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LIST OF ACRONYMS

ACHP	Advisory Council on Historic Preservation
CDFW	California Department of Fish and Wildlife
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
DSOD	Department of Water Resources Division of Safety of Dams
ESA	Endangered Species Act
ESSLIA	East Shore Silver Lake Improvement Association, Inc.
FE	Federally Endangered
FERC	Federal Energy Regulatory Commission
FP	Fully Protected
FT	Federally Threatened
JLRPAC	June Lake Regional Planning Advisory Committee
NPS	National Park Service
Project	Rush Creek Project
SCE	Southern California Edison Company

SE	State Endangered
SSC	Species of Special Concern
ST	State Threatened
USFWS	United States Fish and Wildlife Service

5.0 PRELIMINARY ISSUES, DRAFT TECHNICAL STUDY PLANS, AND RELEVANT PLANS

5.1 INTRODUCTION

This section identifies preliminary issues, Draft Technical Study Plans, and comprehensive and resource management plans relevant to Southern California Edison Company's Rush Creek Project (Project). The Federal Energy Regulatory Commission's (FERC) content requirements for this section are specified in Title 18 of the Code of Federal Regulations (CFR) Chapter I § 5.6(d)(4). Additional information regarding the formal study plan development and implementation process is provided in the Relicensing Process Plan (Appendix A).

5.2 PRELIMINARY ISSUES

The Pre-Application Document identifies for FERC and other entities existing, relevant, and reasonably available information pertaining to the Project to help identify issues and related information needs; develop study requests and study plans; and provide the basis for analyzing potential Project impacts.

On March 15, 2021, SCE distributed a Project Information Questionnaire to over 200 stakeholders, including Federal and state resource agencies; local governments; Native American Tribes; non-governmental organizations; and other interested parties. The questionnaire requested assistance identifying existing, relevant, and reasonably available information to describe the existing Project environment; invited stakeholders to identify Project-related issues, concerns, or interests; and requested identification of data gaps or additional information needs for consideration during development of the relicensing studies. SCE asked that stakeholders return completed questionnaires by April 15, 2021.

SCE received responses from seven stakeholders (Appendix B). Five stakeholders identified general areas of interest and/or specific resource issues or concerns including: United States Fish and Wildlife Service (USFWS); California Department of Fish and Wildlife (CDFW); Department of Water Resources – Division of Dam Safety (DSOD); East Shore Silver Lake Improvement Association, Inc. (ESSLIA); and the June Lake Regional Planning Advisory Committee (JLRPAC). Two stakeholders only provide contact information and interest in participation in the relicensing including: National Park Service (NPS) and the Advisory Council on Historic Preservation (ACHP). Table 5-1 identifies the general resource areas in which each questionnaire responder had Project-related concerns or interests. Table 5-2 includes a summary of specific resource issues, concerns, interests, or study requests identified by stakeholders in response to the questionnaire.

5.3 DRAFT TECHNICAL STUDY PLANS

Based on existing Project operation and maintenance activities (Section 2.0); Proposed Project alternatives (Section 3.0); summary of existing information (Section 4.0); and responses to the Project Information Questionnaire (Appendix B), SCE developed the following 15 Draft Technical Study Plans for consideration in the relicensing proceeding.

The overall objective of the Draft Technical Study Plans is to address data gaps in existing information such that sufficient information is available to evaluate potential Project impacts and collaborate on the Proposed Project included in the License Application.

The Draft Technical Study Plans are organized into five major resource areas – Aquatic, Cultural, Land, Recreation, and Terrestrial as identified below. Each Draft Technical Study Plan is described in detail in Appendix C.

Aquatic Resources
AQ 1 – Instream Flow AQ 2 – Hydrology AQ 3 – Water Temperature AQ 4 – Water Quality AQ 5 – Geomorphology AQ 6 – Fish Population and Barriers AQ 7 – Special-status Amphibians
Cultural Resources
CUL 1 – Built Environment CUL 2 – Archaeology CUL 3 – Tribal
Land Resources
LAND 1 – Aesthetics LAND 2 – Noise
Recreation Resources
REC 1 – Recreation
Terrestrial Resources
TERR 1 – Botanical TERR 2 – Wildlife

5.4 RELEVANT QUALIFYING FEDERAL AND STATE COMPREHENSIVE PLANS

Section 10(a)(2)(A) of the Federal Power Act, 16 U.S.C. section 803 (a)(2)(A), requires FERC to consider the extent to which a project is consistent with Federal and state comprehensive plans for improving, developing, and conserving the waterways associated with a project. In addition, 18 CFR § 5.6(b)(2) requires that a potential applicant exercise due diligence in determining what information exists that is relevant to describing a project's existing environment, including review of Federal and state comprehensive plans filed with FERC and listed on its website.

The following describes the comprehensive plans that are relevant to the relicensing of the Project, based on a review of the FERC's September 2021 List of Comprehensive Plans and a review of other relevant planning documents. The effects of the Project activities will be evaluated with respect to each of these comprehensive plans during preparation of the

license application. The purpose of the evaluation will be to ensure that operation and maintenance of the Project; future decommissioning and retrofitting construction activities and associated restoration; and future enhancement of the lower Rush Creek channel are consistent with the goals and objectives outlined in these comprehensive plans.

5.4.1 Documents Identified on FERC's List of Comprehensive Plans

The FERC's List of Comprehensive Plans (FERC 2021) includes 13 planning documents which are relevant to the Rush Creek Project. These plans, as cited in the September 2021 list, are identified below. In some cases, updated versions of these documents are available and these are noted below with an asterisk (*) and the updated document is included for reference.

5.4.1.1 Federal Plans

- Forest Service. 1982. Comprehensive Management Plan for the Pacific Crest National Scenic Trail. Portland, OR. January 18, 1982.
- Forest Service.* 1988. Inyo National Forest Land and Resource Management Plan. Department of Agriculture, Bishop, California. August 1988.
 - Updated version: Forest Service. 2019. Land Management Plan for the Inyo National Forest: Fresno, Inyo, Madera, Mono, and Tulare Counties, California; Esmeralda and Mineral Counties, Nevada. Pacific Southwest Region. September.
- Forest Service. 1989. Mono Basin National Forest Scenic Area Comprehensive Management Plan. Department of Agriculture, Bishop, California.
- Forest Service. 2004. Sierra Nevada Forest Plan Amendment, Final Supplemental Environmental Impact Statement Record of Decision. Pacific Southwest Region. Department of Agriculture, Vallejo, California. January 2004.
- National Park Service. The Nationwide Rivers Inventory. Department of the Interior, Washington, D.C. 1993.
- U.S. Fish and Wildlife Service. n.d. Fisheries USA: The Recreational Fisheries Policy of the U.S. Fish and Wildlife Service. Washington, D.C.

5.4.1.2 State Plans

- California Department of Fish and Game. U.S. Fish and Wildlife Service. 2010. Final Hatchery and Stocking Program Environmental Impact Report/Environmental Impact Statement. Sacramento, California. January 2010.
- California Department of Fish and Game.* 2007. California Wildlife: Conservation Challenges, California's Wildlife Action Plan. Sacramento, California. 2007.

- Updated version: California Department of Fish and Wildlife. 2015. California State Wildlife Action Plan. Sacramento, California. 2015.
- California Department of Fish and Game. 2003. Strategic Plan for Trout Management: A Plan for 2004 and Beyond. Sacramento, California. November 2003.
- California Department of Fish and Wildlife. 2008. California Aquatic Invasive Species Management Plan. Sacramento, California. January 18, 2008.
- California Department of Parks and Recreation.* 1998. Public Opinions and Attitudes on Outdoor Recreation in California. Sacramento, California. March 1998.
 - Updated version: California Department of Parks and Recreation. 2014. Survey on Public Opinions and Attitudes on Outdoor Recreation in California. January.
- California Department of Parks and Recreation.* 1994. California Outdoor Recreation Plan. Sacramento, California. April 1994.
 - Updated version: California Department of Parks and Recreation. 2015. Statewide Comprehensive Outdoor Recreation Plan.
- California State Water Resources Control Board.* 2016. Water Quality Control Plan for the Lahontan Region. South Lake Tahoe and Victorville, California. January 2016.
 - Updated version: California State Water Resources Control Board. 2019. Water Quality Control Plan for the Lahontan Region. North and South Basins. October.

5.4.2 Other Relevant Management and Planning Documents

Five additional management / planning documents that are not included on the FERC's September 2021 List of Comprehensive Plans were also identified as being relevant to the Project. These documents are identified below.

5.4.2.1 Federal

- Forest Service. 2001. Ansel Adams, John Muir, and Dinkey Lakes Wilderness Management Plans.
- U.S. Fish and Wildlife Service. 2007. Recovery Plan for the Sierra Nevada Bighorn Sheep. California/Nevada Operations Office. Sacramento, California. September.

5.4.2.2 Local

- Mono County. 2020. Mono County General Plan. Mono County Planning Division, Mammoth Lakes, CA. 2020.
- Mono County. 2010. June Lake Area Plan, Community Development Element and Plan Safety Element.
- Great Basin Unified Air Pollution Control District. Current Rules and Regulations.

5.5 REFERENCES

FERC (Federal Energy Regulatory Commission). 2021. List of Comprehensive Plans. September.

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TABLES

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Table 5-1. Summary of General Resource Area Concerns or Interests Identified in Response to the Project Information Questionnaire

Resource Area	Questionnaire Respondent						
	ACHP	CDFW	DWR-DSOD	ESSLIA	JLRPAC	NPS	USFWS
Aesthetics				•	•		
Botanical and Wildlife		•		•			
Cultural							
Fish and Aquatics		•		•			
Geology and Soils				•	•		
Geomorphology				•			
Land Use							
Power Generation					•		
Rare, Threatened, and Endangered Species		•		•			•
Recreation				•	•		
Riparian and Wetland		•		•			
Socioeconomics				•	•		
Tribal							
Water Quality				•			
Water Use / Water Supply				•			
Other			•	•			

Notes:

ACHP = Advisory Council on Historic Preservation
 CDFW = California Department of Fish and Wildlife
 DSOD = Department of Water Resources Division of Safety of Dams
 ESSLIA = East Shore Silver Lake Improvement Association, Inc.
 JLRPAC = June Lake Regional Planning Advisory Committee
 NPS = National Park Service
 USFWS = United States Fish and Wildlife Service

Table 5-2. Summary of Specific Resource Issues and Concerns Identified in Responses to the Project Information Questionnaire

Stakeholder	Summary of Resource Issues / Areas of Concern
Advisory Council on Historic Preservation, John Eddins, PhD, Archaeologist / Program Analyst	<ul style="list-style-type: none"> No comments at this time
California Department of Fish and Wildlife, Alyssa Marquez, Environmental Scientist	<p>Fish and Aquatic Resources</p> <p>Effects to water quality and quantity, including temperature, due to Project operations and maintenance may adversely affect fish and aquatic resources as follows:</p> <ul style="list-style-type: none"> Benthic Macroinvertebrate diversity Amphibians and their habitat, including special-status species such as Yosemite toad and Sierra Nevada yellow-legged frog Diversity, quantity, and composition of fish species Fish spawning and habitat Dewatering of fish spawning habitat Introduction, persistence, and proliferation of aquatic invasive species Plant diversity, quantity, composition, and extent of wetland, riparian, and littoral habitats Management of Large Woody Debris <p>Wildlife Resources</p> <p>Project operations and maintenance may impact/disturb:</p> <ul style="list-style-type: none"> Migration, foraging, and nesting of bird species including special-status species such as: bald eagle (SE), northern harrier (SSC), loggerhead shrike (SSC), olive-sided flycatcher (SSC); and watch-list species such as osprey Movement, foraging, and reproductive habits of amphibian and mammal species, including special-status species such as: Yosemite toad (FT), Sierra Nevada yellow-legged frog (ST, FE), Sierra Nevada Bighorn sheep (FP, SE, FE), and Sierra Nevada red fox Bat colonies roosting within Project structures <p>Botanical Resources</p> <p>Project operations and maintenance may facilitate/impact:</p> <ul style="list-style-type: none"> Spread of invasive plant species Sensitive natural community types (e.g., aspen) <p>Rare, Threatened and Endangered Species</p> <p>Project may impact:</p> <ul style="list-style-type: none"> Reproduction, foraging, and movement/migration of Endangered Species Act (ESA) listed, California Endangered Species Act (CESA) listed, and State Fully Protected species as referenced above under the fish and aquatic, wildlife, and botanical resources

Stakeholder	Summary of Resource Issues / Areas of Concern
Department of Water Resources Division of Safety of Dams, Andrew Mangney, Field Engineering Branch Chief	<ul style="list-style-type: none"> • Safety of the dams and their appurtenances • Any work altering, repairing, or moving the dams or their appurtenance requires DSOD review and approval
East Shore Silver Lake Improvement Association, Mark Shoemaker, President	<ul style="list-style-type: none"> • Sedimentation of Rush Creek and Silver Lake directly affects ecological balance, fish and aquatic resources, endangered species, wetland habitats, and local economy • SCE dam activities impact recreational activities on Rush Creek and Silver Lake with sedimentation build-up impacting the ability of boats, anglers, kayaks, and paddle boards to navigate the waterways • Sedimentation may affect Los Angeles Department of Water and Power ability to access water for Los Angeles water needs in the foreseeable future • Bottom line – there is a need for dredging in the creek in the near future
June Lake Regional Planning Advisory Committee, David Rosky	<ul style="list-style-type: none"> • Consistent powerhouse noise (buzzing and humming) that can be heard in residential area since generator upgrades • Restore reasonable instream flows that track better with seasonal reservoir inflows and improves the aesthetic of Horsetail Falls • Legitimize recreational access through SCE lands to ice climbing areas near the Rush Creek Powerhouse • Silting in the creek channel and alluvial plain between the Rush Creek Powerhouse and Silver Lake which has increased flood potential to down-canyon residential areas and degraded river recreation • Modify the instream flow requirements to more closely mimic the natural hydrograph • Increased flood potential to down-canyon residential areas should license surrender be contemplated by SCE • Excessive helicopter use by SCE during recent/future construction activities
National Park Service, Stephen Bowes, Hydropower Relicensing Coordinator	<ul style="list-style-type: none"> • No comments at this time.
U.S. Fish and Wildlife Service, Chad Mellison, Fisheries Biologist	<ul style="list-style-type: none"> • Rare, Threatened, and Endangered Species

Notes:

- FE = Federally Endangered
- FP = Fully Protected
- FT = Federally Threatened
- SE = State Endangered
- SSC = CDFW Species of Special Concern
- ST = State Threatened

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