

Topock Compressor Station Remediation Project 2017 Annual Site Condition Assessments

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MANAGEMENT SUMMARY

Pacific Gas and Electric Company (PG&E) is conducting the Topock Remediation Project (Project) under the direction of the U.S. Department of the Interior (DOI) and the California Department of Toxic Substances Control (DTSC). Investigative and remedial activities at the Topock Compressor Station, including both interim and long-term measures, are being carried out under the Resource Conservation and Recovery Act Corrective Action process, as well as the Comprehensive Environmental Response, Compensation, and Liability Act.

The Project is subject to federal and state law governing the management of archaeological and historical sites. The Project is considered a federal undertaking subject to Section 106 of the National Historic Preservation Act. The Bureau of Land Management (BLM) is the lead federal agency for Section 106 compliance, which has been achieved through implementation of a 2010 Programmatic Agreement (PA), as amended in 2017 (Bureau of Land Management [BLM] 2017), and a 2012 Cultural and Historical Properties Management Plan (CHPMP; BLM 2012).

DTSC is lead state agency for compliance with the California Environmental Quality Act (CEQA). Pursuant to CEQA, DTSC certified a Groundwater Remediation Project Final Environmental Impact Report (Groundwater FEIR) in January 2011 (California Department of Toxic Substance Control [DTSC] 2011) and a Soil Investigation Project FEIR (Soil FEIR) in August 2015 (DTSC 2015). PG&E has inventoried the combined FEIR Project areas for archaeological and historical sites. Both Groundwater Remediation Mitigation Measure CUL-1a-3a and Soil Investigation Mitigation Measure CR-2c require PG&E to conduct site inspections to assess the condition of identified historic resources, referred to here as the Annual Site Condition Assessment Program. One purpose of the program is to determine if substantial adverse changes have occurred in the condition of the historic resources during the past year. According to Mitigation Measure CR-2c, site assessments should include photography to document whether any change in resource condition has occurred and field observations documented in a Site Condition Assessment Form and a database spreadsheet. DTSC is preparing a Subsequent Environmental Impact Report (SEIR) to analyze the potential environmental impacts from modifications made to the groundwater remedy Project since 2011 and anticipates certifying the SEIR in January 2018 (DTSC 2017).

Applied EarthWorks, Inc. (Æ) conducted the 2017 site condition assessments from November 6–9, 2017, focusing on the 2011 Groundwater FEIR Project Area supplemented with adjustments proposed by the draft 2017 SEIR. Ten Native American tribal representatives participated during the 3 field days, including three representing the Fort Mojave Indian Tribe, two each representing the Colorado River Indian Tribes, the Chemehuevi Indian Tribe, and the Cocopah Indian Tribe, and one representing the Hualapai Indian Tribe. Representatives of PG&E, DTSC, and DOI also participated. Participants inspected entry points to 96 sites. They did not visit entry points to eight other targeted sites due to accessibility or other factors. Of those sites inspected, one exhibited a changed condition that Æ documented in an updated Site Condition Assessment Record. Æ, the Tribes, and PG&E worked collaboratively to identify procedural adjustments that

would make the condition assessments more effective and safer to carry out. These recommendations include removal of 5 sites from the target list, reduced frequency of inspection at 15 sites, and continued yearly inspections of entry points to 83 sites. In addition, PG&E deferred a recommendation for one site (CA-SBR-29940) pending receipt of further information.

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1

INTRODUCTION

The Topock Compressor Station (TCS) is on the west side of the Colorado River approximately 12 miles southeast of Needles in San Bernardino County, California, and 0.5 mile west-southwest of Topock, Mohave County, Arizona. Prior to the mid-1980s, Pacific Gas and Electric Company (PG&E) used hexavalent chromium as an anticorrosion agent in the station's cooling towers. Following standard industry practices of the time, between 1951 and 1964 untreated wastewater from these towers was discharged into Bat Cave Wash, a rocky arroyo on the west side of the station. Over time, the discharged hexavalent chromium seeped into the groundwater. Aside from water, historical operations at TCS have also resulted in contamination in soils. PG&E is conducting remedial investigations and response actions relating to historic releases of hexavalent chromium from the TCS and resulting groundwater and soil contamination in the vicinity. PG&E is conducting the Topock Remediation Project (Project) under the direction of the U.S. Department of the Interior (DOI) and the California Department of Toxic Substances Control (DTSC). Investigative and remedial activities at the TCS, including both interim and long-term measures, are being carried out under the Resource Conservation and Recovery Act Corrective Action process, as well as the Comprehensive Environmental Response, Compensation, and Liability Act. The Project involves the design, construction, operation, and maintenance of a groundwater remediation system (Groundwater Remedy) to convert soluble hexavalent chromium into non-soluble, and less toxic trivalent chromium form.

The Project is subject to federal and state law governing the management of archaeological and historic sites. The Project constitutes a federal undertaking subject to Section 106 of the National Historic Preservation Act. The Bureau of Land Management (BLM), lead federal agency for Section 106 compliance, implemented a 2010 Programmatic Agreement (PA), as amended in 2017 (Bureau of Land Management [BLM] 2017), and a 2012 Cultural and Historical Properties Management Plan (CHPMP; BLM 2012).

DTSC is the lead state agency for compliance with the California Environmental Quality Act (CEQA). Pursuant to CEQA, DTSC certified a Groundwater Remediation Project Final Environmental Impact Report (Groundwater FEIR) in January 2011 (California Department of Toxic Substance Control [DTSC] 2011) and a Soil Investigation Project FEIR (Soil FEIR) in August 2015 (DTSC 2015). PG&E has inventoried the combined FEIR Project areas for archaeological and historic sites. In support of the design of the Groundwater Remedy, PG&E has also inventoried areas for archaeological and historical sites outside of the combined FEIR project areas where remedy infrastructure is proposed.

Both Groundwater Remediation Mitigation Measure CUL-1a-3a and Soil Investigation Mitigation Measure CR-2c require PG&E to conduct inspections of known resources to assess the condition of the resource, referred to here as the Annual Site Condition Assessment Program. Measure CUL-1a-3a directs PG&E to conduct "yearly inspections (or less frequently upon approval by DTSC) of identified historical resources, including inspections of the Topock

Cultural Area, to determine if substantial adverse changes have occurred relative to the condition of the historical resources during the past year or prior to the implementation of the proposed [P]roject.” Measure CR-2c directs that the site assessment program includes “confirmation of resource boundaries, with sub-meter GPS; any relocation of previously identified features; confirmation of locations, quantities, and types of artifacts present; and photography to document whether any change in resource condition has occurred.” Mitigation Measure CR-2c also directs field observations be documented in a Site Condition Assessment Form (SCAR) and a database spreadsheet. Site condition assessment participants met 3 weeks prior to initiation of fieldwork to assess and modify past field methods to best achieve these goals. DTSC also is preparing a Subsequent Environmental Impact Report (SEIR) to analyze the potential environmental impacts from modifications made to the groundwater remedy Project since 2011 and anticipates certifying the SEIR in January 2018 (DTSC 2017).

Hearth et al. (2013), Moloney and Price (2014, 2015), and Moloney and Hanes (2016a, 2016b) report previous annual site condition assessments for 2013, 2014, 2015, and 2016. Records resulting from these assessments form a baseline for identifying any changes, past or ongoing, that have affected these sites since their original recording or last inspection.

2 METHODS

PG&E conducted the annual site condition assessments for 2017 November 6–9, 2017. In conformance with mitigation measure CUL-1a-3a, PG&E retained Applied EarthWorks, Inc. (Æ) as its Qualified Cultural Resource Consultant to perform the required site assessments. In anticipation of the November field dates, PG&E hosted a pre-field meeting October 16, 2017, at the TCS facility to discuss targeted sites and a field plan for inspection. Among the 13 attendees were representatives from the Chemehuevi Indian Tribes (CIT), Colorado River Indian Tribes (CRIT), Fort Mojave Indian Tribe (FMIT), Hualapai Indian Tribe, and Cocopah Indian Tribe, as well as representatives of PG&E, DTSC, and Æ.

During the pre-field meeting, participants reviewed all the existing SCARs noting which may be best observed from a distance with use of binoculars. Once in the field, participants further revised the earlier site condition assessment strategy by grouping the 2017 target sites based on their proximity to each other and assessed current conditions from newly established photo points overlooking site locations. The goal of the revised approach is to better document potential incursions into sites from proposed remediation construction activities. Æ thus photo-documented potential points of access into site locations and/or groups of sites. This approach documents current conditions of potential site access points for comparison with those same points during future condition assessments. Past photo-documentation of individual archaeological resources created a useful baseline photographic record of each cultural property. The participants committed to reevaluating photo points and individual site assessment periods during the following fieldwork period.

Consistent with CUL-1a-3a, the assessment placed particular emphasis on non-Project-related human impacts, although participants also looked for and documented Project-related and natural impacts as well. Where participants identified potential issues, they more closely examined a site for comparison with conditions recorded during prior site assessments. PG&E brought a complete set of site SCARs to assist in these condition assessments.

Applying the November 2014 *Archaeological and Historical Field Procedures and Protocols for Site Monitoring and/or Verification Activities* and the procedures in Soil FEIR Mitigation Measure CR-2c, PG&E notified Native American tribal representatives and other interested parties of the forthcoming site assessment fieldwork on October 19, 2017. PG&E sent a reminder along with Project maps on November 1, 2017. PG&E conducted a pre-fieldwork kick-off meeting on the patio of the TCS on November 6, 2017. During the kick-off meeting, PG&E discussed fieldwork health and safety issues; distributed relevant maps and site records (if requested by participants); and addressed site assessment objectives and proposed methods, as well as questions or concerns expressed by participants. Table 2-1 lists the 2017 fieldwork participants.

**Table 2-1
2017 Annual Site Condition Assessment Participants**

Participant	Affiliation^a	Titles	Dates Present
Patrick Moloney	Æ	Archaeologist	11/6-8/17
Diane Douglas	Æ	Archaeologist	11/6-8/17
Renee Elder	Æ	Archaeologist	11/6-8/17
Glenn Caruso	Æ	Principal Archaeologist	11/6-7/17
Nick Zeyounma	CRIT	Tribal Monitor	11/6-8/17
Rudy Martinez	CRIT	Tribal Monitor	11/6-7/17
Delbert Holmes	FMIT	Tribal Monitor	11/6/17
Chris Harper	FMIT	Archaeologist	11/6-8/17
Cecil Collier	FMIT	Tribal Monitor	11/7/17
Ron Escobar	CIT	Project Manager	11/6-8/17
Winston Escobar	CIT	Tribal Monitor	11/6-8/17
Dawn Hubbs	Hualapai	Archaeologist, THPO	11/6-8/17
Edgar Castillo	Cocopah	Project Manager	11/6-8/17
Jill McCormick	Cocopah	Archaeologist	11/6-8/17
Pam Innis	DOI	CHF Remedial Project Manager	11/6-8/17
Aaron Yue	DTSC	Topock Project Manager	11/6-8/17
Curt Russell	PG&E	Topock Project Manager	11/6/17
Jennifer Darcangelo	PG&E	Tribal and Cultural Resource Land Consultant	11/6-8/17
Kim Cuevas	PG&E	Senior Cultural Resource Specialist	11/6-7/17

a- Æ = Applied EarthWorks, Inc.; CIT = Chemehuevi Indian Tribes; Cocopah = Cocopah Indian Tribe; CRIT = Colorado River Indian Tribes; DOI = U.S. Department of the Interior; DTSC = California Department of Toxic Substance Control; FMIT = Fort Mojave Indian Tribe; Hualapai = Hualapai Indian Tribes; PG&E = Pacific Gas and Electric Company.

Fieldwork began November 6 and was completed November 8, 2017. Each workday began with a tailgate safety meeting and daily logistics discussion. PG&E ended the workday with a daily debriefing and soliciting questions, observations, and suggestions of participants; these are noted below.

The total target site population for the previous 2016 condition assessments consisted of 90 sites. The addition of recently recorded sites to the 2017 target list led to a total of 103 sites within the combined Groundwater FEIR/Soil FEIR Project areas (Figures 2-1 and 2-2). PG&E added an additional site to the inspection list at tribal request, making a total of 104 sites identified for inspection.

Æ updated a site's SCAR if participants observed any recent disturbance or other impacts. Participants made these determinations of recent disturbance based, in part, on in-field review of past records that indicate whether any observed disturbances are new and/or ongoing. Æ also documented the causes of recent disturbances. Æ established photo points to achieve this new assessment focus and provide documented records for comparison during similar future site condition assessments. Photo points were mapped using PG&E's hand-held Trimble Geo X7 series Global Positioning System [GPS] receiver. At each site, participants offered their observations and suggested protective recommendations, and Æ noted such recommendations.

On November 9, 2017, Project participants held a wrap-up meeting at the BLM office in Lake Havasu City, Arizona. Participants reviewed field notes (photo points, UTM's, etc.) for each site and discussed recommendations to be submitted to the lead state and federal agencies regarding frequency of future visits to each site. The team also discussed other information or concerns to be included in this report.

Figure 2-1 Archaeological and historical sites identified for the 2017 site condition assessment program.
(Figure deliberately excluded from nonconfidential version)

**Figure 2-2 Annual site condition assessment, site CA-SBR-2910H.
(Figure deliberately excluded from nonconfidential version)**

3 FINDINGS

Sites examined during the 2017 condition assessments are all within the Topock Cultural Area recognized in the Groundwater FEIR. Members of the FMIT and CRIT periodically visit many sites in the area for religious and ceremonial purposes thus stimulating active participation in the site condition assessment process and contributing to the findings reported here.

3.1 SITE ASSESSMENT FIELD OBSERVATIONS

Site condition assessment participants inspected and photo-documented 96 sites of the 104 sites initially targeted for 2017. This total included inspection of one site, CA-SBR-28967, not included in the original target list. A tribal participant requested the addition due to concerns about exposure of the site to potential damage from off-highway vehicle (OHV) activity. Æ observed and photographed nearby OHV tracks at this site. Located on the same landform as CA-SBR-28964H, monitors can record future disturbances when photo-documenting that site. The eight sites not visited include:

- CA-SBR-29940—participants expressed concern as to ease and safety of access; visits to this site were postponed until better access can be established.
- CA-SBR-29938 and -29943—both sites, initially recorded in 2016 only months before the 2016 site condition assessment, were newly added to the 2017 site condition assessment program; however, due to their proximity to the Topock Maze and the recent passing of a Fort Mojave Tribal Elder all agreed that sites would not be visited during this effort.
- CA-SBR-13796—the site is distant from proposed remediation work and is only accessible through the TCS and by climbing down unstable slopes. Participants thus agreed to recommend the site’s removal from the site condition assessment program.
- P-03-027648, The Topock Compressor Station—previously determined not eligible to the National Register of Historic Places, it is currently a functioning industrial facility potentially exposing monitoring personnel to hazards.
- CA-SBR-6693—the site is an active Burlington Northern Santa Fe Railway (BNSF) railroad exposing monitoring personnel to potential hazards. In addition, there is no current permission to access.
- AZ L:7: 71—accessible only through BNSF railroad right-of-way thus exposing monitoring personnel to multiple potential hazards. In addition, there is no current permission to access.
- AZ I: 14: 334—an active BNSF railroad, exposing monitoring personnel to multiple potential hazards. In addition, there is no current permission to access.

Based on the field inspections, only one SCAR required substantial updating due to changed site condition. CA-SBR-11917 has been severely damaged by OHV activities. Æ thoroughly photo-documented the condition and damage to the site. PG&E reported the damage to the BLM and Pamela Innis of DOI. All updated SCAR forms are available online. The link can be provided upon request due to the confidentiality of information contained in the forms.

A participant reported one possible previously unidentified site. AE assessed the reported observation in a follow-up field visit and determined it was an extension to existing site CA-SBR-11973. The updated DPR 523 site record is provided in Appendix A. The potential feature does not appear to be located near proposed remediation activity.

3.2 SITE ASSESSMENT RECOMMENDATIONS

At the November 9, 2017, site condition assessment wrap-up meeting, participants assessed observations made over the previous three days and developed recommendations for future inspections for submission to the DTSC and DOI/BLM for consideration. Based on these discussions participants recommended 83 sites for continued yearly inspections, 15 for reduced frequency of inspection (CA-SBR-11702, -11865H, -11929, -11943-47, 11950-53, -11972, and AE-Topock-214 and -215); and 5 for removal from the site condition assessment program (CA-SBR-6693 and -13796; AZ L7:71, AZ I:15:334; and, P-03-027648) (see Table 3-1). Due to inaccessibility and concerns over the safety of the field team, participants did not visit any of the five sites recommended for removal from future site condition assessments. Of the 15 sites recommended for decreased periods of inspection, 14 are lithic artifact scatters and 1 is a feature related to the historic railway. The recommendations for decreased inspection are based largely on difficulty accessing the sites and their lack of proximity to proposed Project actions. Participants deferred a recommendation for the future assessment of one site, CA-SBR-29940, until a better means of monitoring is identified. The meeting participants also made several other site observations included in Table 3-1.

Following the November 9 meeting, DTSC transmitted the meeting notes in a November 20 email to all meeting participants for their review and comment. DTSC received a response from Jill McCormick (Cocopah Indian Tribe) that it was in order.

**Table 3-1
2017 Annual Site Condition Assessment Results**

Trinomial or ASM #	Temp #	Description	Notes (PP = Photo Point)	Schedule Recommendations^a
CA-SBR-12641/H	—	Lithic/historic site	PP 001: Overview from mound at south end of site. PP 002: overview of possible access to site	1
CA-SBR-11867	Æ-Topock-7	Lithic assay station	PP 003: Overview from southeast end of site on road including CA-SBR-11705/H	1
CA-SBR-11705H	Æ-Topock-143/H	Historic-era quarry site	PP 004–005: Overview from north end of site on Eastern Access Road (EAR). PP 006–007: Overview from southwestern corner of site at MW13. PP 008–009: Overview from southern end of site at boulder pile.	1
CA-SBR-11942	Æ-Topock-82	Lithic assay station	PP 010: Overview from south end of site.	1
CA-SBR-11704H	—	Historic-era quarry site	PP 011–012: Overview from boulders opposite IM3 gate. PP 013–014: Overview from monitoring well at east end of site.	1
CA-SBR-17219	Æ-Topock-183	Lithic assay station	PP 015: Overview from far end of CA-SBR-11704H graded area.	1
CA-SBR-11939	Æ-Topock-79	Lithics	PP 016–018: Overview from push pile west of access road that bisects CA-SBR-11939.	1
CA-SBR-11938	Æ-Topock-78	Lithics ceramics		
CA-SBR-11937	Æ-Topock-77	Lithics		
CA-SBR-11940	Æ-Topock-80	Lithic assay stations	PP 019–020: Overview CA-SBR-11940 from prow above CA-SBR-11940.	1
CA-SBR-11871	Æ-Topock-11			
CA-SBR-11979	Æ-Topock-119	Lithic assay/reduction station	PP 021–022; Overviews from previous PP location. OHV disturbance noted in prior inspections not ongoing.	1
CA-SBR-17255	Æ-Topock-190	AP 2: lithic scatter	PP 023: Overview from access road.	1
CA-SBR-11978	Æ-Topock-118	Lithic assay station	PP 025: Overview from access road.	1
CA-SBR-11872	Æ-Topock-12	Lithic assay/reduction station	PP 024: PP 020: Overview from access road.	1
CA-SBR-29940	AE-Topock-207	AP2: lithic scatter	No adequate or safe access. Group deferred monitoring until better access could be arranged	N/A
CA-SBR-11905	Æ-Topock-45	Lithic assay station	PP 026: Overview of CA-SBR-11905 from push pile to west. Site is secluded and protected by push piles	1
CA-SBR-11898	Æ-Topock-38	Lithic assay/reduction station	PP 027: Overview from creosote bush south end of site. CA-SBR-11899 in background.	1

Table 3-1 (continued)
2017 Annual Site Condition Assessment Results

Trinomial or ASM #	Temp #	Description	Notes (PP = Photo Point)	Schedule Recommendations^a			
CA-SBR-11899	Æ-Topock-39/-127	Lithic assay/reduction station/quarry	PP 028–029: Overview of CA-SBR-11899, with CA-SBR-11899 in background, from CW-3D. Tire rutting and purposeful displacement of a rock was noted; BLM and PG&E management alerted for perhaps added training of field construction personnel	1			
CA-SBR-11961	Æ-Topock-101	Lithic assay stations	PP 030–031: Overviews of CA-SBR-11961/-11962/-11963/-11964/-11965 from SW end of sites. PP 031–035: Overviews of CA-SBR-11961/-11962/-11963/-11964/-11965 from CW-18.	1			
CA-SBR-11962	Æ-Topock-102						
CA-SBR-11963	Æ-Topock-103						
CA-SBR-11964	Æ-Topock-104						
CA-SBR-11965	Æ-Topock-105						
CA-SBR-11969	Æ-Topock-109	Lithic quarry /reduction stations; small circular intaglio/ prehistoric trail	PP 036/037/038 & 039: Overviews of CA-SBR-11959/-11966/-11967/-11968/-11969/-11970 from Well OW-2D. Use of binoculars preferred for these observation points.	1			
CA-SBR-11966	Æ-Topock-106						
CA-SBR-11970	Æ-Topock-110						
CA-SBR-11959	Æ-Topock-99						
CA-SBR-11967	Æ-Topock-107						
CA-SBR-11968	Æ-Topock-108	Lithic assay/reduction stations	PP 040–043: Overviews CA-SBR-11956/-11959/-11960/-11967/-11968 from OW-5S.	1			
CA-SBR-11959	Æ-Topock-99						
CA-SBR-11967	Æ-Topock-107						
CA-SBR-11968	Æ-Topock-108						
CA-SBR-11960	Æ-Topock-100						
CA-SBR-11956	Æ-Topock-96	Lithic assay/reduction station/rock cairn	PP 044–047: Overview of CA-SBR-11703 from mound near south end of site. PP 048: Overview of potential access point to CA-SBR-11703 from south end of site.	1			
CA-SBR-11703	Æ-Topock-97/-98						
CA-SBR-11943	Æ-Topock-83				Possible temporary camp	PP 049: Overview CA-SBR-11943 from south end of site at same PP as previous site inspections.	2
CA-SBR-11944	Æ-Topock-84				Lithic assay station	PP 050: Overview CA-SBR-11944 from previous PP to north and above site.	2
CA-SBR-11945	Æ-Topock-85				Lithic assay station; eroded rock cairn	PP 051: Overview CA-SBR-11945 from western end of site.	2
CA-SBR-11951	Æ-Topock-91	Lithic assay stations	PP 052–053: Overviews of CA-SBR-11951/-11952/-11953 from above on CA-SBR-11945 mesa.	2			
CA-SBR-11952	Æ-Topock-92						
CA-SBR-11953	Æ-Topock-93						

Table 3-1 (continued)
2017 Annual Site Condition Assessment Results

Trinomial or ASM #	Temp #	Description	Notes (PP = Photo Point)	Schedule Recommendations^a
CA-SBR-11702	Æ-Topock-88/-89	Lithic assay/reduction stations	PP 055–056: Overview CA-SBR-11702 from utility poles; possibly should follow up on Needles Power access/decommissioning policy	2
CA-SBR-11950 CA-SBR-11929 —	Æ-Topock-90 Æ-Topock-69 AE-Topock-214	Lithic & ceramic scatters	PP 057–060: Overview CA-SBR-11950/-11929/AE-214 from CA-SBR-11702 mesa.	2
CA-SBR-11946 CA-SBR-11947 —	Æ-Topock-86 Æ-Topock-87 Æ-Topock-215	Lithic & ceramic scatters	PP 061–063: Overview CA-SBR-11946/-11947 from above on CA-SBR-11702 mesa.	2
CA-SBR-11861H	Æ-Topock-1H	Historic-era refuse scatter	PP 064: Overview CA-SBR-11861H from knoll to the west of access road.	1
CA-SBR-11698	—	Lithic assay/reduction station; rectangular rock alignment	PP 065: Overview CA-SBR-11698H from knoll to the west of access road.	1
CA-SBR-11697/H	—	Historic-era refuse scatter/lithic scatter	PP 066–067: Overview CA-SBR-11697/H from creosote bush NW of OW well.	1
CA-SBR-11972	Æ-Topock-112	AP 2: lithic scatter	PP 068: Overview of CA-SBR-11972 from mesa above site CA-SBR-11941. Site also visited and recommended close biennial visit by 1 or 2 monitors because of OHV disturbances nearby; possible trail segment noted nearby to be further examined	2
CA-SBR-11941	Æ-Topock-81	AP 2: lithic scatter	PP 068: Overview of CA-SBR-11941/-11972 from mesa above CA-SBR-11941.	1
CA-SBR-11900 CA-SBR-11901 CA-SBR-11902	Æ-Topock-40 Æ-Topock-41 Æ-Topock-42	AP 2: lithic scatters	PP 069: Overview CA-SBR-11900/-11901/-11902 from CA-SBR-11941 mesa above sites. PP 070: Overview of OHV disturbance on slopes and in washes from CA-SBR-11941 mesa.	1
CA-SBR-11922	Æ-Topock-62	AP13: aboriginal trail. AP8: rock alignment	PP 071: Overview CA-SBR-11922 from large flat boulder south of site.	1
CA-SBR-29938	Æ-Topock-205	AP2: lithic scatter.	Not visited at the request of Tribes due to Tribal member passing.	1
CA-SBR-29943	Æ-Topock-210	AP13: aboriginal trail. AP8: rock alignment	Not visited at the request of Tribes due to Tribal member passing.	1
CA-SBR-28964H	Æ-Topock-195H	AH 4: trash scatter	PP 072–075: Overview CA-SBR-28964H general area for OHV access points.	1

Table 3-1 (continued)
2017 Annual Site Condition Assessment Results

Trinomial or ASM #	Temp #	Description	Notes (PP = Photo Point)	Schedule Recommendations^a
CA-SBR-11917	Æ-Topock-57	AP8: rock ring feature	PP 076–081: Closer inspections of CA-SBR-11917/-11918/AE-192	1
CA-SBR-11918	Æ-Topock-58	AP16: intaglios,	OHV disturbances on mesa top.	
—	Æ-Topock-192	AP3: ceramic scatter AP16: cleared circle	PP 082–084: Overviews of CA-SBR-11917/-11918/AE-192 access slopes OHV disturbances from below. Contact BLM regarding ongoing access to mesa by OHVs especially those connected to Pirate’s Cove.	
CA-SBR-28967	Æ-Topock-198	Intaglio	PP 085: Overview of CA-SBR-28967 OHV disturbances skirting site. Contact BLM regarding ongoing access to wash by OHVs especially those connected to Pirate’s Cove.	1
CA-SBR-11912	Æ-Topock-52	Lithic assay station	PP 086: Overview CA-SBR-11912 from east end of Pirate’s Cove parking lot documenting site access. Use of binoculars preferred for this observation point.	1
CA-SBR-11928	Æ-Topock-68	Lithic quarry/assay/ reduction area	PP 087: Overview CA-SBR-11928 from berm on road shoulder east of site.	1
CA-SBR-13790	Æ-Topock-139	Historic geoglyph	PP 088: Overview CA-SBR-13790 from south.	1
CA-SBR-11936	Æ-Topock-76	Lithic quarry/assay/ reduction area	PP 089: Overview of CA-SBR-11936 from CA-SBR-13790 mesa showing access points. PP 090–092: Overview CA-SBR-11936 from north end of site. Use of binoculars preferred for these observation points.	1
CA-SBR-11862H	Æ-Topock-2H	El Rancho Roadhouse remains	PP 093: Overview CA-SBR-11862H from Camp J access road east end of site.	1
—	Æ-Topock-204H	AP 2: lithics.	PP 094–095: Overview CA-SBR-11866H/AE-214 Camp J access	1
CA-SBR-11866H	Æ-Topock-6H	AP 3: ceramics. AH 4: trash dump, sedimentation ponds/ditch	road north of sites.	
CA-SBR-11865H	Æ-Topock-5H	Railroad grade/siding	PP 096: Overview CA-SBR-11865H from east end.	2
CA-SBR-11997H	Æ-Topock-135H	Rock and mortared bridge remains	PP 097–098: Overview CA-SBR-11997H from western bank and zoomed-in. Suggested obtaining additional photos to assess appropriate treatment from architectural history perspective	1
CA-SBR-11932	Æ-Topock-71/ -72/-73	Lithic quarry/assay/ reduction area/rock ring/groundstone production/petroglyph	PP 099: Overview of CA-SBR-11932/H from northwest end on NOTH (3845271/729560) PP 100: Overview of CA-SBR-11932/H from northeast end on	1

Table 3-1 (continued)
2017 Annual Site Condition Assessment Results

Trinomial or ASM #	Temp #	Description	Notes (PP = Photo Point)	Schedule Recommendations^a
			NOTH (3845201/729592). Cross reference to Route 66 documentation	
CA-SBR-11994	Æ-Topock-134	Lithic assay/reduction station	PP 101: Overview CA-SBR-11994 from 3844855/729651 on EAR.	1
CA-SBR-17254	Æ-Topock-189	AP 2: lithic scatter	PP 102: Overview CA-SBR-17254 from NW bank 3844693/729784. Gullyng, erosion, and trash noted.	1
CA-SBR-11910/H	Æ-Topock-50	Lithic assay station	PP 103: Overview CA-SBR-11910/H from NOTH (3844574/729724).	1
CA-SBR-13791H	Æ-Topock-140H	Railroad refuse scatter	PP 104–105: Overview CA-SBR-13791H from across wash 3844495/729857.	1
P-36-021486	Æ-Topock-144H	Route 66 historical marker	PP 106: Overview ROUTE 66 sign from NW 3844364/729939. PP 107: Overview ROUTE 66 sign from NE 3844357/729967.	1
CA-SBR-12642H	Æ-Topock-138H	Concrete bridge footing	PP 108: Overview CA-SBR-12642H from NE 3844430/729921.	1
CA-SBR-29935	Æ-Topock-201	AP 2: lithic scatter	PP 109: Overview CA-SBR-29935 from SE and above near fenced utility site 3844346/729865. Gullyng and erosion noted.	1
CA-SBR-29936	Æ-Topock-202	AP 2: lithic scatter	PP 110: Overview CA-SBR-29936 from access road 3844419/729769. PP 112: Overview CA-SBR-29936 from wash to South 3844377/729729. Photos taken from NE of site.	1
CA-SBR-29937	Æ-Topock-203	AP 2: lithic scatter	PP 111: Overview CA-SBR-29937 from access road 3844419/729769. PP 113: Overview CA-SBR-29937 from wash to South 3844377/729729. Photos taken from NE of site.	1
CA-SBR-13793H	Æ-Topock-142H	Excavated historic-era pit	PP 114: Overview CA-SBR-13793H from opposite bank (3844231/729910).	1
CA-SBR-14698	Æ-Topock-149	Lithic assay station	PP 115: Overview CA-SBR-14698 from southwest (3844196/730003).	1
CA-SBR-17220/H	Æ-Topock-184/H	Lithic assay station/historic refuse scatter	PP 116: Overview CA-SBR-17220/H from south (3844231/729974).	1
CA-SBR-11864	Æ-Topock-4	Lithic assay station	PP 117: Overview CA-SBR-11864 from road above and to south (3844062/729598) documenting possible access points.	1

Table 3-1 (continued)
2017 Annual Site Condition Assessment Results

Trinomial or ASM #	Temp #	Description	Notes (PP = Photo Point)	Schedule Recommendations^a
CA-SBR-11991 CA-SBR-11992	Æ-Topock-131 Æ-Topock-132	Lithic assay station prehistoric cache; temporary camp	PP 118: Overview CA-SBR-11991/-11992 from pipeline access road (3844124/729619). PP 119–120: Overview CA-SBR-11991/-11992 from pipeline road (3844183/73006).	1
CA-SBR-11990H CA-SBR-13792H P-03-027678	Æ-Topock-130H Æ-Topock-141H —	Semicircular rock alignment; historic hunting blind, rock & retain walls/trails/cement footing/bedrock pits Old Trails Highway Arch Bridge	PP 121–123: CA-SBR-11990H/-13792H/-027678 below 3844207/730277.	1
CA-SBR-17221	Æ-Topock-185	Lithic assay/reduction station	PP 124: Overview CA-SBR-17221 from access road 3844295/730005.	1
CA-SBR-13796	Æ-Topock-147	AP 2: lithic scatter	Very limited access and distance from proposed work suggests removing from site assessment program. Future assessments should be from tanks with binoculars.	0
CA-SBR-11993 P-03-027648	Æ-Topock-133 —	Alcove archaeological site Topock Compressor Station Historic District	PP 125: Overview CA-SBR-11993 from across BCW 3844091/729346. Recommend using same photo point every year Remove from site assessment program.	1 0
CA-SBR-6693 ^b	—	Railroad bed and associated features	Remove from site assessment program.	0
AZ L:7:81 (ASM)	Æ-Topock-191	(56) AP 2: lithic scatter	PP 126: Overview AZ L:8:81 from fence 3844647/730472	1
AZ L:7:16 (ASM) AZ L:7:72 (ASM)	Æ-Topock-150/H Æ-Topock-15H	Complex lithic scatter/quarry with historical features 2,580-ft segment of NOTH	PP 127–130: Overview AZ L:7:16 & AZ L:7:72 from boulder at 3845322/731329.	1
AZ L:7:71 (ASM)	Æ-Topock-151	Lithic assay station	Access only by trespass on BNSF land prohibits inclusion in site assessment program. Agencies need to determine better access.	0
AZ I:14:334 (ASM)	—	Railroad	Access only by trespass on BNSF land prohibits inclusion in site assessment program. Agencies need to determine better access.	0

Table 3-1 (continued)
2017 Annual Site Condition Assessment Results

Trinomial or ASM #	Temp #	Description	Notes (PP = Photo Point)	Schedule Recommendations^a
AZ I:15:156	—	Active highway	PP 131–132: Overview AZ I: 15: 156 from 3846175/730990. Active highway removal from site assessment recommended.	1
CA-SBR-2910H ^b	Æ-Topock-152H	NOTH/U.S. Highway 66 ^b	PP 133–143: Various features of NOTH.	1
—	AE-Topock-199	Lithic scatters	PP 144–145: Overviews from opposite bank by consultants; not visited by other participants	1
—	AE-Topock-200			

a- 0 = remove; 1 = yearly; 2 = biennial; N/A = to be determined.

b- Consists of multiple features and segments covering much of project area not shown on map.

4

CONCLUSION AND RECOMMENDATIONS

In compliance with Groundwater FEIR Mitigation Measure CUL-1a-3a and Soil FEIR Mitigation Measure CR-2c, PG&E undertook the Annual Site Condition Assessment Program from November 6–9, 2017. The results of this effort are described in this report and summarized in Table 3-1 above, including observations resulting from the site inspections.

Field observations to date indicate no adverse impacts to any sites deriving from the Project's activities, as evidenced by the multiple site inspection efforts over the past many years. Participants noted new OHV tracks at site CA-SBR-11917 and in close proximity to other sites, but these derive from public access and not Project activities, and the Project does not involve use of OHVs. Appendix A includes an updated SCAR form for this site. No other SCAR forms required updating in 2017. Changes in the condition of resources can be wholly attributed to natural environmental processes and other ongoing non-Project-related human activity in the area.

PG&E implemented a modified site condition assessment strategy in 2017, focusing on documentation of access points into site locations from proposed remediation construction activities and taking into consideration Project Area changes posed by the draft SEIR. This strategy differed from past photo-documentation of actual archaeological resources except where participants noted changes in site condition. This new strategy also resolves concerns regarding monitoring personnel safety. Many sites are separated from active Project areas (or areas proposed for Project activities) by natural features such as steep-walled canyons, major roads and railways, and/or vegetation thickets (such as on the Arizona portion of the Project area). Thus, these sites are not readily accessible. Due to the various barriers mentioned above, and also steep slopes, unstable landforms, and other pronounced topographic features, attaining access to some sites poses a risk of injury to monitoring personnel, tribal representatives, and the other participants in the monitoring efforts. In addition, based on observations over the past 13 years, monitoring itself is the only human activity occurring at some sites, and thus the primary source of impact. In addition, a risk of damage to other sites is introduced by continuing attempts to reach particular sites. The monitors and their activity may attract the attention of visitors and users of the Project area to culturally sensitive areas they would not otherwise visit. A complete tabulation of information regarding the new set of photo-points and associated UTM coordinates will be developed following issuance of this report.

Of the 104 sites targeted for inspection in 2017, participants recommend 83 sites to the lead state and federal agencies for continued yearly condition assessments. As part of the 2017 site condition assessments, PG&E in collaboration with tribal monitors and representatives recommend either removal or less frequent field inspections for 20 specific sites due to various concerns. These recommendations are noted in Table 3-1. *Æ* concurs with these recommendations for a modified inspection schedule for these 20 sites. Participants defer recommendations for one site until an acceptable means of access is established.

5 REFERENCES

Bureau of Land Management

- 2012 *Cultural and Historic Properties Management Plan (CHPMP), Topock Remediation Project*. U.S. Department of the Interior, Bureau of Land Management, Lake Havasu, Arizona.
- 2017 *Programmatic Agreement among the Bureau of Land Management, Arizona State Historic Preservation Officer, California State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Topock Remediation Project in San Bernardino County, California, and Mohave County, Arizona*. Originally executed 4 October 2010; revised 2017.

California Department of Toxic Substances Control (DTSC)

- 2011 *Final Environmental Impact Report for the Topock Compressor Station Groundwater Remediation Project*. AECOM, Sacramento, California. Prepared for the California Environmental Protection Agency, Department of Toxic Substances Control, Sacramento.
- 2015 *Final Environmental Impact Report for the Topock Compressor Station Soil Investigation Project*. ESA, Los Angeles, California. Prepared for the California Environmental Protection Agency, Department of Toxic Substances Control, Sacramento.
- 2017 *Draft Subsequent Environmental Impact Report for the Pacific Gas and Electric Company Topock Compressor Station Final Groundwater Remediation Project*. ESA, Los Angeles, California. Prepared for the California Department of Toxic Substances Control, Sacramento.

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- 2013 *Topock Remediation Project Additional Soils Investigation: Condition Assessments at Fourteen Archaeological and Historical Sites*. Applied EarthWorks, Inc., Hemet, California. Prepared for Pacific Gas and Electric Company, San Francisco.

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- 2016a *Topock Compressor Station Remediation Project: 2015 Annual Archaeological and Historical Site Monitoring and Condition Assessments*. Applied EarthWorks, Inc., Hemet, California. Prepared for Pacific Gas and Electric Company, San Francisco.
- 2016b *Topock Compressor Station Remediation Project: 2016 Annual Archaeological and Historical Site Monitoring and Condition Assessments*. Applied EarthWorks, Inc., Hemet, California. Prepared for Pacific Gas and Electric Company, San Francisco.

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APPENDIX A

**Updated DPR 523 Site Record for CA-SBR-11973
(Appendix deliberately excluded from nonconfidential version)**