Pacific Gas and Electric Company

Yvonne J. Meeks
Manager

Environmental Remediation

Mailing Address
4325 South Higuera Street
San Luis Obispo, CA 93401

Location
6588 Ontario Road
San Luis Obispo, CA 93405

805.234.2257
E-Mail: yjm1@pge.com

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Ms. Karen Baker, Chief, CHG, CEG
Office of Geology
Department of Toxic Substances Control
5796 Corporate Avenue,
Cypress, CA 90603

RE: Topock Compressor Station Groundwater Remedy
Request to Reduce Archaeological and Historical Site Annual Monitoring Effort

Dear Ms. Baker:

Responding to your letter of 7 October 2014, PG&E is providing written justification and rationale for our request to reduce the number of archaeological and historical sites examined during the annual monitoring and condition assessments in the Topock Compressor Station Groundwater Remediation Project (Project) area. This adjustment in monitoring strategies is offered in conformance with Mitigation Monitoring and Reporting Program (MMRP) CUL-1a-3a of the Final Groundwater Environmental Impact Report (EIR) which specifies "conducting yearly inspections (or less frequently upon approval by DTSC) of identified historical resources." Monitoring also is part of implementation of Sections 6.6.4, 6.6.5, and 6.8 of the Project's Cultural and Historic Properties Management Plan (CHPMP) and Appendix C of the Project's Programmatic Agreement.

Over the past decade we have frequently and repeatedly inspected archaeological and historical sites in the Project area and assessed their conditions. Most sites were first recorded in 2004. In 2005 and 2006, a select group of sites in close proximity to project activities was visited four times each year to determine if substantial adverse changes in site condition were occurring. From then through 2012, these select sites were inspected annually.

In 2013, condition assessments encompassed a substantially larger group of sites within the Project area. Fourteen sites were assessed in October 2013 in support of the Additional Soils Investigation EIR and another 69 sites were assessed in December 2013 in conformance with MMRP CUL-1a-3. Following discussion with DTSC's consulting archaeologist, 30 of these latter 69 sites were categorized as "core" sites based upon their close proximity to proposed remediation actions and the remaining 39 sites were categorized as "peripheral." Results of the December inspection were reported in *Topock Compressor Station Groundwater Remediation Project: Condition Assessments at Sixty-Nine Archaeological and Historical Sites* (Applied EarthWorks, Inc., March 2014). The report identified no impacts attributable to the ongoing project activities. Any site condition changes "appeared minor and invariably the result of naturally occurring processes such as erosion" (pg. 11 of report). The report recommended a more targeted selection of "core" sites for future monitoring efforts and the exclusion of all "peripheral" sites. These findings formed the basis for recommendations to adjust the assessment monitoring strategy transmitted to DTSC in our letter of June 10, 2014. The following information is offered in response to a subsequent DTSC request for additional rationale justifying the adjusted strategy.

The well-documented observations during these numerous site inspections should guide the scope of future monitoring efforts, not only to provide a clear, timely, and cost effective approach, but most importantly for benefit of the resources themselves and safety of workers. Our most basic and fundamental observations are:

- It is clear that the rate of change at archaeological and historical sites in the Project area resulting from remediation-related activities is negligible. Changes in the condition of resources can be wholly attributed to natural environmental processes and other ongoing non-project human activity in the area. The rate of these changes is well within the range of historic expectations for this area.

- Based on our observations, monitoring itself has the greatest potential to impact these sites as it is the only time that most sites have human activity on them; in addition, a risk of damage to other sites is introduced by continuing attempts to reach any particular site.

- The presence of monitoring personnel also has the potential to attract others to culturally sensitive areas, as the monitors and their activity may attract the attention of other visitors and users of the Project area.

Based on these observations, PG&E offers the following justification and rationale for more efficiently focusing annual monitoring on those sites in the immediate vicinity of the planned remedial actions, where the risk of inadvertent effects exists.

- The original Groundwater EIR Project Area was drawn deliberately broadly to accommodate the evolving Groundwater Remedy design. At the 90% design stage, the area impacted by the remedy is much more narrowly constrained and should be the focus of monitoring efforts.

- To date no impacts to sites have derived from the Project's activities, as evidenced by the multiple monitoring reports. Monitoring activities thus should be much more targeted.

- The intent of monitoring is to identify deterioration trends that may be attributable to remediation activities, not the effects of other users over whose activities PG&E has little control; these effects are the responsibility of the relevant land stewards operating in the area.

- Many of the sites we propose to exclude from further monitoring are not readily accessible, being separated from the active project areas by natural features such as steep-walled canyons, human built-environment features such as major roads and railways, and/or vegetation thickets (such as on the Arizona portion of the Project area).

- Due to the barriers mentioned above, and also steep slopes, unstable landforms, and other pronounced topographic features, attaining access to some sites located away from proposed remedy action areas poses a risk of injury to monitoring personnel, tribal representatives, and the many other participants in the monitoring efforts.

Therefore, for continued yearly inspections we propose to target 27 sites located in the close vicinity of proposed remedy features, access roads, staging areas, future operations and maintenance facilities, and other ground disturbing activities where human activity is concentrated by the Groundwater Remedy design. These sites include 24 from the December 2013 "core" site list, 2 from the October 2013 site assessment list, and the National Old Trails Highway/U.S. Highway 66 site. This approach will continue to ensure that sites that may be potentially affected by the Project are not being disturbed while protecting resources from impacts of the monitoring activity itself.

Under separate cover (because of Confidential site location information) to Susan Wilcox, an attached map shows those sites in the Groundwater EIR Project area that are recommended for continued annual monitoring, along with those not recommended for continued monitoring. Also attached is table which lists those archaeological and historical sites for which reduced monitoring is recommended, and our justifications for those recommendations.

We look forward to your review and approval of this adjusted field inspection proposal, and will be happy to meet further to discuss this matter.

Sincerely,

Yvonne Meeks
Topock Project Manager

cc: PG&E Topock Consultative Work Group members
PG&E Topock Geo/Hydro Technical Work Group members
Tribal Representatives on PG&E Contact List
Technical Review Committee