



Pacific Gas and
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Curt Russell
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July 5, 2017

Mr. Lucien Pino
Public Land Management Specialist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

Subject: Responses to California State Lands Commission's June 13, 2017 Letter

Dear Mr. Pino:

Pacific Gas and Electric (PG&E) is in receipt of the California State Lands Commission (CSLC) letter dated June 13, 2017 regarding the proposed PG&E Topock Compressor Station Final Groundwater Remediation Project near Needles, California. Our response is provided below.

The second paragraph of your June 13, 2017 letter referenced another letter dated February 27, 2017 to the California Department of Toxic Substances Control (DTSC) with comments on the PG&E Topock Draft Subsequent Environmental Impact Report (SEIR), which we have received a copy from DTSC. The February 27, 2017 letter to DTSC stated that the planned California riverbank extraction wells, conveyance pipelines, and the provisional slant wells extending underneath the Colorado River, are possibly Project components on State-owned sovereign land. The letter further describes that on navigable non-tidal waterways, the State holds fee ownership of the bed of the waterway landward to the ordinary low water mark, and a Public Trust easement landward to the ordinary high water mark.

Based on the above description of State-owned land, the only planned Project component that occurs in CSLC jurisdiction is a 12-inch fresh water line to be installed on the Arched Bridge crossing the Colorado River (also called the Abandoned Topock Highway Bridge) (see SEIR, page 3-37, 2nd paragraph). PG&E will submit an application requesting an addendum to PG&E's current lease, PRC 5438.1, for waterway crossings, to add this 12-inch water line.

The only provisional Project components that could occur in CSLC jurisdiction are the provisional slant wells screens extending underneath the Colorado River. For these components, if PG&E were to be directed by DTSC to install them in the future, PG&E will submit an application requesting an addendum to PG&E's current lease, PRC 8737.1 to include these wells at that time.

All other planned and provisional Project components near the riverbank (e.g., the California riverbank extraction well boreholes and associated conveyance pipeline, monitoring well MW-O) are outside of CSLC jurisdiction. The reason is that those Project components have been located a minimum of 20 feet landward from the ordinary high water mark, in compliance with an aesthetic mitigation measure (AES-2) prescribed in the 2011 certified EIR. The ordinary high water mark was delineated to support the placement of Project components (for details, please see Appendix A3 of the Final Basis of Design Report, *Wetlands and Waters of the United States, Final Delineation for the Topock Compressor Station Groundwater Remediation Project*, Figure 3-3).

The third paragraph of your June 13, 2017 letter refers to the portion of the proposed Project within Park Moabi, and on land leased to the County of San Bernardino. Only one specific Project component is within the Park boundary. It is an information trailer that will be located in the RV parking area just north and west of the intersection of Park Moabi Road and National Trails Highway. For this trailer, PG&E is in the process of completing an application for an occupancy permit and will submit the application to the County soon. Based on PG&E's understanding of the land boundaries within the Park, this trailer location is within the portion of the Park that is leased from the Bureau of Land Management – not from the State of California.

All other proposed Project components are outside of the Park Moabi boundary. With the exception of the 12-inch water line and future provisional slant well screens underneath the Colorado River discussed above, all planned or future provisional Project components are located either on Federal lands or lands owned by PG&E, BNSF Railway, the Fort Mojave Indian Tribe, and various private landowners.

Lastly, we would like to inform you that Ms. Yvonne Meeks is currently on leave. Please address all future correspondence to me at the following address:

Topock Compressor Station
P.O. Box 337
Needles, CA 92363

Please contact me at (760) 791-5884 if you have any questions or comments regarding this response.

Sincerely,

A handwritten signature in blue ink, appearing to read "Curt Russell".

Curt Russell
Topock Site Manager

cc: Aaron Yue/DTSC, Maureen Snelgrove/County of San Bernardino