disturbed and no habitat loss occurred as a result of this activity. Work was conducted under Category 1 activities as described in the PBA (Section 3.3.1, page 3-14; CH2M HILL 2007). A biological resource completion report was completed on October 3, 2013 (CH2M HILL, 2013).

Conclusion

As of December 2012, 1.6 acres of upland habitat and zero acre of floodplain habitat were temporarily disturbed as a cumulative habitat loss for all activities that took place between February 2010 and December 2012. Several creosote bushes were removed along the north wall

of the ravine and one honey mesquite (*Prosopis glandulosa*) was trimmed as part of the AOC4 Removal Action. During the removal action, contaminated soil was removed from the root ball of this mesquite and replaced with clean soil.

References

CH2M HILL. 2007. Programmatic Biological Assessment for Pacific Gas and Electric Topock Compressor Station Remedial and Investigative Actions. January 2007.

CH2M HILL. 2011. Biological Resources Completion Report for AOC 4 Removal Action, Topock Compressor Station, Needles, California. February 22.

CH2M HILL. 2012. Biological Resources Completion Report for the East Ravine - Topock Compressor Station Groundwater Investigation, Topock Compressor Station Needles, California. December 14.