Brenda McConathy – Principal Program Manager
Environmental Remediation
300 Lakeside Drive
Oakland, Ca 94612-3534
Cell: 650-203-3582
Email: Brenda.McConathy@pge.com

September 23, 2024

National Marine Fisheries Service
Permits and Conservation Division, Office of Protected Resources
1315 East-West Highway
Silver Spring, Maryland 20910

Attn: Ms. Kristy Jacobus, DVM, Marine Resources Management Specialist

Re: Request for Renewal IHA for the Piers 39 to 43½ Sediment Remediation Project, Sediment Investigation, San Francisco County, California

Dear Ms. Jacobus,

In January 2024, Pacific Gas and Electric Company (PG&E, Applicant) received an Incidental Harassment Authorization (IHA) from the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS), in accordance with the Marine Mammal Protection Act (MMPA) as amended (16 U.S.C. 1361 *et seq.*) to allow for incidental take of marine mammals by Level B harassment associated with activities required to conduct the Piers 39 to 43½ Sediment Remediation Project (Project). This IHA is valid from May 1, 2024 to April 30, 2025.

Since the issuance of the IHA, due to constraints associated with construction planning, the start of construction has been delayed and therefore the proposed work will now occur between March 1, 2025 to April 30, 2026. As some activities (specifically Red and White Fleet (RWF) relocation) will occur prior to May 1, 2024, a IHA renewal will be required. Project activities as described within the application remain consistent and estimates for take are not anticipated to change.

A minor change to the project description includes the addition of two piles to the RWF relocation facility. This portion of the project description should read as follows:

- RWF Temporary Relocation Piles: Relocation of the temporary berthing facility would require placement of approximately 20 coated steel pipe piles (10, 30 - 36-inch diameter guide piles and 10, 24-inch diameter fender piles) using primarily vibratory hammer installation method. Occasionally, attenuated impact hammer may be required to install 24-inch fender piles.

PG&E understands that preliminary monitoring reports are traditionally submitted with requests to renew IHAs. However, as discussed above, Project work has not begun and therefore the Project does not have any monitoring reports to provide at this time.

If you or your staff have any questions, please feel free to contact Ms. Paula Gill via electronic mail at PGill@integral-corp.com

Sincerely,

Brenda McConathy
Principal Program Manager, Environmental Remediation
Pacific Gas and Electric Company

CC: PR.ITP.applications@noaa.gov