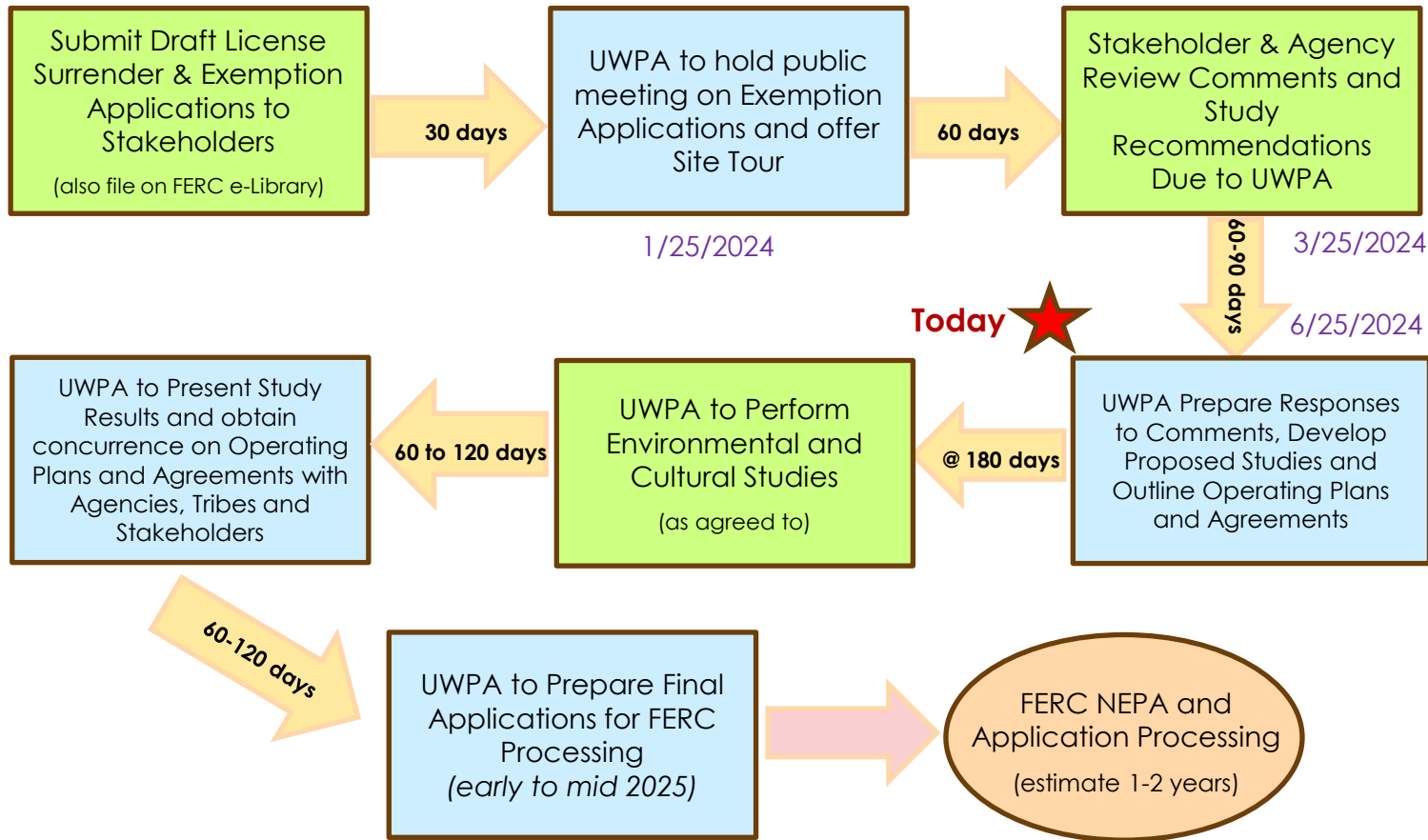


FERC Conduit Exemption Applications Summary of Ongoing Activities

-
- FERC Conduit Exemption Applications
 - UWPA filed Draft CE Applications in December 2023
 - Four (4) entities filed comments with FERC (requesting studies)
 - SWRCB, USFS, CDFW, and CSPA
 - USFS Special Use Authorization Process
 - Required for occupation of USFS lands (Utica Project)
 - Application is being prepared
 - SHPO Cultural Resources Section 106 Consultation
 - Consultation has been initiated, scope of work being developed
 - Environmental Studies
 - Team is evaluating comments, preparing recommendations
 - Following slides provide additional details

FERC Conduit Exemption Application UWPA Timeline and General Process



Summary of Key Studies Being Requested

#	Study	Description
1	Foothill Yellow Legged Frog (FYLF)	Listed species; CDFW requested data to determine the presence of FYLF: multiple life stages; 3 to 4 sampling events in 2024.
2	Red Legged Frog (RLF)	Listed species; CDFW noted RLF may be present and requested data collection. Could coordinate with FYLF surveys.
3	Western Pond Turtle (WPT)	Proposed for listing; CDFW noted WPT may be present & requested data. Coordinate with FYLF/RLF surveys. Previously noted in 2006.
4	Fish Studies (trout, catfish, etc.)	CDFW requested data on fish populations in project area. Limit surveys to electro-fishing and observations; where possible.
5	Water Quality	SWRCB requiring initial study (401 WQ cert & CEQA); wet season/dry season sampling; may require long-term monitoring.
6	Benthic Macro-invertebrate (BMI)	CDFW requested data to assess health of fish populations; SWAMP protocol generally required by SWB for 401 WQ Cert.
7	Aquatic Invasive Species (AIS)	CDFW requested data to assess mollusc species. Address thru WQ studies and eDNA surveys (amphibians/reptiles) or observations.
8	Wildlife Entrapment (Canals/Flumes)	CDFW requested data on wildlife entrapment in canals/flumes. Limit to visual inspections; document as part of O&M activities.
9	Instream Flow Study	CDFW implied this could be a required study, based on results of fish surveys. Use previous PG&E studies; avoid if possible.
10	SHPO Section 106 Studies & Reporting	This effort will include studies that lead to an updated Historic Properties Management Plan. Required action.

Potential Studies and Cost Ranges

#	Study Description	Recommended (yes/no/modify)	Low Range	High Range	Additional Comments
1	Foothill Yellow Legged Frog (FYLF)	Yes	\$ 75,000	\$ 175,000	Recommend phased approach for implementation
2	California Red Legged Frog (CRLF)	Modify	\$ 10,000	\$ 30,000	more data required, add on to FYLF study
3	Western Pond Turtle (WPT)	Modify	\$ 10,000	\$ 50,000	eDNA, if it becomes an issue, include trapping.
4	Fish Studies (trout, catfish, etc.)	Yes	\$ 75,000	\$ 150,000	Recommend electro-fishing; avoid snorkel surveys
5	Water Quality	Yes	\$ 100,000	\$ 250,000	Required study 401 WQ cert; wet season/dry season sampling
6	Benthic Macroinvertebrate (BMI)	No to Modify	\$ 10,000	\$ 150,000	SWAMP protocol study; if needed, perform w/ other field work
7	Aquatic Invasive Species (AIS)	No to Modify	\$ 5,000	\$ 50,000	Address this through WQ studies; adjacent observations
8	Wildlife Entrapment (Canals/Flumes)	Modify	\$ 5,000	\$ 50,000	Limit to visual inspections of canals/flumes; O&M reporting
9	Instream Flow Study	No	\$ 100,000	\$ 400,000	Can previous (PG&E) studies be used? Costly, avoid if possible.
10	SHPO Section 106 Studies & Reporting	Yes	\$ 150,000	\$ 350,000	Attempt to use existing data as much as possible
			\$ 540,000	\$ 1,655,000	
* Costs are approximate; may be higher based on agency requirements (i.e., Take Permits, sampling procedures).					

Study Recommendations

-
- A. FYLF (w/ RLF and WPT) Surveys - **recommended**
 - Phased approach w/ overlapping RLF and WPT sampling, if possible
 - B. Fish Surveys - **recommended**
 - Fall sampling; one year only; plan to use fishery condition to determine need for BMI sampling. However, SWRCB may require BMI for 401 Cert (likely a September survey).
 - C. Water Quality (Required for 401 WQ Cert) - **recommended**
 - Limit to required WQ constituents; include sampling to support AIS assessment.
 - Anticipate SWRCB requests 2 seasons, spring runoff/summer dry season.
 - D. Benthic Macroinvertebrate (BMI) - **not recommended or a modified version**
 - E. Aquatic Invasive Species (AIS) – **not recommended or a modified version**
 - F. Wildlife Entrapment Survey – **recommended**
 - Streamline study, develop for long-term O&M actions
 - G. In-Stream Flow Study – **not recommended**
 - Costly, but should wait until aquatic surveys are completed
 - Use previous PG&E studies if appropriate (Mill Creek or Angels Creek)

Other Required/Recommended Activities

-
- A. Finalization of CE Applications
 - B. USFS Special Use Authorization Permit (required)
 - C. SWRCB 401 Water Quality Certification (likely required)
 - D. CEQA Initial Study for 401 WQ Cert (required)
 - E. SHPO/Section 106 Studies & Consultation (required)
 - Phased approach, utilize as much as previous info as possible
 - Potential to be costly, depending on tribal/SHPO needs
 - F. Biological Assessment (USFWS)/Biological Evaluation (USFS)
 - Depending on data collection results (species presence)

High Level Cost Estimates (2024 – 2026)

Cost Element	2024 Costs		2025 Costs		2026 Costs	
	Lower End	Upper End	Lower End	Upper End	Lower End	Upper End
Ongoing Stantec Strategic and Regulatory Support	\$ 40,000	\$ 60,000	\$ 60,000	\$ 100,000	\$ -	\$ 25,000
Recommended Studies	\$ 225,000	\$ 650,000	\$ 50,000	\$ 55,000	\$ -	\$ -
Other Potential Studies (Modified or Unplanned)	\$ -	\$ -	\$ 115,000	\$ 550,000	\$ -	\$ -
Final CE Applications	\$ 30,000	\$ 50,000	\$ 10,000	\$ 25,000	\$ -	\$ 10,000
USFS Special Use Authorization Permit	\$ 5,000	\$ 25,000	\$ -	\$ 10,000	\$ -	\$ -
CEQA Initial Study/ 401 WQ Certificate	\$ 10,000	\$ 25,000	\$ 30,000	\$ 100,000	\$ -	\$ 25,000
SHPO/Section 106	\$ 150,000	\$ 300,000	\$ 25,000	\$ 50,000	\$ -	\$ -
Biological Assessment/ Biological Evaluation	\$ 10,000	\$ 50,000	\$ 30,000	\$ 100,000	\$ -	\$ 25,000
Summary of Costs	\$ 470,000	\$ 1,160,000	\$ 320,000	\$ 990,000	\$ -	\$ 85,000
Low End Estimate Range	\$ 675,000	\$ 790,000	(higher cost assumes "not recommended" studies performed)			
Upper End Estimate Range	\$ 1,685,000	\$ 2,235,000	(higher cost assumes "not recommended" studies performed)			