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Secretary for
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Department of Toxic Substances Control

Maureen F. Gorsen, Director
5796 Corporate Avenue
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Arnold Schwarzenegger
Governor

Sent Via Email

March 20, 2007

Mr. John Earle
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Havasu National Wildlife Refuge
U.S. Fish and Wildlife Service
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RESPONSE TO COMMENTS ON UPLAND IN-SITU PILOT STUDY WORK PLAN, PACIFIC GAS AND ELECTRIC COMPANY (PG&E), TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA

On November 6, 2006, the Department of Toxic Substances Control (DTSC) received your comments via email concerning the September 29, 2006 Upland In-situ Pilot Study Work Plan. As a result of DTSC's review, we offer the following responses to your comments. DTSC reprinted each of your comments below in italics. Our response is provided immediately following the comment. In addition, we have numbered each of the specific comments for ease of reference.

Comment 1: 1.3.3 paragraph 2, Do not single out just the FMIT. Either say "Tribes" or list all (Also, not all of the Tribes that are being consulted are along the Colorado River, e.g. Yavapai-Prescott.).

Response 1: DTSC recognizes that the land on which the project is proposed is sacred to more than the Fort Mojave Indian Tribe and that other tribes also share similar cultural heritage and beliefs. To address this concern, DTSC and PG&E will strive to properly identify and reference the appropriate tribe or tribes in future discussions including those not located along the Colorado River corridor.

Comment 2: 1.3.3 paragraph 2, I-40 is not a historic transportation resource (not 50 years old).

Response 2: DTSC concurs with your comment.

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Comment 3: 1.3.3 paragraph 3, not just sacred to FMIT, see comment above.

Comment 4: 3.1, Potential Impact on Cultural Resources paragraph, not just FMIT, change to "Indian people" or list all.

Reponses 3 and 4: DTSC understands that the project landscape is sacred to more than the Fort Mojave Indian Tribes, and that the Chemehuevi Indian Tribe, Cocopah Indian Tribe, Colorado River Indian Tribes, the Fort Yuma-Quechan Tribe, the Havasupai Tribe, the Hualapai Tribe, the Torres-Martinez Desert Cahuilla Indian Tribe, the Twenty-Nine Palms Indian Tribe, and the Yavapai-Prescott Indian Tribe also consider the landscape to be culturally significant and important.

Comment 5: Bottom of page 15/30, other locations are potential locations that could alternatively be considered (PTA-3 and PTA-4); however, since you are clearly not considering these as viable alternatives, just state that alternative locations were considered but dropped from this proposal.

Alternatively, you can evaluate these two locations to the same degree as PTA-8. Is there a reason you did not also identify the other alternative locations originally suggested and state that they had been dropped?

Response 5: According to PG&E, the additional information for PTA-3 and PTA-4 is not relevant to this work plan as these well locations were not practically viable. PG&E has issued a revision to Figure 3 in their letter response to your comments on February 28, 2007 to exclude these areas.

Comment 6: 3.4 Paragraph 1, Figure 8 only shows 2 of the 4 possible equipment staging areas. Add the other two alternative locations.

Response 6: PG&E recognizes that only two of the four staging areas are shown on Figure 8. A new figure, Figure 8A, was sent to you on February 28, 2007 within PG&E's letter response to your comments. The new figure shows the additional two areas.

Comment 7: Figure 3, add all locations considered for upland but dropped. Delete PTA-3 and PTA-4 or evaluate these two locations in text and add figures for PTA-3 and PTA-4 similar to figure 5 for PTA-8.

Response 7: See Response 5 above.

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DTSC hopes that you will find the responses to your comments valuable in your understanding of the proposed activities. If you have any questions or comments regarding this letter, please feel free to contact me at (714) 484-5439.

Sincerely,



Aaron Yue
Project Manager
Geology, Permitting and Corrective Action Branch

Ay:030702B

cc: PG&E CWG Members (via email)
Native American Indian Tribal Contacts – PG&E Topock Project (via email)