Topock Project Executive Abstract

Document Title:

Biological Completion Report for the Topock Remediation Project: Utility Potholing

Submitting Agency: BLM, USFWS

Final Document? ☒ Yes ☐ No

Date of Document: August 8, 2014

Who Created this Document?: (i.e. PG&E, DTSC, DOI, Other) – PG&E

Priority Status: ☐ HIGH ☐ MED ☒ LOW
Is this time critical? ☐ Yes ☒ No

Type of Document:
☐ Draft ☒ Report ☐ Letter ☐ Memo
☐ Other / Explain:

Action Required:
☒ Information Only ☐ Review & Comment
Return to: _____
By Date:_____
☐ Other / Explain:

What does this information pertain to?
☐ Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA)/Preliminary Assessment (PA)
☐ RCRA Facility Investigation (RFI)/Remedial Investigation (RI) (including Risk Assessment)
☐ Corrective Measures Study (CMS)/Feasibility Study (FS)
☐ Corrective Measures Implementation (CMI)/Remedial Action
☐ California Environmental Quality Act (CEQA)/Environmental Impact Report (EIR)
☐ Interim Measures
☒ Other / Explain: Programmatic Biological Assessment (PBA) General Project Management Measure 23

Is this a Regulatory Requirement?
☒ Yes
☐ No
If no, why is the document needed?

What is the consequence of NOT doing this item? What is the consequence of DOING this item?
This report is required by the approved PBA. Not performing the survey and preparing the report constitutes non-compliance with the PBA.

Other Justification/s:
☐ Permit ☐ Other / Explain:

Brief Summary of attached document:

The Biological Resources Completion Report for the Utility Potholing was prepared to determine if there were any adverse effects on species protected under the federal Endangered Species Act resulting from potholing activities to locate underground utilities in support of design for the final groundwater remedy at the Topock Compressor Station. The General Project Management Measures described in the PBA, and followed throughout the potholing activities were effective in minimizing impacts to the work area and surrounding lands. The project was conducted under a "may affect, but not likely to adversely affect" determination in the 2007 PBA for the southwestern willow flycatcher, Mojave desert tortoise, Yuma clapper rail, razorback sucker, and bonytail chub and under a "no effect" determination for the Colorado pikeminnow. In compliance with these determinations, there was no take of these species.

Written by: PG&E

Recommendations:
This report is a requirement of the PBA upon completion of construction activities.

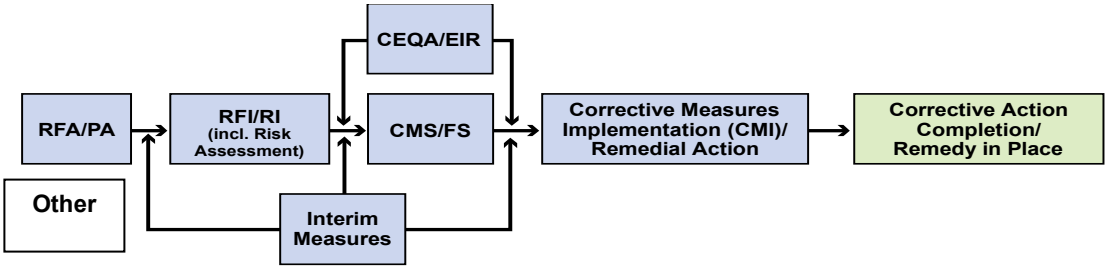
How is this information related to the Final Remedy or Regulatory Requirements:
This report details activities undertaken to support the final groundwater remedy design. .
.

Other requirements of this information?

None.

Related Reports and Documents:

Click any boxes in the Regulatory Road Map (below) to be linked to the Documents Library on the DTSC Topock Web Site (www.dtsc-topock.com).



Legend
RFA/PA – RCRA Facility Assessment/Preliminary Assessment
RFI/RI – RCRA Facility Investigation/CERCLA Remedial Investigation (including Risk Assessment)
CMS/FS – RCRA Corrective Measure Study/CERCLA Feasibility Study
CEQA/EIR – California Environmental Quality Act/Environmental Impact Report

Version 9

Pacific Gas and Electric Company®

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August 8, 2014

Ms. Kimber Liebhauser
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: *Biological Resources Completion Report for Utility Potholing, PG&E Topock Compressor Station, Needles, California*

Dear Ms. Wolfe-White and Ms. Marr:

This letter transmits the *Biological Resources Completion Report for Utility Potholing* at the Topock Compressor Station. This document is submitted in conformance with the January 2007 *Programmatic Biological Assessment for the Pacific Gas and Electric Topock Compressor Station Remedial and Investigative Actions* (PBA). This report has been prepared in compliance with the General Project Measure 23 of the PBA. This condition requires that a brief report discussing the mitigation measures implemented during the construction activities shall be prepared and submitted to the Bureau of Land Management and the U.S. Fish and Wildlife Service.

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

Sincerely,

Yvonne Meeks

Yvonne Meeks
Topock Project Manager

Enclosure

Biological Resources Completion Report for Utility Potholing, PG&E Topock Compressor Station, Needles, California

cc: Aaron Yue/DTSC
Amanda Dodson/ BLM

Biological Completion Report for the Topock Remediation Project: Utility Potholing

Prepared for
Bureau of Land Management
U.S. Fish and Wildlife Services

On behalf of
Pacific Gas and Electric Company

Potholing near Topock Compression Station

August 2014
WSA Technical Report No. 2013-61

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WSA

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ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
DOI	United States Department of the Interior
DTSC	Department of Toxic Substances Control
ESA	Endangered Species Act
FCR	Field Contact Representative
GPMM	General Project Management Measures
HNWR	Havasu National Wildlife Refuge
PBA	Programmatic Biological Assessment
PG&E	Pacific Gas and Electric Company
RCRA	Resource Conservation and Recovery Act
RFI/RI	RCRA facility investigation/CERCLA remedial investigation
USFWS	United States Fish and Wildlife Service

1.0 Introduction

Pacific Gas and Electric Company (PG&E) is addressing chromium in groundwater at the Topock Compressor Station (Station) located in eastern San Bernardino County, California, approximately 15 miles southeast of Needles, California. Figure 1 indicates the project area. As part of addressing the chromium groundwater contamination, PG&E has been conducting investigative and remedial activities at the Station and in the surrounding area.

Investigative and remedial activities are being performed under the Resource Conservation and Recovery Act (RCRA) corrective action process under an agreement between PG&E and the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), as well as under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) under an agreement between PG&E and the U.S. Department of the Interior (DOI). Under the terms of these agreements, PG&E is conducting the RCRA facility investigation/ remedial investigation (RFI/RI) to identify and evaluate the nature and extent of hazardous waste and constituent releases at the compressor station.

As part of the final groundwater remedy that is described in the 2014 Final Groundwater Remedy Programmatic Biological Assessment (PBA) (CH2M HILL, 2014), underground pipelines will be constructed to supply fresh water from Arizona. The current utility potholing activities are intended to accurately locate existing utilities within the proposed project areas and are covered in the 2007 PBA (CH2M HILL, 2007). Potholing activities followed all applicable General Project Management Measures (GPMM) in the PBA, the 2007 United States Fish and Wildlife Service (USFWS) letter of concurrence (USFWS, 2007), and applicable minimization measures in the adopted Mitigation Monitoring and Reporting Plan for the Topock Compressor Station Groundwater Remediation Project, dated January 2011 (DTSC, 2011).

To comply with these requirements, this report contains:

- Documentation of awareness training and compliance monitoring (Section 2).
- Project location and existing disturbed areas (Section 3).
- Pre- and post-activity surveys, including the observed listed species (Section 4).
- Conclusions, including a discussion of the effectiveness of the mitigation measures and recommendations for modifying the measures to enhance species protection (Section 5).

1.1 Regional Environmental Setting

The Topock Compressor Station is located in a sparsely populated, rural area. Much of the nearby surrounding land is publicly owned by the federal government and has important spiritual meaning to local Indian tribes. Public lands in the area are owned and/or managed by a number of federal and regional agencies, including the Bureau of Land Management (BLM), USFWS, Bureau of Reclamation, and San Bernardino County.

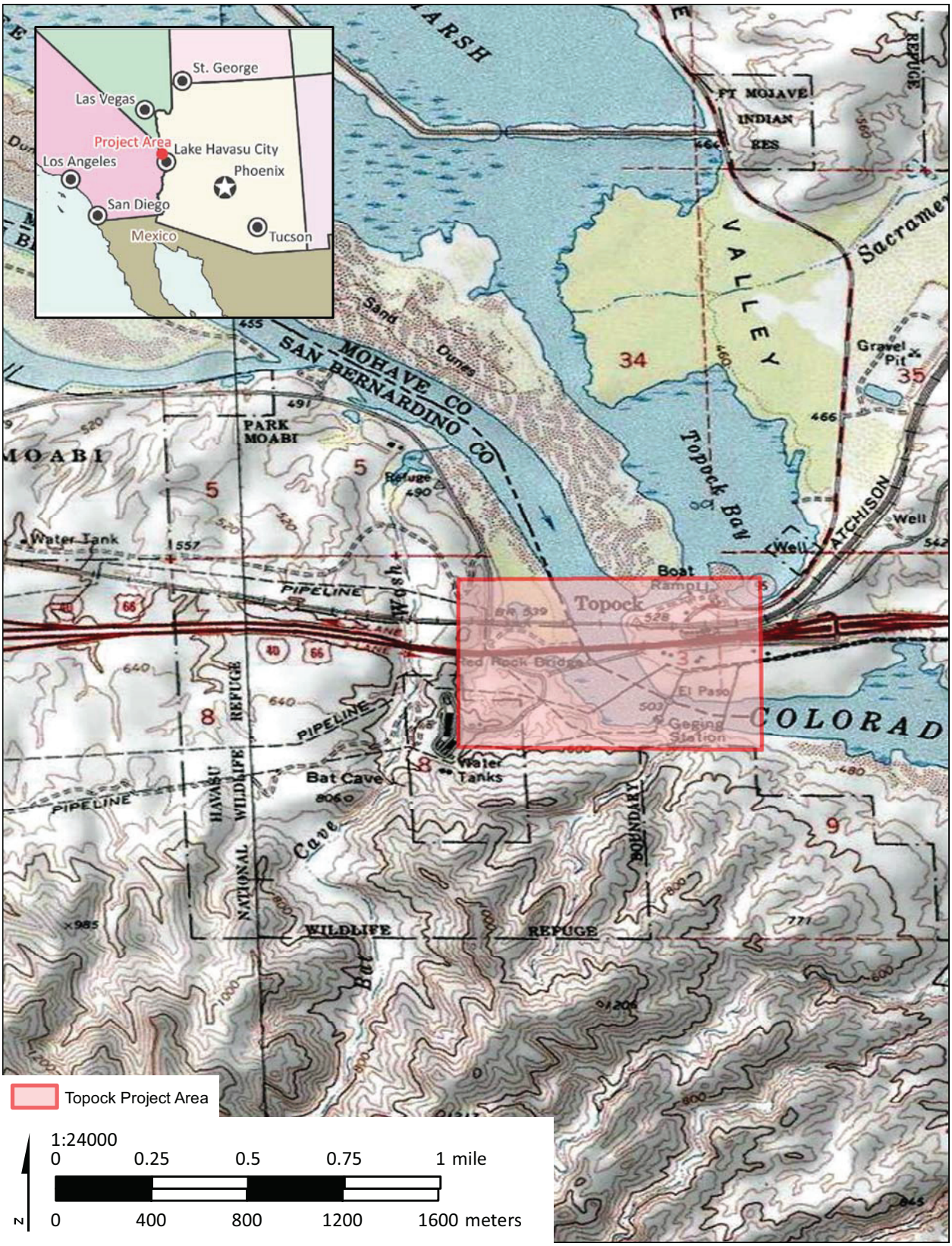


Figure 1. Project area containing potholing locations.

Dominant features of the area include the Colorado River to the east; the Chemehuevi Mountains to the south; the Burlington Northern Santa Fe railroad tracks and bridge; and Interstate 40, which links Barstow, California, and Topock, Arizona. Topography is rugged, ranging from an elevation of approximately 450 feet (137 m) at the Colorado River to over 1,200 feet (365 m) within 1 mile (1.6 km) to the south and southwest.

The area is characterized by arid conditions and high temperatures. The surrounding land consists of a series of moderately sized terraces with steep slopes dissected by desert washes. The project area is considerably eroded and is best described as badlands. Terraces are composed of homogenous rocky soils with very sparse vegetation. Structurally diverse vegetation in the project area is primarily limited to the Colorado River floodplain and the ephemeral washes.

1.2 Report Objectives and Organization

This Biological Completion Report documents field activities associated with performing potholing activities at 17 locations from June 11 to June 12, 2014.

The PBA (CH2M HILL, 2007) was prepared to determine any potential effect on species protected under the federal Endangered Species Act (ESA) resulting from remedial and investigative activities at the Topock Compressor Station. The USFWS concurred with the determinations provided in the PBA, as documented in a letter dated February 8, 2007 (USFWS, 2007). The field activities addressed in this report are included in the PBA; therefore, this report, as part of the PBA, serves as supporting documentation under the ESA for the evaluation of project effects to federally listed species and resulting determinations.

This report has been prepared in compliance with the GPMM 23 of the PBA (CH2M HILL, 2007). This condition requires that within 60 days of completion of construction activities, a brief report shall be prepared for the BLM and the Havasu National Wildlife Refuge (HNWR). This report shall document the effectiveness of the mitigation measures, make recommendations for modifying the measures to enhance species protection, and provide information on survey and monitoring activities, observed listed species, and the actual acreage disturbed by the project

To comply with these requirements, this report contains:

- Documentation of awareness training and compliance monitoring
- Project location and existing disturbed areas
- Pre- and post-activity surveys, including the observed listed species
- Conclusions, including a discussion of the effectiveness of the mitigation measures and recommendations for modifying the measures to enhance species protection

2.0 Awareness Training and Compliance Monitoring

In accordance with GPMM 5 described in the PBA, awareness training was provided to personnel before the start of potholing activities. WSA biologist, Gabriel Valdes, provided training to onsite personnel during the initial kickoff meeting held at the PG&E Topock Compressor Station on June 11, 2014. Training included a description of each species potentially affected by the project; its habitat, natural history, threats, and legal protection under the ESA; potential penalties; current survey findings; management; and protection measures in the PBA.

During project activities, designated Field Contact Representative (FCR), Gabriel Valdes, provided compliance monitoring. In accordance with GPMM 2, the FCR was responsible for overseeing compliance with the mitigation measures.

3.0 Project Location and Existing Disturbance

Proposed pothole locations were located throughout the project's Area of Potential Effect (APE), as defined in the PBA (CH2M HILL, 2007), on both the California and Arizona sides of the Colorado River.

3.1 Pothole Locations

Pothole locations were located over existing utilities for the following utility companies: PG&E, Transwestern Gas, Kinder Morgan, and electrical utility. Each pothole was located in a sparsely vegetated, previously disturbed area. Heavy equipment and vehicles were able to easily access the work areas without impacting surrounding vegetation.

Appendix A contains maps depicting the pothole locations listed in Table 1.

Table 1. Potholes for each utility company.

Utility Company	Pothole	Comments
Kinder Morgan	A1A	
Kinder Morgan	A1B	
PG&E	A3A	
PG&E	A3B	
Transwestern Gas	A4A	
Transwestern Gas	A4B	
Communications	A5	
Electrical	A6	
Kinder Morgan/Electrical	AZ1–AZ5	6 locations on private property
Transwestern Gas	AZ6	South of railroad
Electrical	AZ7	Near marina

Note: Pothole A2 was cancelled

4.0 Pre- and Post-Activity Surveys

4.1 Pre-activity Surveys

Prior to the start of potholing activities, USFWS-qualified biologist, Gabriel Valdes/WSA, surveyed the pothole locations and surrounding areas for sensitive biological resources. No listed species or nesting birds were observed during the pre-activity survey. The locations in the California portion of the project area are within the range of the Mojave desert tortoise (*Gopherus agassizzii*) and potentially suitable habitat is present in the project area. However, all locations were within previously disturbed areas which are sparsely vegetated with creosote bush (*Larrea tridentata*). Locations A3A and A3B were completed by hand digging with no disturbance to the surrounding vegetation. Locations A4A and A4B were completed using an extension hose from the vacuum truck. This avoided any disturbance or impact to the slope and surrounding vegetation.

The pothole locations in the Arizona portion of the project were located in heavily disturbed, sparsely vegetated areas. The six locations on private land (AZ1–AZ5) were not surveyed because access had not been granted. These locations are in developed areas and do not support intact habitat. No tortoises or other sign was observed near any of the pothole locations. Table 2 contains the list of plants occurring in the general area surrounding the pothole locations. No wildlife or their sign was observed.

Table 2. List of plants occurring near pothole locations during pre-construction surveys.

Common Name	Scientific Name
Creosote bush	*Larrea tridentata*
Honey mesquite	*Prosopis glandulosa*

4.2 Post-activity Surveys

Following pothole activities and demobilization, a post-activity survey was conducted by WSA biologist, Gabriel Valdes on July 9, 2014 to document field conditions at each of the pothole locations. No listed species were observed during the post-activity survey. All existing vegetation was avoided and remained intact at each location. All activities were confined to areas with pre-existing disturbance. Representative photographs of potholing in progress, pre- and post-activity conditions are provided as Appendix B.

5.0 Conclusion

In conformance with the PBA GPMM's, personnel were provided with awareness training, and a qualified biologist conducted pre- and post-activity surveys in all areas subject to potholing activities. The designated FCR remained onsite during all potholing activities.

The GPMM's described in the PBA were effective in minimizing impacts to the work area and surrounding lands. The project was conducted under a "may affect, but not likely to adversely affect" determination for the Mojave desert tortoise. In compliance with these determinations (CH2M HILL, 2007; USFWS, 2007), there was no take of desert tortoise or any other listed species during the utility potholing activities.

6.0 References

CH2M HILL

2007 *Programmatic Biological Assessment for Pacific Gas and Electric Topock Compressor Station Remedial and Investigative Actions*. CH2M HILL. Prepared for Pacific Gas and Electric, January 2007.Electronic document, http://dtsc-topock.com/documents/other-and-environment-impact-review/sitewide/biological-reports, accessed July 2014.

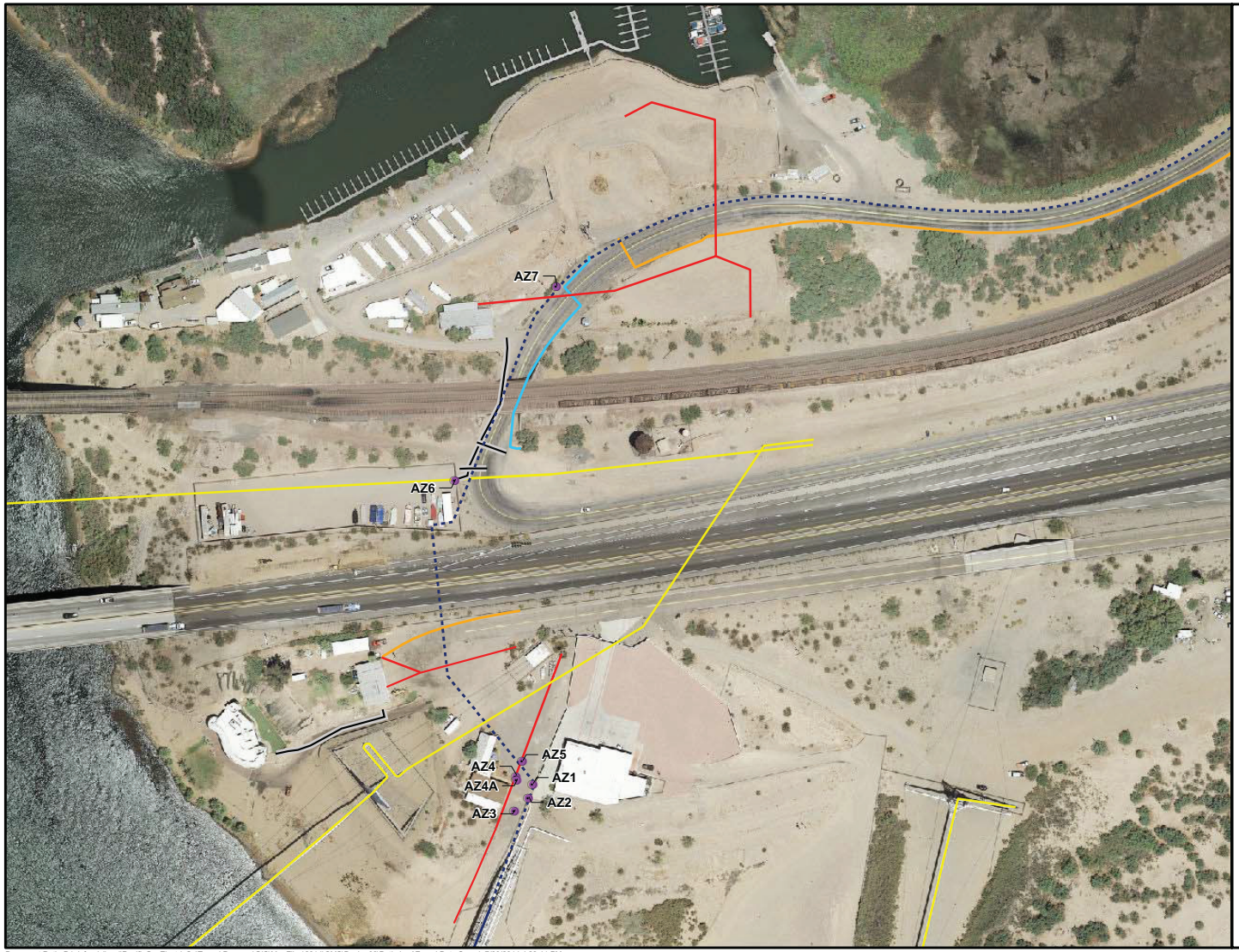
2014 Programmatic Biological Assessment for Pacific Gas and Electric Topock Compressor Station Final Groundwater Remedy. CH2M HILL. Prepared for Pacific Gas and Electric, April 2014. Electronic document, http://dtsc-topock.com/documents/other-and-environment-impact-review/sitewide/biological-reports, accessed July 2014.

U.S. Fish and Wildlife Service (USFWS)

2007 Letter to Field Manager, Lake Havasu Field Office, Bureau of Land Management. "Programmatic Biological Assessment for Pacific Gas and Electric Topock Compressor Station Remedial Investigative Actions, January 2007." Dated February 8, 2007. On file, Bureau of Land Management, Havasu Field Office, Lake Havasu, Arizona.

APPENDIX A.

MAPS DEPICTING THE LOCATION OF PROJECT POTHOLE LOCATIONS



LEGEND

- Pothole Locations

Pipeline Corridor for Remedy

- Aboveground Pipe
- Underground Pipe/Conduit

Utility Infrastructure

- CCTV
- Electric Line
- Gas Pipe
- Guy Wire
- Misc
- Overhead Electric
- Storm Drain
- Telephone Line
- Unknown Line
- Water Line

Results From 6-12-2014 Pot-holing		
Hole	**Type**	**Depth**
AZ1	Gas, Kinder Morgan ~30" steel	73"
AZ2	Gas, Kinder Morgan ~30" steel	64"
AZ3	Gas, Kinder Morgan ~30" steel	52"
AZ4	Electric, 3" conduit	42"
AZ4A	Unknown, 4" Iron pipe	34"
AZ5	Electric, 3" conduit	38"
AZ6	Gas, TransWestern ~24" steel	64"
AZ7	Electrical, multiple conduits	61"

N

0 50 100 200 Feet

FIGURE A-1
ARIZONA UTILITY POTHOLING LOCATIONS JUNE 2014
BIOLOGICAL COMPLETION REPORT
FOR THE TOPOCK REMEDIATION
PROJECT: 2014 UTILITY POTHOLING

CH2MHILL

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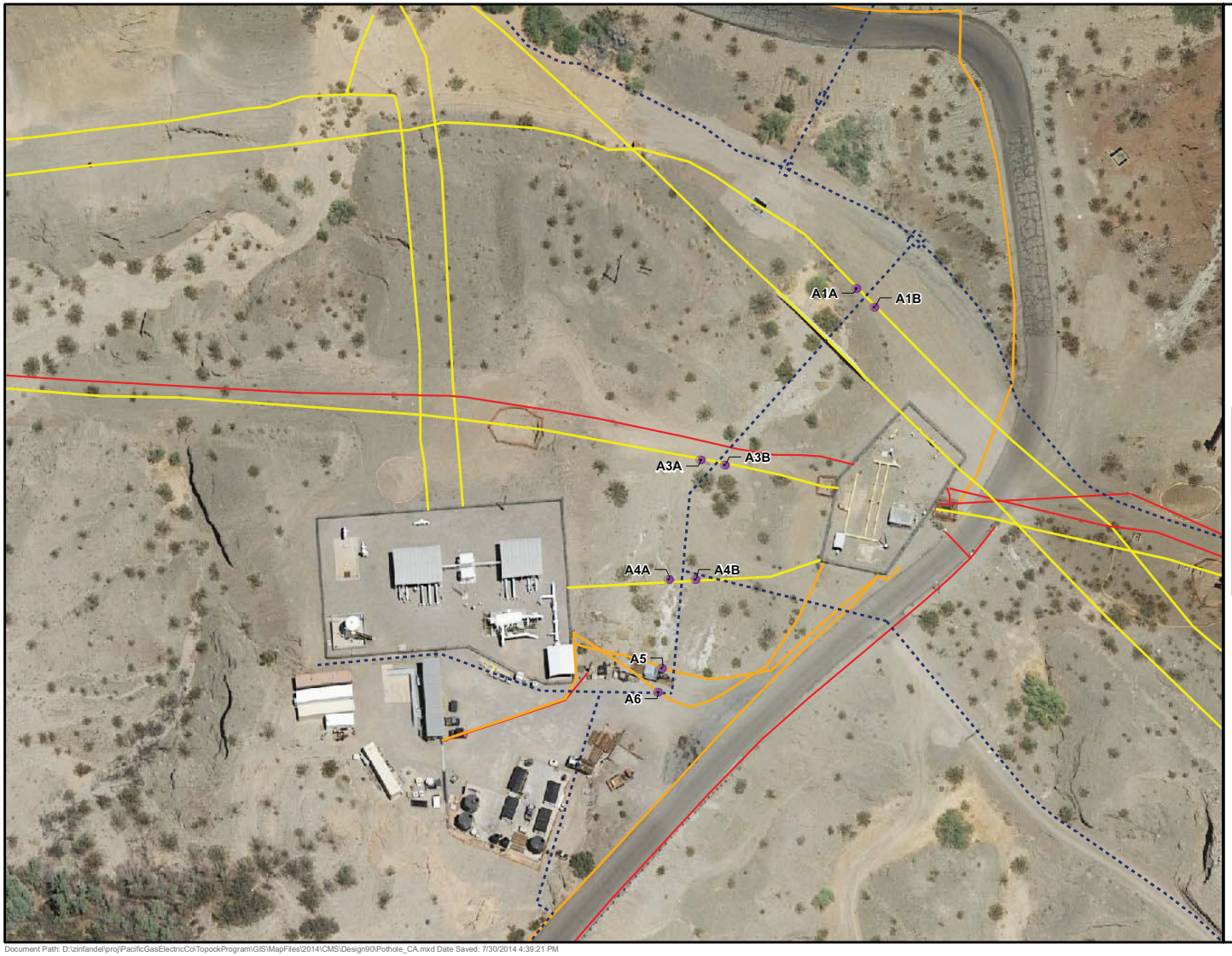

LEGEND

- Pothole Locations

Pipeline Corridor for Remedy

- Aboveground Pipe
- Underground Pipe/Conduit

Utility Infrastructure

- CCTV
- Electric Line
- Gas Pipe
- Guy Wire
- Misc
- Overhead Electric
- Storm Drain
- Telephone Line
- Unknown Line
- Water Line

Results From 6-12-2014 Pot-holing		
Hole	**Type**	**Depth**
A1A	Gas, Kinder Morgan ~30" steel	75"
A1B	Gas, Kinder Morgan ~30" steel	77"
A3A	Gas, PG&E ~30" steel	9"
A3B	Gas, PG&E ~30" steel	36"
A4A	Gas, Transwestern ~20" steel	63"
A4B	Gas, Transwestern ~20" steel	81"
A5	Communications, ~1.5" pvc	43"
A6	Electrical, ~1" pvc	19"

N

0 25 50 100 Feet

FIGURE A-2
CALIFORNIA UTILITY POTHOLING LOCATIONS JUNE 2014
BIOLOGICAL COMPLETION REPORT
FOR THE TOPOCK REMEDIATION
PROJECT: 2014 UTILITY POTHOLING

CH2MHILL

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APPENDIX B.

PROJECT PHOTOGRAPHS

LIST OF PHOTOS

Photo 1. Potholing activity at location A1B.

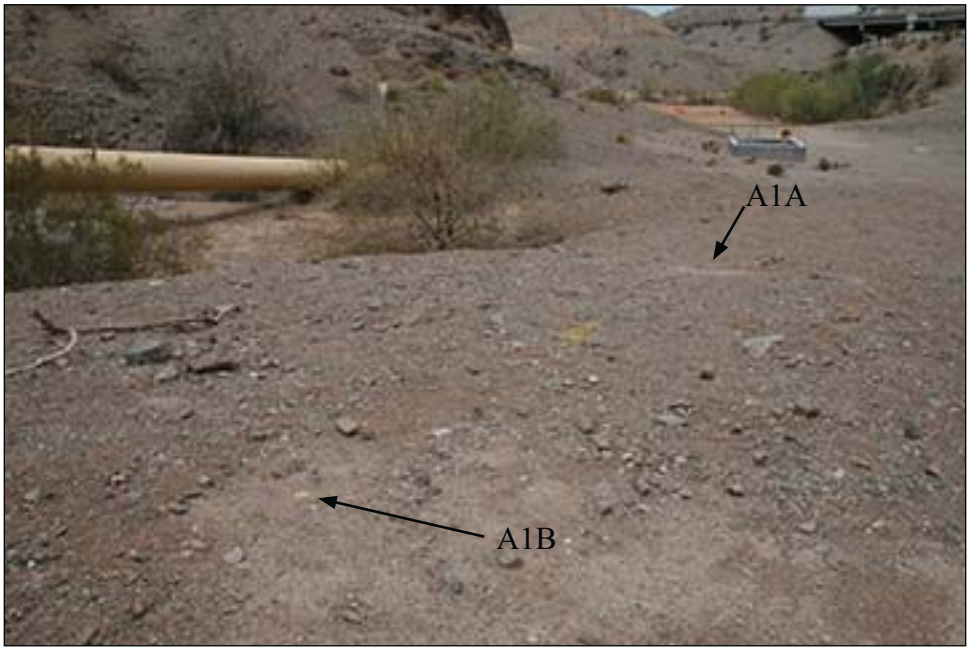

Photo 2. Post-activity photo of Pothole Locations A1A and A1B.

Photo 3. Manual excavation at Pothole Location A3B.

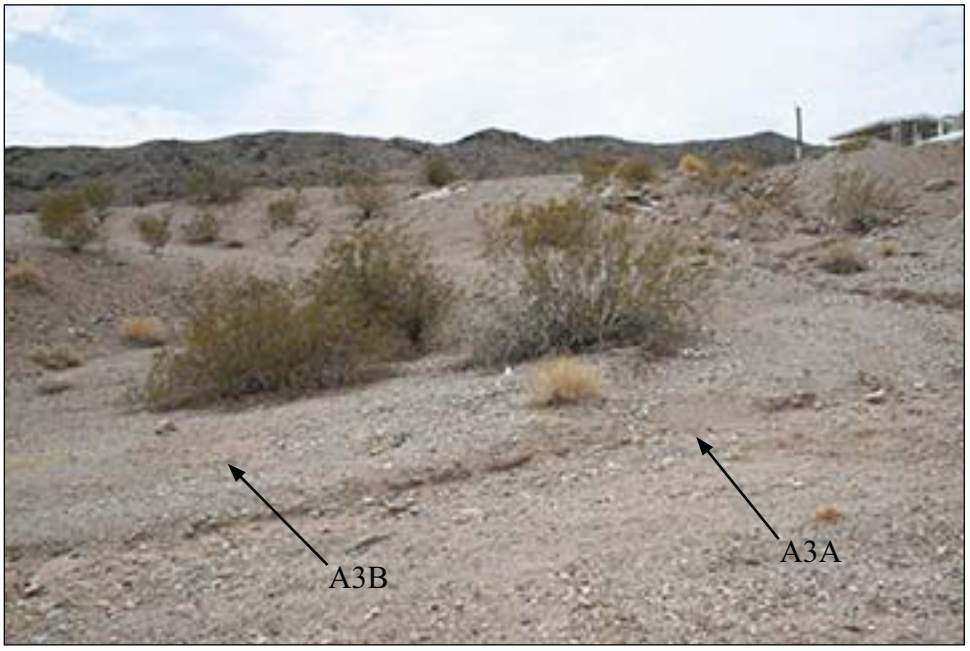

Photo 4. Post-activity photo of Pothole Locations A3A and A3B.

Photo 5. Potholing activity at Pothole Location A4A utilizing extension hose.

Photo 6. Post-activity photo of Pothole Location A4A.

Photo 7. Post-activity photo of Pothole Location AZ7 near marina. Surface conditions were not significantly altered by the potholing.

Photo 8. Post-activity photo of Pothole Location AZ6 south of railroad. Surface conditions were not significantly altered by the potholing.