



Wayne P. Allen
Principal Manager
Regulatory Support Services

Filed electronically

November 21, 2025

Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

**Subject: Lee Vining Hydroelectric Project, FERC Project No. 1388;
USFWS Letter of Concurrence for *Pinus albicaulis* informal consultation**

Dear Secretary Reese:

On January 29, 2025, Southern California Edison Company (SCE) filed with the Federal Energy Regulatory Commission (FERC) a Final Application for New License for the Lee Vining Project (FERC Project No. 1388). On May 23, 2025, SCE submitted a draft Biological Assessment (BA) to the US Fish and Wildlife Service (USFWS) for review and comment; USFWS provided comments on July 3, 2025. SCE and the relicensing team met with USFWS on July 24, 2025 to discuss those comments and suggestions. The final BA was filed with both FERC and the USFWS on August 18, 2025¹.

The BA made a *no effect* determination for the Sierra Nevada bighorn sheep (*Ovis canadensis sierrae*) and Yosemite toad (*Anaxyrus canorus*) within the Lee Vining Project Area. For the whitebark pine (*Pinus albicaulis*), SCE made a determination of *may effect, but is not likely to adversely affect* the species. On November 19, 2025, USFWS issued a concurrence letter with this determination for whitebark pine, which we are including as Attachment 1 with this filing.

If you have any questions regarding this filing please contact Matthew Woodhall, SCE Relicensing Project Manager, by phone at (909) 362-1764 or via e-mail at matthew.woodhall@sce.com.

Sincerely,

DocuSigned by:

106CF18A73D445F...

Wayne P. Allen
Principal Manager

Enclosures:

- Attachment 1: November 19, 2025 USFWS concurrence letter

¹ FERC Accession number 20250813-5060



United States Department of the Interior

Pacific Southwest Region FISH AND WILDLIFE SERVICE

Reno Fish and Wildlife Office
1340 Financial Boulevard, Suite 234
Reno, Nevada 89502



November 19, 2025
File No. 2025-0154312
Sent by Email only

Debbie-Anne Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Dear Secretary Reese:

Subject: Informal Consultation for *Pinus albicaulis* within the Lee Vining
Hydroelectric Project Relicensing, Mono County, California.

We have reviewed your letter and Biological Assessment (BA) received August 18, 2025, regarding proposed relicensing for the Lee Vining Hydroelectric Project (Project) approximately nine miles upstream from Mono Lake and the town of Lee Vining, in Mono County, California. The Project is located primarily within the Inyo National Forest, with the remainder of the Project occurring on private land owned by Southern California Edison (SCE). The Federal Energy Regulatory Commission (FERC) is proposing to issue SCE a license under Project No. 1388, for continued operations and maintenance (O&M). The Project consists of three dams and reservoirs, an auxiliary dam, a flowline consisting of a pipeline and penstock, and a powerhouse. The Project would occur within occupied habitat for *Pinus albicaulis* (whitebark pine), a plant species that is federally listed as threatened pursuant to the Endangered Species Act (ESA; 79 FR 31878, 79 FR 32125). You have requested our concurrence with your *may affect, not likely to adversely affect* determination for the threatened *P. albicaulis*.

Proposed Action

FERC is proposing to issue SCE a new license for the continued O&M of the 11.25-megawatt Lee Vining Hydroelectric Project. The Project would provide hydroelectric generation to meet part of SCE's power requirements, resource diversity, and capacity needs. The Project consists of three dams and reservoirs, an auxiliary dam, a flowline consisting of a pipeline and penstock, and a powerhouse. The new license would allow for continued O&M of the facilities within the existing FERC Project Boundary and include minor alterations to the existing FERC Project Boundary. *Pinus albicaulis* occurs in and around the FERC Project Boundary. Pre-project surveys for *P. albicaulis* were conducted in 2022 and 2023. During O&M activities, occurrences of all five-needle pine species will be flagged and avoided.

Effects to *Pinus albicaulis*

The proposed project will occur within occupied habitat of *Pinus albicaulis*, however, the project will not impact individual *P. albicaulis* directly because plants will be flagged and avoided if found during pre-project surveys. Botanical surveys located 24 populations within the proposed project boundary with an estimate of 1,069 *P. albicaulis* plants. The FERC Project Boundary is 542.25 acres in size with 535.99 acres of U.S. Forest Service lands, and 6.26 acres of SCE lands. Project design incorporates measures to avoid direct effects to any *P. albicaulis* individuals. The proposed project includes the following avoidance and minimization measures:

- SCE will provide annual training to make workers aware of the locations and identification of *Pinus albicaulis* and its cones (or any other five-needle pine species, including sugar pine (*Pinus lambertiana*), foxtail pine (*Pinus balfouriana*), western white pine (*Pinus monticola*), and limber pine (*Pinus flexilis*)) in the Lee Vining FERC Project Boundary. Due to the difficulty in identifying to species, any five-needle pines found in the FERC Boundary will be avoided.
- SCE will create maps with clearly delineated known locations of *Pinus albicaulis* within routine O&M areas.
- For routine O&M work within the FERC Project Boundary in areas of known *Pinus albicaulis*, SCE crews will use existing roads and trails to access work areas. SCE will assign a biologist to survey the work area for *P. albicaulis* trees, cones, and seedlings and demarcate “no work zone” areas with bright-colored flagging or construction cones. The biologist will monitor the routine O&M activities to prevent impacts to *P. albicaulis*.
- For work near known *Pinus albicaulis* locations, the qualified biologist will also determine the location of *P. albicaulis* seed banks and, if located, flag the seed bank for avoidance and monitor the work activities to prevent impacts to *P. albicaulis* seed banks.
- SCE crews will only stage equipment, vehicle parking, or placement of other heavy equipment on pavement or existing roadway to avoid root zones of *Pinus albicaulis*.
- Maintenance and refueling of vehicles and equipment will only occur on paved areas or existing roadways.
- When performing any ground disturbance work within 50 feet of known *Pinus albicaulis* or any five-needle pine, SCE will demarcate a “no work zone” around the pines and their root zones with bright-colored flagging or construction cones. See Items 3 and 4 above.
- Ground disturbing activities require additional FERC approval; these activities would be evaluated on a project-by-project basis for impacts to *Pinus albicaulis* seed banks.
- Personnel will not collect or walk on *Pinus albicaulis* cones and will leave all *P. albicaulis* cones in place.
- Personnel will not remove or trim five-needle pine trees in or near *Pinus albicaulis* locations without identifying the tree to species.

Conclusion

The Service has reviewed the project description in your request for consultation, and we concur with your determination that the proposed project may affect, but is not likely to adversely affect *Pinus albicaulis*. Our concurrence is based on the project description including application of conservation measures, as well as the accompanying effects analysis provided by your office.

This concludes informal consultation on the proposed project under regulations promulgated in 50 CFR Part 402, which establish procedures governing interagency consultation under section 7 of the ESA. If this project changes from the description provided, or if new biological information becomes available concerning *Pinus albicaulis* which may be affected by the proposed project, your agency should contact us regarding reinitiating consultation.

Please reference File No. 2025-0154312 in any future correspondence concerning this consultation. If you have any questions or require additional information, please contact me or Sophia Heston at (775) 861-6300. Please note, we accept official correspondence at RFWOmail@fws.gov.

Sincerely,

Justin Barrett
Deputy Field Supervisor

Document Content(s)

20251121_P_1388_SCE_FERC_LV_USFWS_BA_Conccurence_CL.pdf	1
20251121 1388 SCE FERC Lee Vining Hydroelectric Project_Final_Letter	
Attach 1.pdf.....	2