

ENCLOSURE 3

From: [Jarrett, Patrick@Wildlife](mailto:Jarrett.Patrick@Wildlife)
To: [Marshall, Mary A](mailto:Marshall.MaryA@usbr.gov); [Young, Megan](mailto:Young.Megan@pge.com); [Bottaro, RJ](mailto:Bottaro.RJ@fws.gov); [Bratcher, Patricia \(Tricia\)](mailto:Bratcher.Patricia@fws.gov); [Kimberly Clements - NOAA Federal](mailto:Kimberly.Clements@noaa.gov); [Myers, Matt@Wildlife](mailto:Myers.Matt@wildlife.ca.gov); [Nguyen, Trang D](mailto:Nguyen.TrangD@usbr.gov); [Johnson, Matt@Wildlife](mailto:Johnson.Matt@wildlife.ca.gov); [Millsap, Stephanie D](mailto:Millsap.StephanieD@fws.gov)
Cc: [Barcellona, Jordan](mailto:Barcellona.Jordan@pge.com); [Smith, Jason](mailto:Smith.Jason@pge.com); [Walsh, Jon](mailto:Walsh.Jon@pge.com)
Subject: RE: [EXTERNAL] P1121- Marked Up and Clean Versions Rev 2 FMP
Date: Friday, July 19, 2024 12:35:33 PM
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Hi Megan,

CDFW does not have any additional comments and are providing concurrence to the Battle Creek Facility Monitoring Plan.

Thanks,
Patrick

Patrick Jarrett
Habitat Restoration Coordinator - Inland Fisheries
CA Department of Fish and Wildlife
Region 1 – Redding
(530) 782-4907

From: Marshall, Mary A <MMarshall@usbr.gov>
Sent: Thursday, July 18, 2024 8:29 AM
To: Young, Megan <MRY2@pge.com>; Bottaro, RJ <rj_bottaro@fws.gov>; Jarrett, Patrick@Wildlife <Patrick.Jarrett@Wildlife.ca.gov>; Bratcher, Patricia (Tricia) <patricia_bratcher@fws.gov>; Kimberly Clements - NOAA Federal <kimberly.clements@noaa.gov>; Myers, Matt@Wildlife <Matt.Myers@wildlife.ca.gov>; Nguyen, Trang D <trangnguyen@usbr.gov>; Johnson, Matt@Wildlife <Matt.Johnson@wildlife.ca.gov>; Millsap, Stephanie D <stephanie_millsap@fws.gov>
Cc: Barcellona, Jordan <JD1D@pge.com>; Smith, Jason <J8Sk@pge.com>; Walsh, Jon <JHWN@pge.com>
Subject: Re: [EXTERNAL] P1121- Marked Up and Clean Versions Rev 2 FMP

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Good morning, Megan,
The Bureau of Reclamation does not have any additional comments.

Thank you,
Mary

Mary Marshall

Battle Creek Restoration Project Manager
USDOI, Bureau of Reclamation
2800 Cottage Way, Sacramento, CA 95825
916-978-5248
mmarshall@usbr.gov

From: Young, Megan <MRY2@pge.com>

Sent: Thursday, July 11, 2024 4:53 PM

To: Bottaro, RJ <rj_bottaro@fws.gov>; Jarrett, Patrick@Wildlife <patrick.jarrett@wildlife.ca.gov>; Bratcher, Patricia (Tricia) <patricia_bratcher@fws.gov>; Kimberly Clements - NOAA Federal <kimberly.clements@noaa.gov>; matt.myers <matt.myers@wildlife.ca.gov>; Marshall, Mary A <MMarshall@usbr.gov>; Nguyen, Trang D <trangnguyen@usbr.gov>; Johnson, Matt@Wildlife <matt.johnson@wildlife.ca.gov>; Millsap, Stephanie D <stephanie_millsap@fws.gov>

Cc: Barcellona, Jordan <JD1D@pge.com>; Smith, Jason <J8Sk@pge.com>; Walsh, Jon <JHWN@pge.com>; Young, Megan <MRY2@pge.com>

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Good afternoon Battle Creek Resource Agency Members,

Attached for final review is the redlined and clean versions of the "Revision 2" of the Battle Creek Facility Monitoring Plan, in addition the comment matrix is attached. The redlined version incorporates edits received from USFWS, CDFW and BOR. I want to say a huge thank you to this group for the continued collaboration. The final FMP is due to FERC by 7/31/2024, it would be greatly appreciated if we could receive responses providing concurrence by 7/26 so they can be incorporated into the FERC filing.

Please feel free to reach out with any questions.

Thanks so much,

Megan Young

Sr. Hydro License Coordinator | Power Generation

Pacific Gas and Electric Company

m: (530) 364-6009 | e: megan.young@pge.com



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From: [Marshall, Mary A](#)
To: [Young, Megan](#); [Bottaro, RJ](#); [Jarrett, Patrick@Wildlife](#); [Bratcher, Patricia \(Tricia\)](#); [Kimberly Clements - NOAA Federal](#); [matt.myers](#); [Nguyen, Trang D](#); [Johnson, Matt@Wildlife](#); [Millsap, Stephanie D](#)
Cc: [Barcellona, Jordan](#); [Smith, Jason](#); [Walsh, Jon](#)
Subject: Re: [EXTERNAL] P1121- Marked Up and Clean Versions Rev 2 FMP
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Good morning, Megan,

The Bureau of Reclamation does not have any additional comments.

Thank you,

Mary

Mary Marshall

Battle Creek Restoration Project Manager
USDOI, Bureau of Reclamation
2800 Cottage Way, Sacramento, CA 95825
916-978-5248
mmarshall@usbr.gov

From: Young, Megan <MRY2@pge.com>

Sent: Thursday, July 11, 2024 4:53 PM

To: Bottaro, RJ <ry_bottaro@fws.gov>; Jarrett, Patrick@Wildlife <patrick.jarrett@wildlife.ca.gov>; Bratcher, Patricia (Tricia) <patricia_bratcher@fws.gov>; Kimberly Clements - NOAA Federal <kimberly.clements@noaa.gov>; matt.myers <matt.myers@wildlife.ca.gov>; Marshall, Mary A <MMarshall@usbr.gov>; Nguyen, Trang D <trangnguyen@usbr.gov>; Johnson, Matt@Wildlife <matt.johnson@wildlife.ca.gov>; Millsap, Stephanie D <stephanie_millsap@fws.gov>

Cc: Barcellona, Jordan <JD1D@pge.com>; Smith, Jason <J8Sk@pge.com>; Walsh, Jon <JHWN@pge.com>; Young, Megan <MRY2@pge.com>

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Thanks so much,

Megan Young

Sr. Hydro License Coordinator | Power Generation

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From: [Millsap, Stephanie D](#)
To: [Young, Megan](#); [Bottaro, RJ](#); [Jarrett, Patrick@Wildlife](#); [Bratcher, Patricia \(Tricia\)](#); [Kimberly Clements - NOAA Federal](#); [matt.myers](#); [Marshall, Mary A](#); [Nguyen, Trang D](#); [Johnson, Matt@Wildlife](#)
Cc: [Barcellona, Jordan](#); [Smith, Jason](#); [Walsh, Jon](#)
Subject: RE: [EXTERNAL] P1121- Marked Up and Clean Versions Rev 2 FMP
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Megan:

The revised document adequately addresses previous FWS comments. As such, FWS agrees that the Battle Creek Facility Monitoring Plan is ready to file with FERC.

Take care,
-Stephanie

>>> All calls to my office phone are being forwarded to my cellphone when teleworking. <<<

Stephanie Millsap, Ph.D.
Watershed Planning Division Manager
stephanie_millsap@fws.gov
916-930-2658
U.S. Fish and Wildlife Service
SF Bay Delta Fish and Wildlife Office
650 Capital Mall, Suite 8-300
Sacramento, CA 95814

From: Young, Megan <MRY2@pge.com>
Sent: Thursday, July 11, 2024 4:53 PM
To: Bottaro, RJ <rj_bottaro@fws.gov>; Jarrett, Patrick@Wildlife <patrick.jarrett@wildlife.ca.gov>; Bratcher, Patricia (Tricia) <patricia_bratcher@fws.gov>; Kimberly Clements - NOAA Federal <kimberly.clements@noaa.gov>; matt.myers <matt.myers@wildlife.ca.gov>; Marshall, Mary A <MMarshall@usbr.gov>; Nguyen, Trang D <trangnguyen@usbr.gov>; Johnson, Matt@Wildlife <matt.johnson@wildlife.ca.gov>; Millsap, Stephanie D <stephanie_millsap@fws.gov>
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Thanks so much,

Megan Young

Sr. Hydro License Coordinator | Power Generation

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From: [Kimberly Clements - NOAA Federal](#)
To: [Young, Megan](#)
Cc: [RJ Bottaro \(rj_bottaro@fws.gov\)](#); [Jarrett, Patrick@Wildlife](#); [Bratcher, Patricia \(Tricia\)](#); [Matt Myers](#); [Marshall, Mary A](#); [TrangNguyen@usbr.gov](#); [Johnson, Matt@Wildlife](#); [Millsap, Stephanie D](#); [Barcelona, Jordan](#); [Smith, Jason](#); [Walsh, Jon](#); [William Foster - NOAA Federal](#); [Stacie Smith - NOAA Federal](#)
Subject: Re: P1121- Marked Up and Clean Versions Rev 2 FMP
Date: Tuesday, July 23, 2024 12:30:20 PM
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Good afternoon Megan,

Thanks for the opportunity to review. NMFS does not have any additional comments and also concurs with PG&E filing the Battle Creek Facility Monitoring Plan with FERC.

On Thu, Jul 11, 2024 at 4:56 PM Young, Megan <MRY2@pge.com> wrote:

Good afternoon Battle Creek Resource Agency Members,

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Please feel free to reach out with any questions.

Thanks so much,

Megan Young

Sr. Hydro License Coordinator | Power Generation

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Article 406

Facilities Monitoring Plan Round 2

Comments Tracking

Reference #	Agency	FMP Reference	Comment	PG&E Comments
1	USFWS	3.1 MOU Flows	So how is this going to work? Stop the diversion at NFFD and all flows go down the creek? Also is there a reason why the saxophone could also not possibly be used? or shouldn't be mentioned as a way to get more water?	Spills at the Saxophone are not operationally feasible, due to both equipment and resources. Also poses potential license compliance issues with ramping rate requirements. (ops model in EREIS 2014)
2	USFWS	3.2 Eagle Canyon DD	How are we going to accomplish this? Would we go out with a hydrologist right below ECD, complete a stream profile and compare that data to the real time data at CB-112. It seems like this would have lots of variables and have to be done multiple times a year to see different rates of spring influences.	PG&E doesn't utilize spring flow to account for IFR.
3	USFWS	3.2 Eagle Canyon DD	This may also involve assessing the spring system overall, which may or may not be affected by other PG&E infrastructure, changes to the landscape that would need to be accounted for (e.g. the impacts of a fire, etc.), so in summary, monitoring of the spring system is needed.	PG&E intends to pass all spring flow
4	USFWS	3.2 Eagle Canyon DD	If accuracy is unknown, then what is the benefit of assessing stage as currently described? Consider tying this to either another gauge or monitoring element that may allow for some level of interpretation of stage information above 90 cfs. Because higher flows may have an impact on meeting fish passage criteria at this site (unless I'm mistaken), it behooves PG&E to identify conditions under which fish passage structures are not functioning.	Cannot verify fish passage under higher flows since we have not witnessed fish passage.
4	USFWS	3.3 Mainstem BC	I apologize for not knowing the geography well--what is the distance between these two discharges? If it is quite a distance, do we know at what flows stranding becomes a problem and/or have information on instream geomorphology to know when instream flows do not meet fish passage criteria? That can be rectified by assessing critical riffles (one methodology, at least) at different flows, if this area is accessible.	.7 miles from forebay discharge point to the tailrace discharge point.
5	USFWS	4.3 Coleman DD	What is the impetus behind the revision, and what is the schedule for said revision, if the dam is to be removed in 2026?	Originally Phase 2 of the reclamation project included a tailrace connector from Inskip =
6	USFWS	5.4 Upstream Water Users	How is this documented and/or the evidence to show the level of impact? I understand the acknowledgement here of something going on, but it would help to provide more information and/or proof of the level of impact.	RR exceeded below NFFD without PG&E operational changes. Proof of exceedence can be seen in stage fluctuation.
7	USFWS	8.12.3 Fish Screen & Bypass Stop Logs	There was a recent update to NMFS fish passage criteria; am wondering what was used to identify these requirements and if they meet current NMFS and CDFW criteria.	When the facilities were tested all fish passage criteria met the appropriate standards at the time.
8	USFWS	9.1 Fish Ladder	Are there records kept of the inspection(s)? That is typical SOP.	Yes, records of each inspection will be kept
9	BOR	TOC	General Comment - consider moving NBCFDD Section 8 & 9 and ECDD Section 10 & 11 as their own Appendix and have a generalize FMP Section that summarizes an overview of the site control, fish screens and ladders operation, and then refer to the new Appendix for more details. Appreciate PG&E effort to pull in good and helpful information to understand the canal diversion, fish screens and fish ladders operation and detail of the gages and sensors, however some of the details and the in-depth of the maintenance and inspection of each facility component are not necessary for the "monitoring" intention of the FMP, rather they are more applicable to include in the DOC and SOP.	For now PG&E will be leaving section 8-11 as is. The SOP's are living documents and will be updated during the adaptive management phase.
10	BOR	TOC	Fix Section 4 of TOC. The paragraph should be deleted.	Noted
11	BOR	TOC	Otherwise for consistency use IFR, as defined in Section 2 and delete MIF in the rest of doc.	Noted
12	BOR	2.1	Appendix A and these diagrams are not listed in the Table of Content and missing from the document.	Diagrams have been added to the appendix and will be added to the final document.
13	BOR	Table 2-1	Deleted the 24 hours since it's superseded by 48 hours per FERC License Amendment Order for Phase 1B, dated 5/21/2010, where it described (F) Under Article 33 of the license, as amended on August 25, 2010, footnote Number 9 of the table titled "Minimum Instream Flow Release by Month" is hereby amended to conform to the Water Quality Certification issued on December 9, 2008.	Noted, "24" deleted. Edits made to #7 will not be accepted as that is exact language from the 2009 Phase 1A amendment.
14	BOR	3.1	Do you mean gage data listed below in Table 3-1?	Noted, edit made
15	BOR	Table 3-1	The footnote # is incorrectly listed in CB-112 row.	Noted
16	BOR	5.1.2	Update Diagram 4, last version shared with Agencies in 2023, shows CBX. Confirm installed location and update the CB-119 numbering.	

17	BOR	5.1.3	It appears this section title is error. Should be Coleman Canal since CB-110 is referenced for stage monitoring. A separate section for Eagle Canyon Canal is needed and to reference Diagram 5 and CBX. Eagle Canyon Canal ramping rate requirements should still apply, even after Coleman Diversion Dam is removed -- as flows can still be diverted through Inskip Powerhouse penstock bypass into Coleman Canal and Coleman Powerhouse for generation (at least until PG&E go through the full Battle Creek Hydroelectric Project decommission).	Title edit made. Eagle Canyon Canal paragraph has been added. Once Coleman Diversion Dam is removed, flows diverted from the NF will not be enough to effectively operate the unit. Therefore, once Coleman Diversion Dam is removed, PG&E anticipates removing Coleman PH from service.
18	BOR	7.1	In the Feb 2014 Phase 2 No Regrets WQC, it's Condition 10 - Ramping Rates that has this 460 cfs threshold. Suggest just stating WQC, not specify which condition since the condition # is different in Phase 1A/1B and 2 WQCs.	Noted, edit made
19	BOR	Figure 8.1	Suggested edits to Figure 8-1 labels and legend: Volta 2 Powerhouse (to distinguish it's #2 not Volta 1), Pedestrian Bridge, North Fork Battle Creek (Creek)	Noted
20	BOR	Figure 8.2	Label the Bypass. Also note this plan view is only showing the fish ladder with 7 pools, instead of 10 pools.	Noted
21	BOR	8.1	Delete, duplicate info covered in Section 8.3.	Noted
22	BOR	8.1	Delete since it repeats Section 8.1, paragraph 3	Noted
23	BOR	8.3	Delete, Figure 8-3 is duplicate of Figure 8-2. Also update the sequential figures that come after and where they are referenced.	Noted
24	BOR	8.3	The NBCFDD DOC utilized the term "Fish Screen Bypass". The bypass is generally used by but not limited to juvenile since on occasion adult fish can enter the bay.	Will remove reference to "Juvenile Bypass" and replace with "Fish Screen Bypass"
25	BOR	8.6	Since Site RTU is one component of the Site Control System should it be Subsection 8.5.1?	PG&E terminology is consistent
26	BOR	8.7	Since PG&E SCADA RTU is one component of the Site Control System should it be Subsection 8.5.2?	PG&E terminology is consistent
27	BOR	8.11	This statement is subjective. In the 2022 PG&E Issues Table, Reclamation had explained the MOU definition of "Fail-Safe Fish Ladder" and "Fail-Safe Fish Screen", in which the 2018-2019 facility startup testing proved the automation program logic worked -- automatically shut off the diversion when conditions (like flood flows, screens clogging, or not meeting the IFR requirements) are observed. What has been challenging are the sensors malfunctioning and debris load maintenance. Suggest revising the sentence as: The below operations were tested and the facility automation proved to be fail-safe, however the reliabilities of some sensors and the fish screen brush cleaner to keep up with the debris loads are still challenging.	PG&E disagrees, although sensor malfunctions and debris loading have been issues the overall SCADA logic has also been proven during recent functional testing to have been an underlying problem.
28	BOR	8.11	Table 8.3 are based on the 2015 DOC theoretical procedures. There are additional tested & recommended fish ladder settings for the orifice slide gates at low to normal hydraulic conditions, found in Reclamation Technical Memorandum PAP-1176, <i>NFSL Hydraulic Evaluation</i> , August 2019 and the <i>NBCFDD Fish Facility Summary of Operation Guidance, Updated August 2022</i> .	Noted
29	BOR	8.12	Delete or fix the reference error.	Noted
30	BOR	8.12	Update ref field to Section 9.2.5	Noted
31	BOR	8.12.2	Delete this paragraph, as it's duplicate and more appropriate info in Section 9.2.5.	Noted
32	BOR	8.12.2	For key messages, use consistent font style (select either red color and/or all capital) in Section 8.12.2, 9.2 and 9.2.5 and Section 9.2.9.1 and in Section 10 and 11.	Noted
33	BOR	8.12.3	Update ref field to Section 9.2.5	Noted
34	BOR	8.13	Merge this section & delete duplicate info with Section 8.5 Site Control System and Section 8.6 Site RTU.	Noted
35	BOR	9.2	Update ref field to Section 9.2.1 and 9.2.3	Noted
36	BOR	9.2.2	Update ref field to Section 9.2.3	Noted
37	BOR	9.2.9	This statement is not clear, is the intention to dewater the Bypass Drop Box for maintenance? If so, the only way to block flow through the Headworks and Fish Screen Bay is to close the Canal Gate. The Canal Stop Logs are behind the fish screen, so flows will still go into the Bypass Box when the Canal Gate is open.	Noted, will need to confirm what maintenance this is describing.
38	BOR	10.1	Figure 10-1 and 10-2 are the same. For consistency, Figure 10-1 can be the aerial photo with ECDD important features, like NBCFDD Figure 8-1.	Noted
39	BOR	10.1	Like the above comments in Section 8.1, suggest making this ECDD introduction section more generalized and pull the details of each feature in Section 10.2 under their perspective components. This organizes the info and minimizes the repetition (e.g. fish ladder details are repeated here and in Sec 10.2, diversion dam is repeated in Section 10.3).	Noted
40	BOR	10.5	Missing Radial Gate from this list (mentioned in the intro paragraph Sec10.5 and in 10.5.6.	Noted

41	BOR	10.8	Same as NBCFDD, the ECDD DOC utilized the term "Fish Screen Bypass". The Bypass is generally used by but not limited to juvenile since on occasion adult fish can enter the bay (the secondary trashracks has 9"x18" openings to allow for adult passage).	Will remove reference to "Juvenile Bypass" and replace with "Fish Screen Bypass"
42	BOR	10.9.3	Most of this info is duplicate of Table 10-1. Consider deleting this part and add the not-duplicated info in CB112 and CB43 pressure transducer in the Table.	Noted
43	BOR	10.9.4-10.9.5	These should be subsection 10.9.3.1 and 10.9.3.2 as the level sensors and bubbler are part of the overall water level monitoring system.	Noted
44	BOR	10.1	This statement is subjective. In the 2022 PG&E Issues Table, Reclamation had explained the MOU definition of "Fail-Safe Fish Ladder" and "Fail-Safe Fish Screen", in which the 2018-2019 facility startup testing proved the automation program logic worked -- automatically shut off the diversion or the Facility when conditions (like flood flows, screens clogging, or not meeting the IFR requirements) are observed. What has been challenging are the sensors malfunctioning and debris load maintenance. Suggest revising the sentence as: The below operations were tested and the facility automation proved to fail-safe, however the reliabilities of some sensors and the fish screen brush cleaner to keep up with the debris loads are still challenging.	PG&E disagrees, although sensor malfunctions and debris loading have been issues the overall SCADA logic has also been proven during recent funtional testing to have been an underlying problem.
45	BOR	12.3	Since PG&E is putting in new video camera system -- these criteria may be outdated (CDFW furnished to DWR in the original NFSL design pre- 2010). Suggest noting these criteria may be updated and PG&E will coordinate with Fisheries to confirm proposed (more current industry type) equipment is acceptable. Section 12.2, paragraph 1 appears to imply this approach. The comment is mainly about making sure what you're listing (which are copied from the NBCFDD and ECDD DOCs) for each facility video monitoring system criteria are still relevant.	Pacific States Marine Fisheries will be performing this task for PG&E.
46	CDFW	Table 2-1 (5)	Are springs actually included in the instream flow release requirement? How is PG&E measuring the Eagle Canyon Springs volume?	No, spring flows are not included in the instream flow requirement.
47	CDFW	3.2	Does this mean the installation of new stream gage?	No new stream gage will be installed. Sentence deleted.
48	CDFW	8.3	Is there a routine inspection of the JB Plunge Pool?	Inspections are will be performed on an annual basis during annual maintenance. Maintenance activities will follow procedure included in SOP.
49	CDFW	9.2.9.1	How frequently will the plunge pool be inspected. More frequent when fish are expected to be present.	PG&E will try to complete maintenance activities when fish are not present in an effort to reduce potential impacts.
50	CDFW	11.1.3	What is the regular inspection interval?	Video crew will be there once to twice a week. Ops inspections will be performing inspections as well, so inspections will occur a few times a week
51	NMFS	General	Would it be possible to maintain or replace gauging stations CB-108 and CB-110 after the dams are removed to monitor flows (in support of false attraction study) in the South Fork? This is most critical for the reaches from Inskip to Coleman and top reach of mainstem. NMFS will help PG&E develop a basic fish rescue plan with the fish agencies that would include points of contact for PG&E to reach out/report to in the event stranding occurs. I will continue to work on the permitting pathway with CDFW/USFWS for direct handling of ESA listed fish.	CB 110 will remain functional and will remain in its location just downstream of Coleman Diversion Dam on the South Fork. PG&E has a project in place to move CB 108 during the Inskip Diversion Dam removal project. PGE& will work with the agencies to develop a fish rescue procedure, which will include proper contacts and protocols.
52	NMFS	13.1.1	Is the agreed upon criteria included somewhere in the FMP? And does (or should) this criteria include capturing the potential for an increase in frequency of planned outages/ramping if mitigation for false attraction flows on South Fork are implemented as part of post Phase 2 operations? This would not be required if monitoring determines it is not a significant issue for adults, and monitoring would not occur until Coleman Diversion Dam is removed. Previously consulted on ramping rates (0.10/ft/sec) would still apply. I do see language speaking to "forced" or "scheduled" outages on page 20 under "License Requirements" for canals. Maybe this would suffice?	Lanugage as been edited to say "outage schedules" instead of criteria.

53	NMFS	13.1.1	"Resource agencies will be notified as soon as possible when the following occurs: (page 102) possible fish stranding NMFS response: We need to quantify "as soon as possible" for observed fish stranding events. Can this be modified to say within the first 24 hours? Even though this sounds unlikely to occur, response time is critical for fish rescues. The guidance on how to report and list of fish agency contacts can be included in the fish rescue plan we will help PG&E develop.	language changed to "resource agencies will be notified within 24 hours of observing a fish stranding event"
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