

Electronically Filed

August 29, 2019

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Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
825 First Street, N.E.
Washington, D.C. 20426

**Subject: Bishop Creek Hydroelectric Project, FERC Project No. 1394
Comments on Scoping Document 1 and Study Requests**

Southern California Edison Company (SCE) hereby files with the Federal Energy Regulatory Commission (FERC) its comments on FERC's Scoping Document 1 (SD1) regarding for the Bishop Creek Project (Project), FERC Project No. 1394. FERC issued SD1 on June 27, 2019; scoping meetings were held in the city of Bishop on July 30 and July 31, 2019. The intent of the scoping process is to ensure that all pertinent issues are identified and analyzed, and that the Environmental Assessment (EA) is thorough and balanced.

SCE reviewed SD1 and has the following comments in the context of the Technical Study Plans (Study Plans) that were included in Volume III of the Preliminary Application Document (PAD). As a result of the review, SCE noted potential effects that FERC identified that warranted modifications to the Study Plans to ensure the EA is complete. These included confirming that the scope of the cumulative effects analysis was addressed appropriately, a consideration of Project effects on macroinvertebrates, and that the potential for the spread of invasive mussels will be analyzed.

Section 4.2.2 of SD1 identifies the "Effects of Project operation and facilities on upstream and downstream fish passage, including entrainment and turbine mortality."

SCE Response: There are no native freshwater resident fish populations that are at risk from entrainment and turbine mortality, nor are there migratory fish species that are impacted by Project operations and facilities or require fish passage. Potential for entrainment impacts was studied in the previous relicensing of the Project and impacts were quantified for purposes of determining appropriate protection, mitigation and enhancement (PME) measures. Relevant fish agencies indicated that given their management priorities for Bishop Creek, updating these studies is not a priority. Agencies expressed a preference to focus on agreed-to studies that would assess the aquatic and fisheries health and have indicated a preference for basing PME's on recreational use and needs. The December 27, 1988 report was filed with FERC and is available upon request. SCE recommends removing this item as area of potential resource impact.

Section 5 of the SD1 discusses proposed studies to address issues identified in the Pre-Application Document (PAD). The Technical Study Plans (TSPs) were filed with the PAD; SCE has continued to work with stakeholders to update and improve the TSPs and have also cross-referenced the studies with SD1 to ensure the study results will support FERC's analysis of direct,

indirect, and cumulative effects. The updated TSP is included for your review along with an updated consultation summary and Response to Comments tables for each study.

On July 31, 2019, FERC held its Scoping Meeting pursuant to 18 Code of Federal Regulation (CFR) §5.11. At the meeting, there was dialogue with the State Water Control Board (SWCB) regarding the Water Quality Technical Study. As detailed in the consultation record attached to the revised TSP, these issues are identified and resolved as follows:

1. SWCB asked if Benthic Macroinvertebrate Index (BMI) could be added to the Water Quality Technical Study to assess aquatic health of the Project area.

SCE Proposed Resolution: SCE staff had subsequent follow up discussions with SWCB staff and proposed that issues of aquatic health be addressed through existing information, including ongoing riparian monitoring and already planned studies. SWCB staff agreed that due to the nutrient poor watershed and limited development, they do not anticipate any significant impacts on inverts from the Project; therefore, the proposed studies are sufficient to determine the Project's impacts on Bishop Creek without sampling for benthic macroinvertebrates (Consultation History, Appendix B to the TSP).

2. SWCB expressed the need for bacterial testing in the Water Quality Technical Study. Testing for bacterial contamination in the Project reservoirs was added to the TSP following the PAD and the Notice of Intent (NOI) submittal at the request of SWCB; at the Scoping Meeting, SWCB suggested that the testing should also include baseline assessments of diverted stream reaches.

SCE Proposed Resolution: During the meeting, SCE committed to discussing the scope of testing with SWCB. After additional discussions, SWCB confirmed that testing in the reservoirs is sufficient, and no testing in diverted stream reaches is necessary (Consultation History, Appendix B to the TSP).

Consistent with the proposed process plan and schedule identified in Section 2 of the PAD, SCE intends to expedite the Study Plan determination process by seeking a waiver of 18 CFR §5.11 and §5.12 of the FERC regulations. The waiver will summarize how each Study Plan addresses the comments that have been received to date, including issues identified in SD1, and how SCE addressed those comments.

SCE is pleased with the level of collaboration received to date from the members of the Bishop Creek Project's Technical Working Group and oversight teams and looks forward to developing the required information to support FERC's National Environmental Policy Act review. Should there be any questions or concerns regarding this filing please contact Matthew Woodhall, Senior Regulatory Advisor, by phone at (626) 302-9596 or via e-mail at matthew.woodhall@sce.com.

Kimberly D. Bose, Secretary
August 29, 2019
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Sincerely,

SOUTHERN CALIFORNIA EDISON COMPANY

A handwritten signature in black ink that reads "Wayne Allen". The signature is written in a cursive, slightly slanted style.

Wayne Allen
Principal Manager

Attachments:

- Revised Technical Study Plan
- Distribution list
 - FERC Service List
 - Email Distribution List

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