



DOCKET 06-AFC-9	
DATE	AUG 28 2007
RECD.	AUG 30 2007

August 28, 2007

Mr. Brian Vierra
Regulatory Branch
U.S. Army Corps of Engineers
1325 J Street
Sacramento, California 95814-2922

**Re: SPK-200600897-SA
Colusa Generating Station Project
Update to 404 Permit Application**

Dear Mr. Vierra:

E&L Westcoast, LLC, has refined and revised the proposed Glenn-Colusa Canal Bridge replacement and road alignment for the Colusa Generating Station Project (Figure 1) to address recommendations by adjacent property owners. A full discussion of the new proposed bridge design is provided in the enclosed report entitled Proposed Modification to Glenn-Colusa Bridge design.

On behalf of E&L Westcoast, LLC, this letter summarizes the new design and provides revised estimates of the potential impacts and mitigation for the proposed project. These estimates replace the information provided in the submittals transmitted to the Corps on April 5, 2007 and May 24, 2007. The following components of the Standard 404 Permit Application have been revised to address the change in bridge design:

- Table 1 – Amount of Material Being Discharged into Each Habitat Type; and
- Table 2 – Impacts and Proposed Mitigation for Potential Jurisdictional Waters of the United States.

Revisions to these tables are shown in **bold** below.

URS Corporation
1333 Broadway, Suite 800
Oakland, CA 94612-1924
Tel: 510.893-3600
Fax: 510.874.3268
www.urscorp.com

Table 1 Amount of Material Being Discharged into Each Habitat Type		
Habitat Impacted	Area of Impact (acres)	Amount of Material (cubic yards)
Potential Jurisdictional Wetlands		
Permanent Impacts		
Glenn-Colusa Canal Bridge Replacement and Road Alignment- Freshwater Marsh	0.279	450.12
Glenn-Colusa Canal Bridge Replacement and Road Alignment- Seasonal Wetland	0.018	29.04
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Cultivated Rice Field	0.362	584.03
Temporary Impacts		
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Freshwater Marsh	0.120	193.60
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Seasonal Wetland	0.052	83.89
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Cultivated Rice Field¹	1.287	2076.36
Teresa Creek Bridge Replacement - Seasonal Wetland	0.023	37.11
Teresa Creek Bridge Replacement - Cultivated Rice Field	0.114¹	183.92
Potential Jurisdictional Non-Wetland Waters of the United States		
Permanent Impacts		
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Glenn Colusa Canal	0.029	280.72
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Irrigation Ditch	0	0
Teresa Creek Bridge Replacement - Perennial Stream	0.014	67.76
Temporary Impacts		
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Glenn Colusa Canal	0.006	0.74
Glenn-Colusa Canal Bridge Replacement and Road Alignment - Irrigation Ditch	0.214	690.51
Teresa Creek Bridge Replacement - Temporary Culverts Placed in Stream	0.040	193.60
¹ Per a previous conversation with the Corps temporary impacts to cultivated rice fields are not considered impacts to jurisdictional waters of the U.S.		

Table 2 Impacts and Proposed Mitigation for Potential Jurisdictional Waters of the U.S.				
Habitat Impacted	Area of Impact (acres)	Proposed Mitigation Ratio	Proposed Mitigation Acreage	Type of Mitigation
Potential Jurisdictional Wetlands				
Permanent Impacts				
Glenn-Colusa Canal Bridge Replacement – Freshwater Marsh	0.279	3:1	0.837	Off-site compensatory mitigation. ¹
Glenn-Colusa Canal Bridge Replacement – Seasonal Wetland	0.018	3:1	0.054	Off-site compensatory mitigation.²
Glenn-Colusa Canal Bridge Replacement – Cultivated Rice Field	0.362	1:1	0.362	Off-site compensatory mitigation.^{1,3}
Temporary Impacts				
Glenn-Colusa Canal Bridge Replacement – Freshwater Marsh	0.120	1:1	0.120	On-site restoration of affected area. ⁴
Glenn-Colusa Canal Bridge Replacement – Seasonal Wetland	0.052	1:1	0.052	On-site restoration of affected area.
Glenn-Colusa Canal Bridge Replacement – Cultivated Rice Field	1.287⁵	1:1	1.287	On-site restoration of affected area. ⁴
Teresa Creek Bridge Replacement – Seasonal Wetland	0.023	1:1	0.023	On-site restoration of affected area.
Teresa Creek Bridge Replacement – Cultivated Rice Field	0.114⁵	1:1	0.114	On-site restoration of affected area.⁴
Potential Jurisdictional Non-Wetland Waters of the United States				
Permanent Impacts				
Glenn-Colusa Canal Bridge Replacement – Glenn-Colusa Canal	0.029	--	--	Removal of existing bridge and piers.^{1,4}
Glenn-Colusa Canal Bridge Replacement – Irrigation Ditch	0	1:1	0	No mitigation necessary.^{1,4}
Teresa Creek Bridge Replacement – Perennial Stream	0.014	--	-- ⁶	On-site.^{1,4,6}

**Table 2
 Impacts and Proposed Mitigation for Potential Jurisdictional Waters of the U.S.**

Habitat Impacted	Area of Impact (acres)	Proposed Mitigation Ratio	Proposed Mitigation Acreage	Type of Mitigation
Temporary Impacts				
Glenn-Colusa Canal Bridge Replacement –Glenn-Colusa Canal	0.006	1:1	0.006	On-site restoration of affected area.⁴
Glenn-Colusa Canal Bridge Replacement – Irrigation Ditch	0.214	1:1	0.214	On-site restoration of affected area. ⁴
Teresa Creek Bridge Replacement – Temporary Culverts Placed in Stream	0.040	1:1	0.040	On-site restoration of affected area. ⁴

Notes:

- ¹ Resulting mitigation would be the greater amount for either impacts to giant garter snake habitat or jurisdictional wetlands, but not both.
- ² Compensation for impacts to seasonal wetlands would be consistent with the U.S. Fish and Wildlife Service (USFWS) Programmatic Formal Endangered Species Act Consultation on Issuance of 404 Permits for Projects with Relatively Small Effects on Listed Vernal Pool Crustaceans Within the Jurisdiction of the Sacramento Field Office, California. February 28, 1996. This compensation may be greater than the compensation indicated in this table. The USFWS 1996 programmatic agreement requires a 2:1 preservation ratio and a 1:1 conservation ratio. Under the USFWS 1996 programmatic agreement if any part of a pool that could potentially support listed branchiopods is destroyed the entire pool is directly affected. The total area of the two seasonal wetlands that would be impacted is 0.154 acres. Therefore, at least 0.308 preservation credits and 0.154 conservation credits are proposed to be purchased at a USFWS and ACOE approved mitigation bank.
- ³ Permanent impacts to these features would require additional offsite compensation consistent with USFWS Programmatic Formal Consultation for U.S. Army Corps of Engineers 404 Permitted Projects with Relatively Small Effects on the Giant Garter Snake within Butte, Colusa, Glenn, Fresno, Merced, Sacramento, San Joaquin, Solano, Stanislaus, Sutter and Yolo Counties, California. November 13, 1997.
- ⁴ Mitigation would be provided that is consistent with the USFWS 1997 programmatic consultation for giant garter snake.
- ⁵ Per a previous conversation with the ACOE, temporary impacts to cultivated rice fields are not considered impacts to jurisdictional waters of the U.S.
- ⁶ On-site mitigation consists of removing the existing Teresa Creek Bridge abutments. The existing Teresa Creek Bridge is approximately 31 feet long, while the new bridge will be 38 feet long. A longer bridge will set the bridge abutments bank an additional 3 feet, creating a wider channel. Removal of the abutments would increase the width of Teresa Creek by at least 0.014 acre.

Because the new bridge design does not affect any areas not already discussed and included in the Wetland Delineation previously provided to you for this project, we believe that the Corps concurrence with that delineation, dated August 10, 2007, does not need to be revised.

If you have any questions regarding this letter please contact Steve Leach at 510-874-3205 or Melissa Newman at 510-874-1747.

Sincerely,

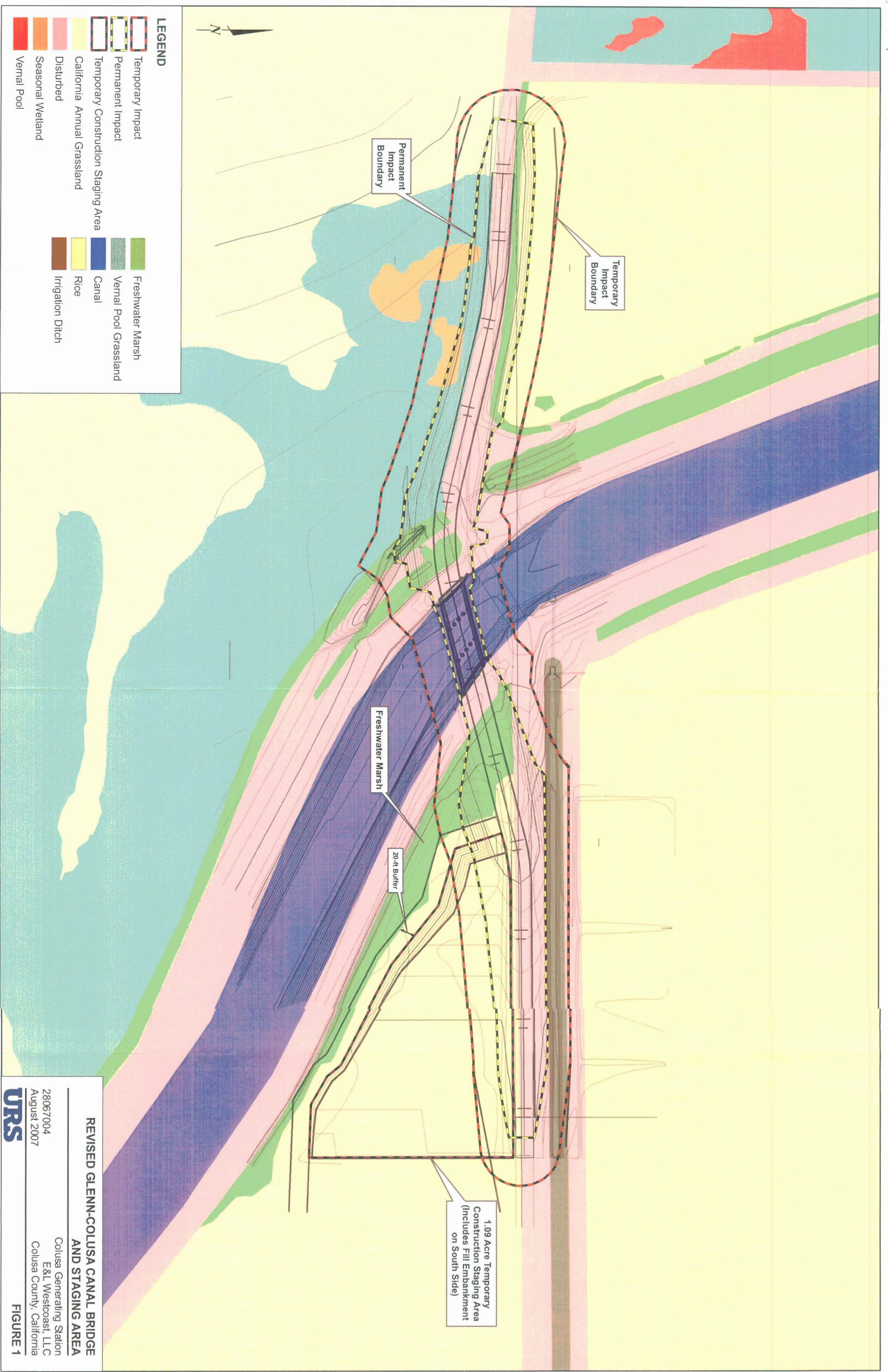
URS CORPORATION

Handwritten signature of Steve Leach, consisting of a stylized 'S' and 'L' followed by a horizontal line.

Steve Leach
Senior Biologist

Enclosure

cc: Andrew Welch, E&L Westcoast
Dale Shileikis, URS
Michelle Tovar, USFWS
John Mathias, CEC
Shahera Kelley, EPA
John Baker, NMFS



LEGEND

	Temporary Impact		Freshwater Marsh
	Permanent Impact		Vernal Pool Grassland
	Temporary Construction Staging Area		Canal
	California Annual Grassland		Rice
	Disturbed		Irrigation Ditch
	Seasonal Wetland		
	Vernal Pool		

REVISED GLENN-COLUSA CANAL BRIDGE AND STAGING AREA

28067004
August 2007

Colusa Generating Station
E&L Westcoast, LLC
Colusa County, California



FIGURE 1