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Filed Electronically

December 9, 2022

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Subject: Bishop Creek Hydroelectric Project (FERC Project No. 1394-080) updated measures and supplemental analysis

Dear Secretary Bose:

On June 29, 2022, Southern California Edison Company (SCE) filed its final license application (FLA) for a new license for the Bishop Creek Hydroelectric Project (No. 1394). Since that filing, SCE has responded to FERC's additional information requests; provided draft cultural technical resources report, and a draft Historic Properties Management Plan; and provided revised and supplemented Protection, Mitigation, and Enhancement (PM&E) measures related to water resources and sediment management (see October 31, 2022 filing, accession number 20221031-5168).

Since the filing of the FLA, SCE has also had ongoing discussions with the US Forest Service (USFS) regarding recreation needs in and around the Project area. The revised Recreation Resource Management Plan (RRMP) attached hereto as Enclosure 1 is intended to replace the Draft RRMP (Attachment B5) contained in Appendix B to Exhibit E of the FLA (PM&E measures). Consultation with the USFS regarding the revised RRMP is included also included with the RRMP.

On October 12, 2022, SCE issued a Letter of Intent (LOI) to the USFS, confirming our understanding related to capital improvements and operation and maintenance of USFS recreation facilities in and around the Bishop Creek Project (Enclosure 2). This LOI, together with a revised RRMP represents a comprehensive approach to SCE's recreation commitments during the next license term.

Secretary Bose
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SCE appreciates the consistent and collaborative effort from the USFS to develop measures that meet their resource objectives and SCE's operational needs. Please contact Matthew Woodhall at (626) 302-9596 (matthew.woodhall@sce.com) with any questions or concerns.

Sincerely,

DocuSigned by:
Wayne Allen
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Wayne Allen
Principal Manager,
Regulatory Support Services

Attachments:

Enclosures:	Enclosure 1 – Recreation Resources Management Plan (Revised December 2022)
	Enclosure 2 – Letter of Intent, dated October 12, 2022

Enclosure 1
Recreation Resources Management Plan

SOUTHERN CALIFORNIA EDISON

Bishop Creek Hydroelectric Project

(FERC Project No. 1394)



RECREATION RESOURCES

MANAGEMENT PLAN

DRAFT



REVISED DECEMBER 2022

SOUTHERN CALIFORNIA EDISON

Bishop Creek Hydroelectric Project (FERC Project No. 1394)

RECREATION RESOURCES MANAGEMENT PLAN

Southern California Edison
1515 Walnut Grove Ave
Rosemead, CA 91770

Revised: December 2022

Support from:

Kleinschmidt

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Attachment A	Facilities and Amenities Tables
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Acronyms

A

ABA	Architectural Barriers Act
ADA	Americans with Disabilities Act
ABAAS	Architectural Barriers Act Accessible Standards

B

Bishop Creek Project	Bishop Creek Hydroelectric Project
BLM	US Bureau of Land Management

C

CDFW	California Department of Fish and Wildlife
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F

FERC	Federal Energy Regulatory Commission
FLA	Final License Application
FSORAG	Forest Service Outdoor Recreation Accessibility Guidelines
FSTAG	Forest Service Trail Accessibility Guidelines

I

INF	Inyo National Forest
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K

kW	Kilowatt
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M

Msl	mean sea level
MWh	Megawatt-hour

N

NFS	National Forest System
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O

O&M operation and maintenance

P

Plan Recreation Resources Management Plan

PME protection, mitigation, and enhancement

Project Bishop Creek Hydroelectric Project

R

REC 1 Recreation Use and Needs Study

REC 2 Recreation Facilities Condition and Public Accessibility
Study

RRIP Recreation Resources Implementation Plan

S

SCE Southern California Edison Company

U

USDA United States Department of Agriculture

USFS United States Forest Service

1.0 INTRODUCTION

Southern California Edison Company (SCE) prepared this Recreation Management Plan (Plan) to accompany their Final Application for a New License from the Federal Energy Regulatory Commission (FERC) for the Bishop Creek Hydroelectric Project (Project) No. 1394. The Plan provides a structured approach to address Project related recreation needs, principally around Project facilities and reservoirs.

1.1 PROJECT LOCATION

Bishop Creek Project is located in the Owens Valley, along the eastern Sierra Nevada Mountains, (Figure 1.1-1). Most of the hydro-generation facilities have been in existence since the early 1900s. Project facilities include powerhouses¹, dams, impoundments (including South Lake and Lake Sabrina), diversions, weirs, outbuildings, valve houses, access roads, and a flowline. The Project's facilities are sited along Bishop Creek and its tributaries including South Fork, Middle Fork, and Green Creek, plus Birch Creek and McGee Creek north of Bishop Creek. Bishop, Birch, and McGee creeks are tributaries to the Owens River. Project facilities are situated across privately and federally-held properties (federal lands include those held and managed by the US Forest Service [USFS] and US Bureau of Land Management [BLM]). Land uses adjacent to the Project vary, and include residential, grazing, public recreation, and federally-designated wilderness land, among others.

The Project area is one of moderate to steep ridge and valley topography. Elevations within the drainages range from approximately 4,000-feet above mean sea level (msl) to over 13,000-feet above msl. Bishop Creek is a major stream with a total drainage area of approximately 70 square-miles, flowing northeastward approximately 28 miles from its headwaters in the Sierra Nevada to its confluence with the Owens River at the city of Bishop. The North, Middle and South Forks of Bishop Creek originate in nearby glacial basins separated by ridges. South Lake and Lake Sabrina are the major storage reservoirs in the watershed.

¹ Note to reader – in this document, the term “powerhouse” is used as a general reference to the structure; however, when referencing a specific structure, the term “Plant” is used.

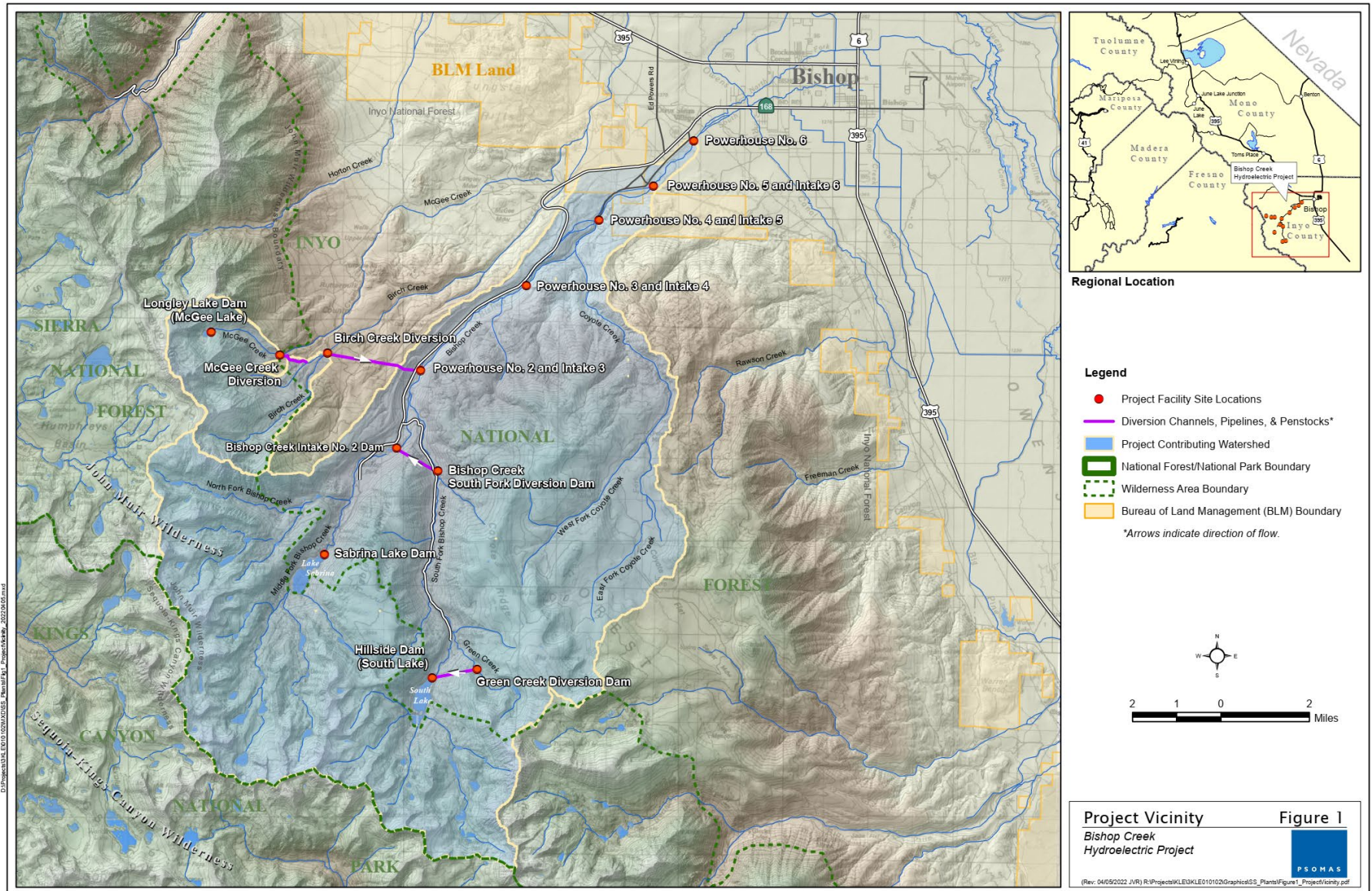


Figure 1.1-1 Project Vicinity.

1.2 PROJECT FACILITIES

SCE is the licensee, owner, and operator of the Bishop Creek Project FERC Project No. 1394 located on Bishop Creek near the community of Bishop in Inyo County, California. Bishop Creek Project facilities are located within the Inyo National Forest (INF) and the John Muir Wilderness (managed by the U.S. Forest Service [USFS]), and includes lands managed by the BLM and private lands. The Bishop Creek Project consists of five developments: Power Plant No. 2 through No. 6 on the Middle Fork of Bishop Creek and three primary storage reservoirs that include South Lake, Lake Sabrina and Longley Lake.

The Bishop Creek Project has a total dependable generating capacity of 28,925 kilowatts (kW) and has an average annual energy production of 128,039 megawatt hours (MWh). Stored water is transported through a series of connecting flowlines and penstocks to the powerhouses and returned to the river through the tailrace at Plant No. 6. Under the existing Project license, the FERC Project boundary encompasses federal lands administered by either the U.S. Department of Agriculture (USDA) Forest Service or the BLM, and SCE-owned or private land. SCE does not propose any changes to Project operations and maintenance (O&M) and does not propose any new construction.

For additional information about these features and their operations, please see Exhibit E of the 2022 Final License Application (FLA), available at www.ferc.com or www.sce.com/bishopcreek. Project Recreation Facilities are further described in Section 4.0 of this plan.

2.0 PURPOSE AND INTENT

The Recreation Resources Management Plan was prepared to accompany the new FERC license application for the Bishop Creek Project. The primary purpose and intent of this Plan is to describe the protection, mitigation, and enhancement (PME) measures for recreation resources that SCE proposes to implement during the new license term and to document consultation with state and federal agencies and stakeholders regarding those measures. The facilities described in this Plan are located on USFS and SCE lands. Accordingly, this Plan was developed primarily in consultation with the USFS through the filing of the FLA in June 2022. Other stakeholders, including California Department of Fish and Wildlife (CDFW), were involved in developing a stocking management PME to support recreational fishing needs that are separate from this Plan (PME-3, Appendix B of Exhibit E).

3.0 GOALS OF THE RECREATION RESOURCESMANAGEMENT PLAN

The goal of this Recreation Resources Management Plan is to set forth a plan, basic content, and a schedule for developing a final Recreation Resources Management plan (RRMP), which will be finalized in consultation with the USFS, within the first two years of license issuance.

Within two years of license issuance, SCE will develop a Final RRMP e that meets the following goals:

- Provide an implementation schedule for upgrades to license-related recreation facilities and amenities
- Provide conceptual drawings and cost estimates for upgrades to license-related recreation facilities and amenities
- Provide an operations and maintenance plan for license-related facilities and amenities
- Make provisions for adequate access to recreational facilities that consider the needs of persons with disabilities, and without regard to race, color, sex, religious creed or national origin
- Provide measures to provide adequate and safe public access
- Coordinate recreation planning and management efforts with INF to balance public access and use of recreation facilities with natural and cultural resource management objectives
- Support cost-effective recreation facilities that benefit the recreating public for the duration of the license term

4.0 RECREATION RESOURCES AND PROPOSED MEASURES

All developed recreation facilities within or adjacent to the Bishop Creek Project are owned by USFS and managed by USFS or its concessionaires. In consultation with USFS, a number of recreation facilities were identified for inclusion in this Plan based on the results of the Recreation Use and Needs (REC 1) and the Recreation Facilities Condition and Public Accessibility (REC 2) studies as described in the FLA. This includes recreation facilities and informal uses associated with the three Project reservoirs (South Lake, Lake Sabrina, and Intake No. 2 Reservoir). Attachment A provides proposed recreation facilities and amenities tables describing those facilities that were determined to be Project-related and included in a future license for the Project.

Generally, the studies identified existing facilities in need of repair or replacement but also identified the need for a more programmatic approach to resolve issues, that include improved parking availability and circulation for all reservoirs. These studies identified the need for actions related to the preclusion of informal uses (e.g., unauthorized camping activities at the south end of Lake Sabrina and South Lake or unsafe use of Green Creek Diversion Pipeline as a connector trail), where management actions will be taken. As such, no facility-specific improvements or management actions are proposed at this time but will be informed by a landscape architect review and analysis to be conducted within the first 2 years of FERC's issuance of a new license for the Project. Attachment B describes proposed measures as they relate to specific facilities and amenities that will be enhanced and be considered license-related recreation facilities. As described above, the implementation plan and schedule will be developed in consultation with USFS, after the landscape architect completes their facilities assessments, and conceptual drawings, cost estimate refinements have been developed within the first two years of license issuance, and as submitted for approval as the final RRMP, as described below.

These early exploratory actions will inform PME measures and provide an implementation schedule that will be developed in consultation with stakeholders and included in the final RRMP. To the extent that future resource modifications be considered under the RRMP, SCE conducted resource surveys (wildlife, botanical, and cultural) to assess resource impacts that encompass Project lands, which can be utilized in future planning and assessment.

4.1 IMPLEMENTATION ACTIVITIES AND SCHEDULE

Within 2 years of the new license issuance, SCE will develop the final RRMP, which will include a plan and schedule for implementation activities, in consultation with the USFS and other stakeholders. Stages of development and ensuing implementation of the plan and schedule would consist of planning, design, and construction activities. Initial planning activities would include the procurement of a qualified landscape architect to address the following exploratory actions:

- Programmatically address parking capacity, flow, and management at Lake Sabrina, South Lake, and Intake No. 2 Reservoir to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility

- Conduct a facility condition and public accessibility assessment of campsite facilities at Lower Intake No. 2 Campground and assess the need and/or feasibility of up to ten additional campsites at this location
- Conduct a feasibility and needs analysis for renovation or reconstruction, as needed of Lake Sabrina and/or South Lake boat ramps and related facilities, including universal accessibility

The landscape architect would collect applicable USFS standards and existing inventory data to incorporate into the development of both a draft and final report, including conceptual drawings for facility modifications, as needed. Results of the above analyses would be discussed with the USFS and other relevant stakeholders to determine 1) priorities for actions, design, and construction; 2) cost share responsibilities for capital improvements and ongoing O&M; 3) conceptual designs, and 4) an implementation schedule for those improvements, all of which would be recorded in the RRMP and filed with FERC for approval. All early exploratory field work, consultation with relevant stakeholders, planning and design, and development of the final RRMP is scheduled to be completed within 2 years of license issuance. It is anticipated that most construction activity would be completed during the first 5 to 10 years of the final RRMP. For those items that are currently in excellent condition, the project would be revisited for potential replacement replaced as needed throughout the term of the new license.

In general, existing recreation facilities proposed for reconstruction would be reconstructed in-kind to provide the same level of development and visitor comfort while meeting current, applicable federal and state guidelines that exist during the design and construction phase for these facilities. If planned construction activities are scheduled to begin more than 3 years after USFS design approval, the design would be revisited and updated as necessary to ensure compliance with current, applicable federal and state guidelines and reapproved by the USFS. In some cases, the existing facility design would be adjusted to achieve objectives such as incorporating measures to address any recreation-related impacts to environmental resources, increasing capacity, or redirecting recreational use. Before the design is prepared for reconstruction of the recreation facilities located on National Forest System (NFS) land, SCE will meet with the USFS to review design and functionality based on current use patterns. Reasonable modifications will be made to the facility design to address the functionality of the facility regarding current and projected future use and compliance of the facility with current design standards, as described below, where and when feasible.

4.2 REGULATORY REQUIREMENTS AND GUIDANCE DOCUMENTS

All recreation facilities designed, constructed, or reconstructed on SCE-owned lands are required to comply with most current guidelines for buildings and facilities covered by the

Americans with Disabilities Act (ADA) of 1990², American Barriers Act (ABA)³, (Physical Access Regulations). All recreation facilities designed, constructed, or reconstructed on NFS lands are required to comply with applicable ABAs [FSORAG], and Forest Service Trail Accessibility Guidelines [FSTAG]).

The FSORAG and FSTAG provide guidance for maximizing the accessibility of outdoor recreation areas and trails in the NFS, while protecting the unique characteristics of their natural setting. Both guidelines include conditions for an exception and general exceptions that may be applied to some specific technical requirements. Guidance and documentation in accordance with the practices described in the FSORAG and FSTAG must be followed when applying conditions for exception.

Section 504 of the Rehabilitation Act of 1973 requires that no person be denied access to a program or activity just because the person has a disability. This Act requires that any existing facility on NFS land that is entered by employees or the public to participate in the program or activity inside that facility is required to comply with the applicable accessibility standards and guidelines.

Renovation or new facilities design will follow guidance provided in Forest Service Built Environment Image Guide (USDA Forest Service, 2001) and USFS Planning and Design of Developed Recreation Sites and Facilities (USDA Forest Service 2018) .

4.3 RECREATION RESOURCES MANAGEMENT PLAN

4.3.1 OBJECTIVES OF THE RECREATION RESOURCES MANAGEMENT PLAN

To meet the goals identified in 3.0, the final RMP will meet the following objectives:

- Programmatically address parking constraints at Lake Sabrina, South Lake, and Intake No. 2 Reservoir by employing a qualified landscape architect to accomplish the following:
 - Maximize parking capacity for day-use activities
 - Prioritize reconfiguration of existing facility footprints
 - Add parking capacity where space allows
 - Focus on combined parking capacity among all reservoirs to achieve desired metrics
 - Address parking conflicts (day use, overnight, and trailer parking conflicts; pedestrian and vehicular traffic conflicts).
 - Identify solutions for managing parking capacity on peak days

² Standards that apply to places of public accommodation, commercial facilities, and state and local government facilities. As of this date the most current guidelines are provided in the 2010 ADA Standards of Accessible Design (2010 Standards) (DOJ, 2010).

³ Building standards codes designed to comply with the requirements of ADA and state statutes.

- Determine which facilities to repair or replace at Lake Sabrina, South Lake, and Intake No. 2 Reservoir – including the improvement of facilities to meet universal accessibility and FSORAG standards – based on previous facility condition and public accessibility reports, results of landscape architect analysis, and in consultation with the USFS.
- Address informal uses (e.g., camping, hiking) at Lake Sabrina, South Lake, and Intake No. 2 Reservoir, as identified in previous facility condition and public accessibility reports and in consultation with the USFS.
- Assess the need for and feasibility of developing up to ten additional campsites at Intake No. 2 Reservoir, to be determined in early exploratory actions by a landscape architect following license issuance. Need, feasibility, and priority will be considered, in consultation with the USFS, when determining the timing of any proposed improvements.
- When planning rehabilitation of specific recreation facilities, evaluate if recreation resources are compatible with other resource management plans and take appropriate steps to address any inconsistencies.
- Prioritize improvements and develop a schedule for implementation.
- Describe SCE's ongoing responsibilities for maintenance and/or monitoring of recreation facilities within a new license term.

4.3.2 ADDITIONAL CONTENTS OF THE RECREATION RESOURCES MANAGEMENT PLAN

The RRMP will include the following sections, at a minimum:

- **Introduction.** Introductory information, including the purpose and objectives of the RRMP.
- **Existing Recreation Resources.** Description of existing recreation resources and facilities included in the RRMP.
- **Proposed Recreation Measures.** Description of all recreation measures to be implemented in the RRIP, including those related to facility improvements/repair, new construction, management activities, and O&M activities/responsibilities.
- **Operations & Maintenance.** A plan will be developed in coordination with USFS for ongoing operation and maintenance of license-related recreation facilities over the term of the new license.
- **Implementation of Schedule.** Schedule for implementation of all RRMP activities, including those related to facility improvements/repair, new construction, management activities, and O&M activities/responsibilities.

- **Treatments for Resource Impacts Related to Recreation Use.** Description of measures to address recreation-related resource impacts, including best practices for any restoration, education, or management efforts to address informal uses or for proposed construction activities. Specific attention for plantings buffering, screening, and enhancing any planned site improvements. All efforts must be compatible with other resource management plans with appropriate steps taken to address any inconsistencies.
- **Recreation Monitoring Program.** If required, a recreation monitoring program to monitor recreation use, needs, and impacts and a plan to address results over the new license term.
- **Plan and schedule for periodic updates to the RRMP.** A brief plan, process and schedule will be provided to account for periodic updates to the RRMP, in consultation with USFS, estimated to occur on 10 to 15 year intervals.
- **Annual Recreation Coordination Meeting and Plan Revision.** Details of the process for annual consultation to coordinate on O&M activities.
- **Consultation History.** Documentation of all consultation, reviews, and approvals related to RRMP development.
- **Project Recreation Facilities/Amenities Tables and Design or As-Built Site Plan Drawings.** As applicable, facilities/amenities tables will be developed according to FERC requirements. Any proposed design or as-built drawings available at the time of filing of the RRMP will be included.

SCE meets with the USFS and CDFW on an as-needed basis throughout the year to discuss the Project and implementation activities. SCE will continue to consult with agency staff on an as-needed basis.

5.0 REFERENCES

Department of Justice (DOJ). 2010. Americans with Disabilities Act Standards for Accessible Design. U.S. Department of Justice. Washington D.C. September. Accessed at https://www.ada.gov/2010ADASTandards_index.htm

Forest Service (USDA, Forest Service). 2001. The Built Environment Image Guide for the National Forests and Grasslands. USDA, Forest Service, FS-710, September. Accessed December 5, 2017: https://www.fs.fed.us/recreation/programs/beig/01_frontmatter.pdf.

USDA Forest Service. 2001. https://www.ada.gov/2010ADASTandards_index.htm.

USDA Forest Service. 2018. Recreation Site Handbook (FSH 2309.13), Chapter 10 – Planning and Design of Developed Recreation Sites and Facilities.

ATTACHMENT A
PROPOSED FACILITIES AND AMENITIES TABLES

Table A-1 Proposed Project Recreation Facilities Table^a

Recreation Site Name	Recreation Facilities
Intake No. 2 Day Use Area (Facilities Owned by USFS)	<p>Intake No. 2 Fishing Pier: ADA fishing pier (concrete ramp and wood pier) Intake No. 2 Bank Fishing (Informal): Informal bank fishing, primarily along SCE access road on northern shoreline Intake No. 2 Picnic Area: 2 picnic tables with BBQ grills Infrastructure: Approximately 20 head-in parking stalls (± 24 ft x 200 ft of earthen/crushed rock); pre-cast concrete, single occupancy pit toilet (ADA compliant); recycling receptacles; dumpster</p>
Lower Intake No. 2 Campground (Facilities Owned by USFS)	<p>Lower Intake No. 2 Campground: 5 walk-in campsites, each with a picnic table, fire pit, and bear locker Infrastructure: Approximately 12 head-in parking stalls (± 24 ft x 200 ft of earthen/crushed rock); CMU block, single occupancy pit toilet; water hydrant; kiosk</p>
Lake Sabrina Recreation Area (Facilities Owned by USFS)	<p>Lake Sabrina Boat Launch: Single lane, concrete boat ramp; 2 floating boat slips/docks; 2 fixed gangways; fish cleaning station Lake Sabrina Boat Landing: Marina building operated by a USFS concessionaire Inlet Trail (Informal): Informal trail leading from Lake Sabrina Boat Landing approximately 0.5 miles to the mid-lake peninsula Lake Sabrina Tailrace Fishing Access (Informal): Informal bank fishing below the dam and along the access road Lake Sabrina Reservoir Fishing Access (Informal): Informal bank fishing along Inlet Trail Sabrina Basin Trailhead: Trailhead with kiosk providing recreation and safety information. Approximately 600 feet of trail from trailhead to the spillway that is maintained by SCE for O&M access. Infrastructure: Approximately 30 informal roadside parking stalls (earthen) along the access road; 24 parking stalls (asphalt) in a lower lot; 36 stalls (asphalt) in an upper lot; CMU block, double occupancy pit toilet; recycling receptacles; trash receptacles; 2 dumpsters</p>
South Lake Recreation Area (Facilities Owned by USFS)	<p>South Lake Boat Launch: Double lane, concrete boat ramp; floating boat slip/dock South Lake Landing: Marina building operated by a USFS concessionaire Weir Lake Fishing Access (Informal): Informal bank fishing below the dam and above Weir Lake weir South Lake Reservoir Fishing Access (Informal): Informal bank fishing adjacent to the upper parking lot and Bishop Pass Trailhead South Lake Picnic Area (Lower): 3 picnic tables adjacent to the boat ramp South Lake Picnic Area (Upper): 2 picnic tables adjacent to upper parking lot and Rainbow Pack Station Trailhead Infrastructure: 5 pull-in parking stalls (asphalt) at Weir Lake; 15 trailer parking stalls (asphalt) across from boat launch; 8 parking stalls and a CMU block, double occupancy pit toilet near boat launch; 86 parking stalls (asphalt), a pre-cast concrete, double occupancy pit toilet (ADA compliant), recycling receptacles, trash receptacles, dumpster, and 6 food lockers and kiosk adjacent to Bishop Pass Trailhead</p>

^a Developed in accordance with FERC's July 2014 Project Recreation Facilities Tables and As-Built Site Plan Drawing Guidance document;
Note: CMU = concrete masonry units

Table A-2 Draft Project Recreation Amenities Table^a

Project No.	Development Name	Recreation Amenity Name	Recreation Amenity Type	Amenity Status	Latitude	Longitude	FERC Citation & Date ^b
P-1394	Bishop Creek 2	Intake No. 2 Fishing Pier	Reservoir Fishing	Constructed – Improvements Pending	37.24826	-118.585736	TBD
P-1394	Bishop Creek 2	Intake No. 2 Bank Fishing (Informal)	Reservoir Fishing (Informal)	Informal Use – Improvements Pending	37.24818	-118.584081	TBD
P-1394	Bishop Creek 2	Intake No. 2 Picnic Area	Picnic Area	Constructed – Improvements pending	37.2478	-118.586603	TBD
P-1394	Bishop Creek 2	Lower Intake No. 2 Campground	Campground	Constructed – Improvements Pending	37.24731	-118.586667	TBD
P-1394	Bishop Creek 2	Lake Sabrina Boat Launch	Boat Launch	Constructed – Improvements Pending	37.21231	-118.61387	TBD
P-1394	Bishop Creek 2	Lake Sabrina Boat Landing	Marina	Constructed - Improvements Pending	37.21241	-118.614007	TBD
P-1394	Bishop Creek 2	Inlet Trail (Informal)	Trail (Informal)	Informal Use - Improvements Pending	37.21258	-118.614035	TBD
P-1394	Bishop Creek 2	Lake Sabrina Tailrace Fishing Access (Informal)	Tailrace Fishing (Informal)	Informal Use - Improvements Pending	37.21322	-118.61126	TBD
P-1394	Bishop Creek 2	Lake Sabrina Reservoir Fishing Access (Informal)	Reservoir Fishing (Informal)	Informal Use - Improvements Pending	37.21196	-118.61452	TBD
P-1394	Bishop Creek 2	Sabrina Basin Trailhead	Trailhead	Constructed - Improvements Pending			TBD
P-1394	Bishop Creek 2	South Lake Boat Launch	Boat Launch	Constructed - Improvements Pending	37.17184	-118.565773	TBD
P-1394	Bishop Creek 2	South Lake Landing	Marina	Constructed - Improvements Pending	37.17167	-118.565842	TBD
P-1394	Bishop Creek 2	Weir Lake Fishing Access (Informal)	Tailrace Fishing (Informal)	Informal Use - Improvements Pending	37.17601	-118.563718	TBD
P-1394	Bishop Creek 2	South Lake Reservoir Fishing Access (Informal)	Reservoir Fishing (Informal)	Informal Use - Improvements Pending	37.16815	-118.566446	TBD

Project No.	Development Name	Recreation Amenity Name	Recreation Amenity Type	Amenity Status	Latitude	Longitude	FERC Citation & Date^b
P-1394	Bishop Creek 2	South Lake Picnic Area (Lower)	Picnic Area	Constructed - Improvements Pending	37.17189	-118.56586	TBD
P-1394	Bishop Creek 2	South Lake Picnic Area (Upper)	Picnic Area	Constructed - Improvements Pending	37.16998	-118.565664	TBD

^a Developed in accordance with FERC's July 2014 Project Recreation Facilities Tables and As-Built Site Plan Drawing Guidance document

^b Order requiring and/or approving the inclusion of such recreation amenity into the Project license

ATTACHMENT B
PROPOSED RECREATIONS MEASURES TABLES

Table B-1 Proposed Project Recreation Facilities Table

FACILITY/USE	TYPE		SCE PROPOSED IMPROVEMENT(S) ²	EST. CAPITAL COST ¹	CONDITION/ACCESSIBILITY/CAPACITY
ALL	Planning		Within 2 years of license issuance, SCE will finalize the RRIP in consultation with the USFS and other relevant stakeholders, including the procurement of a landscape architect, as discussed in Section 3 of the draft RRMP.	\$400,000	
ALL	Planning		Ten years following license issuance, SCE will assess the adequacy of recreational facilities and current recreational needs.	\$150,000	
Cost Estimate - Planning			\$550,000		
INTAKE NO. 2 RESERVOIR	Intake No. 2 Fishing Pier	Reservoir Fishing	Repair handrails and construct an accessible route to the pier.	\$15,000	<ul style="list-style-type: none"> • Handrails on pier need repair. • Pier is accessible but there is a lack of an accessible route to the pier. • Otherwise, it is in good condition.
	Intake No. 2 Bank Fishing (Informal)	Reservoir Fishing (Informal)	Provide accessible path from parking to accessible pier. Identify existing shoreline access points to potentially make accessible.	\$15,000	<ul style="list-style-type: none"> • Mostly accessed by SCE dirt road behind gate along northern shore. Dirt road in good condition but not universally accessible. • Fishing pier is accessible but the path to it is not. No accessible access points to shore. • Heavily used on average by 15.2 anglers. Only an issue during peak use (34.0 average users).
	Intake No. 2 Picnic Area	Picnic Area	Replace picnic tables and BBQ grills. Provide accessible path from parking to accessible picnic tables.	\$15,000	<ul style="list-style-type: none"> • 2 picnic tables each with BBQ grills noted as needing maintenance and accessibility improvements.
	Parking (Intake No. 2 Day Use)	Parking	While capacity was not identified as an issue at Intake No. 2, within the first 2 years of license issuance, a landscape architect will be employed to programmatically address parking capacity, flow, and management to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility.	\$225,000	<ul style="list-style-type: none"> • ± 24 ft x 200 ft (Room for approx. 20 head-in parking stalls; earthen / crushed rock; noted as needs maintenance) • Pedestrian and vehicular conflicts. • No designated accessible parking spaces or routes to restroom and accessible fishing pier. • Under capacity. Avg vehicles all (8.6/20 = 43%) and peak (16.0/20 = 80%).

FACILITY/USE	TYPE		SCE PROPOSED IMPROVEMENT(S) ²	EST. CAPITAL COST ¹	CONDITION/ACCESSIBILITY/CAPACITY
	Restroom (Intake No. 2 Day Use)	Restroom	Replace existing restroom with an accessible CXT restroom, including an accessible route to such restroom.	\$75,000	<ul style="list-style-type: none"> • Pre-cast concrete with single pit toilet. Good condition/ADA compliant. • Lacking universally accessible route.
	Lower Intake No. 2 Campground	Campground	<p>Repair/replace in kind the campsite facilities noted in the REC 2 report as needing repair or replacement.</p> <p>Within the first 2 years of license issuance, a landscape architect would be employed to conduct a facility condition and public accessibility assessment of campsite facilities at Lower Intake No. 2 Campground and assess the need and/or feasibility of up to 10 additional campsite facilities at this location.</p>	\$225,000	<ul style="list-style-type: none"> • 5 walk-in sites, 2 picnic tables, trash receptacles, dumpster, BBQ grills, water hydrant, kiosk/pay station, and signage are all in need of maintenance, accessibility improvements, potential expansion, and/or parking/flow improvements.
	Parking (Lower Intake No. 2 Campground)	Parking	<p>While capacity was not identified as an issue at Intake No. 2, within the first two years of license issuance, a landscape architect will be employed to programmatically address parking capacity, flow, and management as a whole to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility.</p> <p>It is assumed that any improvements made to the parking at Lower Intake No. 2 Campground would occur in the same mobilization as Intake No.2 day use parking. Therefore, costs associated with this parking area are included in those estimates.</p>	\$75,000	<ul style="list-style-type: none"> • ± 24 ft x 200 ft (Room for approx. 12 head-in parking stalls); earthen / crushed rock; noted as needs maintenance. • Pedestrian and vehicular conflicts. • No designated accessible parking spaces or accessible routes to restroom or campground. • Under capacity. Avg cars all (2.8/12 = 24%) and peak (5.5/12 = 46%)
	Restroom (Lower Intake No. 2 Campground)	Restroom	Replace existing restroom with an accessible CXT restroom, including an accessible route to such restroom.	\$75,000	<ul style="list-style-type: none"> • CMU block construction. Locked during inspection and out of order. • Lacking universally accessible route.
	Cost Estimate for Intake 2 Recreation Area			\$720,000 (CAP)	

FACILITY/USE	TYPE		SCE PROPOSED IMPROVEMENT(S) ²	EST. CAPITAL COST ¹	CONDITION/ACCESSIBILITY/CAPACITY
LAKE SABRINA	Parking (Lake Sabrina Tailrace Fishing Access [Informal])	Parking	Within the first 2 years of license issuance, a landscape architect would be employed to programmatically address parking capacity, flow, and management as a whole to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility. Example: Install signage directing overnight users to the overnight wilderness lot a mile south of Lake Sabrina.	\$215,000	<ul style="list-style-type: none"> • Approx. 30 pull outs on earthen material in need of maintenance/formalization. • Not accessible but not advised for accessible parking. • Avg vehicles all (11.9/30 = 40%) and peak (37.0/30 = 123%).
	Parking (Lower lot)	Parking	Within the first 2 years of license issuance, a landscape architect would be employed to programmatically address parking capacity, flow, and management as a whole to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility. Example: Repave and restripe. Improve pedestrian route from lot to other recreation facilities.	\$210,000	<ul style="list-style-type: none"> • 24 stalls; asphalt; noted as needs maintenance; lack of trailer parking/flow. • Pedestrian and vehicular conflicts. • No designated accessible parking spaces/paths. • No ADA boat loading areas. • Parking capacity = 24. • Avg vehicles all (5.1/24 = 21%) and peak (11.5/24 = 48%).
	Parking (Upper lot)	Parking	Within the first 2 years of license issuance, a landscape architect would be employed to programmatically address parking capacity, flow, and management to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility. Example: Repave and restripe to include dedicated trailer parking areas, accessible parking spaces and routes, and to reduce pedestrian and vehicular conflicts. Construct an ADA boat loading area.	\$225,000	<ul style="list-style-type: none"> • 36 stalls; asphalt; noted as needs maintenance; lack of trailer parking/flow. • Pedestrian and vehicular conflicts. • No designated accessible parking spaces/paths. • No ADA boat loading areas. • Parking capacity = 36. • Avg vehicles all (16.5/36 = 46%) and peak (25.0/36 = 69%). • Avg vehicles w trailers all (0.3) and peak (0.5).
	Inlet Trail (Informal)	Trail (Informal)	Formalize trail to mid-lake peninsula. Sign trailhead to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness. Sign the end of formal trail at the mid-lake peninsula.	\$10,000	<ul style="list-style-type: none"> • User created trail extends approximately 1.2 miles from the marina to the inlet of Middle Fork Bishop Creek at the southeastern corner of Lake Sabrina. • Potential need for trail maintenance if a portion of the trail is formalized to provide access to the northern shoreline. • 19.5 average weekly users. • Most daily users Saturdays (4.3) and Mondays (3.9) as is used largely by anglers to access inlet. • Use is relatively consistent throughout rec season.

FACILITY/USE	TYPE		SCE PROPOSED IMPROVEMENT(S) ²	EST. CAPITAL COST ¹	CONDITION/ACCESSIBILITY/CAPACITY
	Lake Sabrina Boat Launch	Boat Launch	Within the first 2 years of license issuance, continue to consult with USFS on the scope and design of rehabilitation of the boat ramp area and related facilities. Improve accessible routes to boat ramp and related facilities.	\$725,000	<ul style="list-style-type: none"> • Boat ramp in good condition. • Noted as needing maintenance: boat slips/docks, gangways, trash receptacles, recycling receptacles, guardrails. • Noted need for site-wide improvements to universal accessibility, circulation, pedestrian/vehicle conflicts. • No accessible amenities and shoreline access points.
Cost Estimate for Lake Sabrina Recreation Area				\$1,385,000 (CAP)	
SOUTH LAKE	South Lake Boat Launch	Boat Launch Area	<p>Within the first 2 years of license issuance, continue to consult with USFS on the scope and design of South Lake boat ramp area improvements and related facilities.</p> <p>Repair/replace/improve stairs to launching pier. Replace vehicular access gate. Investigate feasibility and need for boat ramp expansion for low water levels, relative to boating capacity at both South Lake and Sabrina reservoirs</p>	\$110,000	<ul style="list-style-type: none"> • Except for the boat ramp, all paved areas were repaved in 2020/2021. Noted as in good condition but is unusable at low water scenarios. • May be limited by drop off in lakebed but potential for extension. • Launching pier in good condition • The following were noted as needing maintenance: stairs to launching pier, boat ramp vehicular access gate.
	South Lake Picnic Area (Lower)	Picnic Area	Replace 3 picnic tables.	\$15,000	<ul style="list-style-type: none"> • Three picnic tables noted as needing maintenance.
	Parking (South Lake Boat Launch)	Parking at Boat Ramp	<p>Within the first 2 years of license issuance, a landscape architect would be employed to programmatically address parking capacity, flow, and management as a whole to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility.</p> <p>Example: Recently repaved (striping status unknown).</p> <p>Potentially restripe to include ADA parking and access routes, dedicated trailer parking. Construct ADA boat loading area, if feasible.</p>	\$225,000	<ul style="list-style-type: none"> • 15 parking stalls; no designated accessible parking spaces or boat trailer spaces, and no accessible boat loading areas. • Repaved with South Lake Road construction in 2020/2021. Excellent condition. • Pedestrian and vehicular conflicts. • Parking capacity = 15. • Avg vehicles all (7.6/15 = 50%) and peak (19.0/15 = 127%). • Avg vehicles with trailers all (0.1) and peak (0.0).

FACILITY/USE	TYPE		SCE PROPOSED IMPROVEMENT(S) ²	EST. CAPITAL COST ¹	CONDITION/ACCESSIBILITY/CAPACITY
	Restroom (By stairs to launching pier)	Restroom	Replace existing restroom with an accessible CXT restroom, including an accessible route to such restroom.	\$75,000	<ul style="list-style-type: none"> • Pit toilet with no supporting utilities; pre-engineered CMU structure on a slab with a standing seam metal roof. ADA deficiencies. The interior is in poor condition and needs repairs and maintenance upgrades. • ADA deficiencies that could be resolved in replacement or direct users to other restrooms.
	South Lake Picnic Area (Upper)	Picnic Area	Replace tables and provide accessible routes. Slope and surfacing may warrant moving the picnic area if accessibility is needed.	\$10,000	<ul style="list-style-type: none"> • Two tables in need of repair. • Trail is inaccessible due to slope and surfacing. • Tables and areas are not compliant. • No access around chain gate when closed.
	Informal Trail (Along Green Creek Diversion Pipeline)	Trail (Informal)	Install educational signage at trailhead and at the end of Green Creek Diversion Pipeline to direct users along USFS trail and not along the pipeline. Signage may be needed where the pipeline crosses the USFS trail up the hill.	\$5,000	<ul style="list-style-type: none"> • Project pipeline (currently out of use) creates a thoroughfare that is being used as a trail or shortcut between South Lake parking and the USFS' Baker Summit Trail. Much of this stretch winds around cliff faces and is not advisable to use as a public trail. • 38.2 weekly users. • Highest daily averages Fri (10.2), Sat (17.1), Sun (19.0) as the pipeline ROW is used as a shortcut by hikers to other USFS trails. • Daily use steadily increases in the morning, peaking mid-day, and receding late afternoon.
	Cost Estimate for South Lake Recreation Area			\$440,000 (CAP)	
TOTAL COST ESTIMATE FOR INTAKE 2, LAKE SABRINA, SOUTH LAKE RECREATION IMPROVEMENTS				\$550,000 (Planning) \$2,545,000 (CAP)	

¹ Cost estimates are draft and are provided for reference only. Dollars are presented in in 2022 dollars.

²To be determined by qualified land scape architect, conform with USFS design standards. wo 2309.13 10 Planning and Design of Developed Recreation Sites and Facilities.docx (live.com)

Notes:
 ADA Americans with Disabilities Act
 CMU Single restroom building (Concrete Masonry Units)
 O&M operation and maintenance
 ROW right of way

In addition to proposed License related capital facility improvement measures described in Table 1, SCE also proposes to implement maintenance and restoration measures to informal, unauthorized recreation impact areas described in Table 2. The goal of these measures is to better manage use and to deter environmental impacts to areas around Lake Sabrina and South Lake where camping is prohibited.

Table B-2 Operation and Maintenance (O&M) Activities Associated with Capital Facilities Improvements at Lake Sabrina and South Lake

FACILITY/USE	TYPE	SCE PROPOSED IMPROVEMENT(S) ³	EST. MAINTENANCE/RESTORATION COST ¹	CONDITION ASSESSMENT COMMENTS
Lake Sabrina Informal Camping (mid lake)	Camping (Informal/Unauthorized)	Remove fire rings and other camp structures. Signage to be installed to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.	\$10,000 (O&M)	<ul style="list-style-type: none"> Popular destination for day use, fishing, and potentially overnight camping with approximately 16 potential campsites; two established fire pits; and 2,004 feet of user created trails on the peninsula.
Lake Sabrina Informal Camping (southern end of lake)	Camping (Informal/Unauthorized)	Remove fire rings and other camp structures. Signage to be installed to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.	\$10,000 (O&M)	<ul style="list-style-type: none"> Approx. 31 potential campsites; 4 fire pits; and 1,086 feet of user created trails were observed in the area. An approximate 2,941 feet of shoreline on the south end of the lake is a popular fishing bank and general day use area for users at the back of the lake that launched from the boat ramp or accessed the area via the informal Inlet Trail.
South Lake Informal Camping (island at southern end of lake)	Camping (Informal/Unauthorized)	Remove fire rings and other camp structures. Sign areas to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.	\$10,000 (O&M)	<ul style="list-style-type: none"> Approximately 36 potential campsites and 11 fire pits were observed at various locations throughout the island.
South Lake Informal Camping (southern end of lake)	Camping (Informal/Unauthorized)	Remove fire rings and other camp structures. Sign areas to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.	\$10,000 (O&M)	<ul style="list-style-type: none"> Four distinct areas along the southern shoreline of South Lake were noted where potential camping and other day use activities were observed.

FACILITY/USE	TYPE	SCE PROPOSED IMPROVEMENT(S) ³	EST. MAINTENANCE/RESTORATION COST ¹	CONDITION ASSESSMENT COMMENTS
<p>South Lake Parking (By stairs to launching pier)</p>	<p>Parking</p>	<p>Within the first 2 years of license issuance, a landscape architect would be employed to programmatically address parking capacity, flow, and management to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility.</p> <p>Investigate improvements to parking alignments – no proposed capital improvements</p> <p>Example: Recently repaved (striping status unknown). Potentially restripe to include ADA parking and access routes.</p>	<p>\$10,000 (O&M)</p>	<ul style="list-style-type: none"> • 8 parking stalls; no designated accessible parking spaces. • Repaved with South Lake Rd construction in 2020 /2021. Excellent condition. Unsure if this solved any of the issues above. • Pedestrian and vehicular conflicts. • Parking capacity = 8. • Avg vehicles all (5.8/8 = 37%) and peak (9.5/8 = 119%).
<p>South Lake Parking (Bishop Pass & Rainbow Pack Station Trailheads)</p>	<p>Parking</p>	<p>Within the first 2 years of license issuance, a landscape architect would be employed to programmatically address parking capacity, flow, and management as a whole to increase total capacity among all reservoirs, resolve conflicting uses, and address universal accessibility. Determine cost share percentage of site given use for wilderness access.</p> <p>Investigate potential to restripe recently repaved parking area to maximize parking and include accessible parking and access routes.</p>	<p>\$10,000 (O&M)</p>	<ul style="list-style-type: none"> • 86 stalls; 50 designated for overnight wilderness use; needs restriping. • Repaved with South Lake Rd construction in 2020/2021. Excellent condition • 4 ADA stalls exist but need loading zones, restriping, and accessible routes. • Conflicting uses (day use vs overnight wilderness use) • Parking capacity = 86. • Avg vehicles all (75.4/86 = 88%) and peak (89/86 = 103%).
<p>Total Cost Estimate for Maintenance/Restoration Activities for Lake Sabrina & South Lake</p>			<p>\$60,000</p>	

¹O&M estimates are for non-capital activities (e.g., restoration, signage, parking stall restriping)

ATTACHMENT C
CONSULTATION ON REVISED RRMP

From: Leong, Tristan -FS <tristan.leong@usda.gov>
Sent: Monday, November 28, 2022 8:56 AM
To: Finlay Anderson <finlay.anderson@kleinschmidtgroup.com>
Subject: RE: [External Email]RE: Updated RRMP / Filed Flow Measures

I think that's fine.



Tristan Leong
Hydroelectric Coordinator

Forest Service

Region 5 Public Services

p: 707-562-8838
c: 530-961-2155
tristan.leong@usda.gov

1323 Club Drive
Vallejo, CA 94592
www.fs.fed.us



Caring for the land and serving people

From: Finlay Anderson <finlay.anderson@kleinschmidtgroup.com>
Sent: Monday, November 28, 2022 8:54 AM
To: Leong, Tristan -FS <tristan.leong@usda.gov>
Subject: RE: [External Email]RE: Updated RRMP / Filed Flow Measures

Thank you Tristan – if its ok with you, I will make a statement to that effect and go ahead and file...

Talk to you later....

FMA

From: Leong, Tristan -FS <tristan.leong@usda.gov>
Sent: Monday, November 28, 2022 8:49 AM
To: Finlay Anderson <finlay.anderson@kleinschmidtgroup.com>
Subject: RE: [External Email]RE: Updated RRMP / Filed Flow Measures

Hi Finaly -

I was going to say later today that we didn't have any specific refinements or comments on the RRMP after review. I'm still waiting to touch base with our counsel regarding their meeting with SCE's.

Sorry for the delayed response.



Tristan Leong
Hydroelectric Coordinator

Forest Service

Region 5 Public Services

p: 707-562-8838
c: 530-961-2155
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Caring for the land and serving people

From: **Finlay Anderson** <finlay.anderson@kleinschmidtgroup.com>
Sent: **Monday, November 28, 2022 8:44 AM**
To: **Leong, Tristan -FS** <tristan.leong@usda.gov>
Subject: RE: [External Email]RE: Updated RRMP / Filed Flow Measures

Checking on this.. we are looking to push this to FERC next week...

FMA

From: Finlay Anderson <finlay.anderson@kleinschmidtgroup.com>
Sent: Wednesday, November 2, 2022 8:18 AM
To: Leong, Tristan -FS <tristan.leong@usda.gov>; Irons, Sheila -FS <sheila.irons@usda.gov>; Dirgo, Dannon - FS, BISHOP, CA <dannon.dirgo@usda.gov>; Barnett, Adam -FS <adam.barnett@usda.gov>
Cc: Kelly Larimer <Kelly.Larimer@KleinschmidtGroup.com>; Michael Harty <jmharty@kearnswest.com>; Matthew Woodhall <Matthew.Woodhall@sce.com>
Subject: Updated RRMP / Filed Flow Measures

All --

All- in case you had not seen it, attached is a copy of the filing notice for revised PME measures, including minimum instream flows and new recession flows. In the cover letter we allude to the RRMP as the outstanding item that we are working on with the FS.

The proposed draft of the RRMP that tracks with the Letter of Intent is attached. We have indicated to FERC that we would provide them with an updated plan by December 9. This proposed draft should be pretty close to ready, but we would take any suggested edits from the FS and request those edits **by the end of the month (November 30)**.

Thanks and let me know if you have any questions.

Finlay Anderson

Principal Consultant

Kleinschmidt

O: 971.345.0517 C: 503.329.3586

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Enclosure 2
Letter of Intent, dated October 12, 2022



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October 12, 2022

Lesley Yen
Forest Supervisor
U.S. Department of Agriculture, Forest Service
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514-3101

**Re: Bishop Creek Hydroelectric Project, FERC Project No. 1394
Letter of Intent for Addressing Recreation Facilities in the Federal Energy
Regulatory Commission's Relicensing of the Bishop Creek Hydroelectric Project**

Dear Supervisor Yen:

Southern California Edison Co. (SCE) appreciates the partnership we have forged together over many years of cooperative engagement with the U.S. Forest Service (USFS) with respect to our hydropower facilities located within Inyo National Forest (INF). Of SCE's four hydropower facilities located within INF, three projects—Bishop Creek Hydroelectric Project (FERC No. 1394) (Bishop Creek Project), Rush Creek Hydroelectric Project (FERC No. 1389), and Lee Vining Project (FERC No. 1388)—are currently in the process of being relicensed by the Federal Energy Regulatory Commission (FERC). Our fourth hydropower facility within INF, the Lundy Project (FERC No. 1390), will begin the relicensing process within the next couple of years. SCE certainly recognizes the intensive effort and commitment of resources needed for a successful relicensing effort, and we express our sincere appreciation to INF staff for supporting these efforts by devoting their time and expertise to ensure that these projects continue to meet stewardship responsibilities and values over their next license terms.

The purpose of this letter is to confirm our understanding related to capital improvements and operation and maintenance of USFS recreation facilities in and around the Bishop Creek Project. As you may be aware, after several years of environmental study and analysis, on June 29, 2022, SCE filed its Final License Application (Application) with FERC for relicensing the Bishop Creek Project.

In the Application, SCE recognizes that relicensing studies have identified a number of repair, upgrade, or enhancement needs at USFS recreation facilities in the vicinity of the Bishop Creek Project, as well as the need for a more programmatic approach to resolve issues such as parking availability, delineation, and circulation at all Project reservoirs. The Application includes a draft Recreation Resources Management Plan (RRMP) to address these needs. The draft RRMP included in the Application described the USFS recreation facilities that are associated with SCE's FERC license for the Bishop Creek Project, i.e., Lake Sabrina, South Lake, and Intake No. 2 Reservoir (collectively, the USFS Project Recreation Facilities), including facilities and



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amenities tables. In addition, the draft RRMP described the development of a Recreation Resources Management Implementation Plan (RRIP) within two years of license issuance, which would include specific recreational measures at the USFS Project Recreation Facilities to be undertaken by SCE. The RRMP also described the programmatic objectives of the RRIP, the overall phases and schedule for developing the RRIP, and the general contents requirements for the RRIP. For purposes of clarity, and at the request of USFS personnel, future versions of the RRMP will no longer reference the RRIP and will instead reference a “plan and schedule” for implementing the RRMP.

Because SCE’s Application proposed to develop specific recreation measures at the USFS Project Recreation Facilities, to be identified post-relicensing through the development of an implementation plan and schedule, SCE’s Application (Exhibit E, § 9.9.9) indicates: “no facility-specific improvements or management actions are proposed at this time.” Instead, in its cover letter to the Application, SCE stated:

SCE and the [USFS] continue to discuss the disposition of recreation facilities, and the anticipated use and need of those facilities under the new license. SCE anticipates providing an updated Recreation Management Plan (PME Measure 7, described in Appendix B of Exhibit E).

In furtherance of SCE’s commitment to FERC to continue its important work with respect to the USFS Project Recreation Facilities, as well SCE’s commitment to INF regarding other USFS recreation facilities in the vicinity of the Bishop Creek Project, this non-binding Letter of Intent (LOI) establishes SCE’s understanding of our work to date to provide a good-faith framework to resolve responsibilities for recreation facilities applicable to the Bishop Creek Project FERC license, as well as certain issues and facilities outside the existing Project Boundary that will be implemented in a separate off-license agreement, as follows:

1. Proposed License Recreational Measures

The USFS recreation facilities associated with the FERC license are located at three Project Reservoirs, Lake Sabrina, South Lake, and Intake No. 2 Reservoir, and shall be managed and maintained by SCE as Project Recreation Facilities under the FERC license for the Bishop Creek Project. Accordingly, the measures identified below will be implemented by new license measures under the following mechanisms:

- USFS will submit measures addressing these Project facilities to FERC as mandatory license conditions under section 4(e) of the Federal Power Act (FPA), 16 U.S.C. § 797(e); and
- SCE will include these measures in an updated RRMP submitted to FERC for inclusion in the license.

The license recreation measures for the Bishop Creek Project consist of the following:



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A. Recreation Resources Management Plan: General Requirements

- Within two years after FERC's issuance of the new license for the Bishop Creek Project, SCE will file the final RRMP for the Bishop Creek Project as approved by the Forest Service, with FERC.
- The RRMP will identify all SCE O&M (Operation and Maintenance) responsibilities for the Project Recreation Facilities. It is SCE's understanding that current O&M responsibilities are divided among USFS staff and operators of the marinas (Permit Holders) who are responsible for maintaining those facilities that provide access to the lake and which are necessary for public access, safety, and health. Based on these divisions of responsibilities, it is SCE's understanding that SCE's O&M responsibilities under the RRMP will exclude all activities that are undertaken by any Permit Holder.
- The RRMP will address the disposition, development, repair, or replacement of facilities as outlined in Paragraphs 1.B and 1.C below.
- In carrying out its responsibilities under Paragraphs 1.B and 1.C below, SCE will meet Architectural Barriers Act (ABA) accessibility requirements and Forest Service Outdoor Recreation Accessibility Guidelines standards based on previous facility condition and public accessibility reports, results of landscape architect analysis, and in consultation with the USFS and Forest Service Outdoor Recreation Accessibility Guidelines standards.
- SCE, when planning rehabilitation of specific recreation facilities under Paragraphs 1.B and 1.C below, will exercise reasonable efforts to maintain compatibility with other resource management plans, current USFS standards and guidelines for recreation sites and facilities, and take appropriate steps to address any inconsistencies.

B. Plans and Schedules for Project Reservoir Parking Constraints

- The RRMP will include the plan and schedule to programmatically address, within 10 years after approval of the final RRMP, parking constraints at Lake Sabrina, South Lake, and Intake No. 2 Reservoir. In meeting this obligation, SCE will retain a qualified landscape architect to accomplish the following:
 - Maximize parking capacity for day-use activities;
 - Prioritize reconfiguration of existing facility footprints;
 - Where existing footprint does not allow for adequate parking and/or the addition of sufficient spaces (size and/or number), complete appropriate environmental analysis, in consultation with USFS, to determine how and



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where additional space for parking may be provided to meet recreation needs;

- Each reservoir will be considered independently of the others when determining parking needs and appropriate solutions;
 - Address parking conflicts (day use, overnight, and trailer parking conflicts; pedestrian and vehicular traffic conflicts); and
 - Identify solutions for managing parking capacity on peak days.
- The RRMP will include a plan and schedule for SCE, within 2 years after approval of the final RRMP, to provide up to a maximum of ten additional campsites at Intake No. 2 Reservoir (or 40 persons at one time). Site selection, feasibility, and design of these additional campsites will incorporate input by a landscape architect. In addition, SCE, in consultation with USFS and the landscape architect, consider and prioritize the incorporation of new facilities near or in connection with the existing Intake 2 Campground.

C. Plan and Schedule for Project Reservoir Facilities Improvements and Enhancements

The RRMP will include a plan and schedule for SCE to complete, within 10 years after approval of the final RRMP, the following Recreation Facilities Enhancements at the USFS recreation facilities that are part of the Bishop Creek Project license:

- Intake No. 2 Reservoir
 - At the Intake No. 2 fishing pier, SCE will repair handrails and construct an ABA-compliant route to the pier and make any additional improvements to the pier for ABA-compliance.
 - At the Intake No. 2 informal bank fishing site, SCE will provide an ABA-compliant path from parking to the accessible pier and identify at least two existing shoreline access points to make accessible.
 - At the Intake No. 2 picnic area, SCE will replace picnic tables and BBQ grills (with appropriate fire clearances to comply with USFS Standards) and provide an ABA-compliant accessible path from parking to at least two ABA-compliant accessible picnic tables.
 - At the Intake No. 2 day use area, SCE will replace the existing derelict restroom with an ABA-compliant accessible precast vault toilet building.



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- At the Intake No. 2 campground, SCE will repair or replace to standard the campsite facilities noted in the REC 2 report as needing repair or replacement.
- Lake Sabrina
 - SCE will formalize the informal Inlet Trail to the mid-lake peninsula. SCE will post a sign at the trailhead to communicate that no camping is allowed outside of the developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness. SCE will also post a sign indicating the end of the formal trail at the mid-lake peninsula.
 - Regarding the Lake Sabrina boat launch, within the first two years of the new license term, SCE will consult with USFS on the scope and design of the boat ramp area and related facilities and will develop all facilities associated with the boat launch as mutually agreed to by SCE and USFS. SCE will provide an ABA-compliant route to the boat ramp from the ABA-compliant parking spot(s).
 - At the mid-lake informal camping sites, SCE will remove fire rings and other camp structures and rehabilitate any disturbance. SCE will install signage (as approved by the USFS) to inform the public that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.
 - At informal camping sites located at the southern end of the lake, SCE will remove fire rings and other camp structures and rehabilitate these areas. SCE will install signage to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.
- South Lake
 - Regarding the South Lake boat launch, within the first two years of the new license term, SCE will consult with USFS on the scope and design of the boat ramp area and related facilities and will develop all facilities associated with the boat launch as mutually agreed to by SCE and USFS. SCE will provide an ABA-compliant route to the top of the boat ramp from the ABA-compliant parking spot(s). SCE will repair, replace or improve the stairs to the launching pier, replace vehicular access gate.
 - Also, with respect to the South Lake boat launch, SCE will investigate the feasibility of expansion for use at low water levels. If USFS and SCE mutually agree that such expansion reasonably addresses recreational



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boating needs in a cost-effective manner that cannot be met at Lake Sabrina, SCE will complete the expansion as agreed to by USFS and SCE.

- SCE will replace three picnic tables at the lower South Lake picnic area.
- SCE will replace the existing restroom by the stairs to the launching pier with an ABA-compliant accessible precast vault toilet building, including an ABA-compliant route to toilet building from the pier.
- At the informal trail along the Green Creek diversion pipeline, SCE will install educational signage at the trailhead and at the end of the diversion pipeline to direct users along the USFS trail (and not along the pipeline). Additional signage may be needed where the pipeline crosses the USFS trail. SCE will also impede access to the informal pipeline trail to deter and discourage public use along this route.
- At informal camping sites located on the island at the southern end of the lake, SCE will remove fire rings and other camp structures and rehabilitate any disturbance. SCE will install signage to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.
- At informal camping sites located at the southern end of the lake, SCE will remove fire rings and other camp structures and rehabilitate any signs of disturbance. SCE will install signage to communicate that no camping is allowed outside of developed campgrounds and that a wilderness permit is required for overnight use in the John Muir Wilderness.

2. Off-License Recreational Measures

Other USFS recreational facilities are in the vicinity of the Bishop Creek Project but are not recreational facilities under SCE's FERC license for the Bishop Creek Project. These non-licensed recreation facilities include the Bitterbrush, Big Trees, Forks, and Bishop Park campgrounds. These facilities were enhanced, expanded, or created through funding provided by SCE under the current license. Presently, SCE and the USFS have reached an understanding that the USFS will not include any measures for these facilities in its FPA section 4(e) mandatory conditions, and SCE will not include these facilities in the RRMP for the Bishop Creek Project. Instead, SCE's commitment to provide funding support to INF for the recreation enhancements identified below will be established solely through a written agreement between SCE and USFS. A separate binding agreement will be drafted and executed to address the following off-license measures, within the schedule listed below.



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The term of the agreement between USFS and SCE will coincide with the term of the new FERC license term for the Bishop Creek Project, and will consist of the following commitments for off-license recreation enhancements:

- SCE will provide INF funding, in an amount to be mutually agreed upon by USFS and SCE, for purposes of rehabilitating a total of 60 campsites within the Bitterbrush, Big Trees, and Forks campgrounds. SCE anticipates that the dollar amount for this funding will not exceed \$500,000 (2022 \$).
- SCE will provide INF funding, in an amount to be mutually agreed upon by USFS and SCE, for purposes of: (1) completing enhancements to connector trails from Bishop Park group campground through the Intake 2 and Plant 2 campgrounds; and (2) improving and/or installing new signage along the connector trails. SCE anticipates that the dollar amount for this will not exceed \$20,000 (2022 \$).
- SCE's funding obligations under the off-license agreement will not include any operation and maintenance costs, USFS direct, indirect, administrative, or overhead costs.

3. Schedule and Conclusion

To formalize the on-license and off-license commitments in this LOI, SCE and the USFS will collaborate to complete the following activities by January 31, 2023.

Sequencing for Formalizing On-License Commitments:

- SCE to provide updated draft RRMP for review and comment by USFS
- USFS to provide draft set of FPA section 4(e) conditions for review and comment by SCE
- USFS to provide comments on updated draft RRMP
- SCE to provide comments on draft FPA section 4(e) conditions
- SCE to file updated draft RRMP with FERC
- USFS to file preliminary section 4(e) conditions with FERC

Sequencing for Formalizing Off-License Commitments:

- Schedule group discussion (as needed)
- SCE to provide initial draft agreement for USFS review
- USFS to provide comments on initial draft agreement to SCE
- Finalize and sign agreement

SCE appreciates this opportunity to work with INF in a good faith effort to resolve important recreational issues associated with the FERC relicensing of the Bishop Creek Project. We look forward to productive engagement in the coming months to formalize the commitments outlined in this LOI.

Should you have any questions or comments regarding this LOI, please contact Matthew Woodhall, Bishop Creek Project Lead, at 626-302-9596, or by email at



Energy for What's AheadSM

matthew.woodhall@sce.com. Otherwise, SCE respectfully requests INF to please respond, in writing, indicating its non-binding support for the commitments expressed in this LOI.

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Sincerely,

DocuSigned by:
Wayne Allen

106CF18A73D445F...
Wayne Allen

Principal Manager
Regulatory Support Services

cc: USFS: Philip Desenze; Sheila Irons; Tristan Leong; Adam Barnett; Dannon Dirgo