SOUTHERN CALIFORNIA EDISON®
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Filed electronically

December 23, 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; SCE's Response to Scoping Comments

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). FERC filed a Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Project on October 1, 2025. FERC provided an opportunity for stakeholders to submit comments within 30 days of the Notice. Three stakeholders submitted comment letters to FERC: California Department of Fish and Wildlife (CDFW), California State Water Resources Control Board (SWRCB), and the Mono Lake Committee (MLC) all dated October 31, 2025 (Attachment 1).

SCE has reviewed these letters and developed a response document in which the comments are organized by theme (Attachment 2). A Final Revised Wading Suitability Memo is included as Attachment 3.

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:
Wayne Allen
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Wayne P. Allen
Principal Manager

Enclosures:

- Attachment 1: Comment letters from CDFW, MLC and SWRCB
- Attachment 2: SCE Responses to Stakeholder Scoping Comments
- Attachment 3: Final Revised Wading Suitability Memo

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ATTACHMENT 1

COMMENT LETTERS FROM CDFW, MLC, AND SWRCB

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE

Document Accession #: 20251223-5241 Filed Date: 12/23/2025

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C-220
Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

October 31, 2025

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
Division of Hydropower Licensing
888 First Street NE
Washington, DC 20426
Submitted via eSubscription

Subject: Comments Submitted by the California Department of Fish and Wildlife Regarding the Scoping Notice for the Relicensing of the Lee Vining Hydroelectric Project (FERC Project No. 1388-082)

Dear Ms. Reese,

The California Department of Fish and Wildlife (CDFW) has received and reviewed the Notice of Scoping and request for comments filed by the Federal Energy Regulatory Commission (FERC) for the relicensing of the Lee Vining Hydroelectric Project (Project, FERC No. 1388). The Notice of Scoping was filed by FERC on October 1, 2025. Pursuant to the Federal Power Act, 16 U.S.C. § 791(a)–825(r) CDFW is submitting the following comments to FERC in consideration of the analysis to be performed under the National Environmental Policy Act (NEPA) review process.

AUTHORITIES

CDFW is the relevant State fish and wildlife agency for resource consultation pursuant to the Federal Power Act Section 10(j) (16 U.S.C. section 803 (j)). The fish and wildlife resources of the State of California are held in trust for the people of the State by and through CDFW (Fish & G. Code § 711.7). CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (Fish & G. Code § 1802). Information generated through the appropriate studies will be utilized by CDFW in the development of recommendations.

The mission of CDFW is to manage California's diverse fish, wildlife, and plant resources, and the habitats on which they depend, for their ecological values and for their use and enjoyment by the public. It is the goal of CDFW to preserve, protect, and as needed, to restore habitat necessary to support native fish, wildlife, and plant species within the FERC-designated boundaries of the Project, as well as the areas adjacent to the Project in which resources are affected by ongoing Project operations, maintenance, and recreational activities.

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Draft License Application Comments

CDFW and other relicensing parties provided substantive comments on Southern California Edison (SCE)'s Draft License Application (DLA) raising concerns about potential impacts of hydro-resource optimization events on public safety, biological resources, and riparian habitat conditions. Specifically, CDFW's comments on the DLA submitted to FERC on November 20, 2024 (Attachment 1) included comments to the potential effects of hydro-resource optimization to water quality (turbidity), stream fish populations, and the quality and quantity of aquatic habitat.

In addition to the concerns raised regarding the potential effects of hydro-peaking or hydro-resource optimization (HRO) events CDFW requested the "FLA to include a [protection, mitigation and enhancement] PM&E measure that addresses the impacts Hydro-resource Optimization has on the aquatic environment" and provided suggested ramping rates based on peer reviewed studies (Higgins et al. 1995, Hunter 1992, and Olson and Metzgar 1987). CDFW requested that the intraday Hydro-resource Optimization model SCE developed as part of the Operations Model TSR (AQ-5) be used to understand implications for how much ramping rates would have to be adjusted to keep the stream reaches from experiencing less than two inches per hour of stage change.

No PM&E measure was included in the FLA to address the concerns raised by the relicensing parties. SCE's response to CDFW's request to use the intraday model to understand implications for implementing ramping rates states that:

"*SCE did use the intraday model to review the potential outcomes associated with maintaining potential stage changes at or below 2 inches per hour. When looking at the receding limb of high flows at 110 cfs and then back down to low flows of 27 cfs, the model shows that it would take SCE operations approximately 7 hours to reach base flows when maintaining no more than a 2-inch-per-hour stage change. This ramping rate would not be consistent with the operational goals of the Lee Vining Project and is therefore not being considered as a viable operational change.*"

The detailed results of this intraday modeling to address CDFW's request were not included in the final AQ-5 TSR or in any other sections of the FLA and it is unclear at what cross section(s) along Lee Vining Creek this modeling occurred or how it may improve public safety, minimize fish stranding, or benefit the stream ecology. In addition, there was no justification provided to support why this ramping rate would "not be consistent with the operational goals" as no financial analysis on implementing ramping rates were provided in the DLA or FLA.

Impacts on Fish Populations

SCE's Final License Application (FLA) asserts that "no stranding has ever been documented by SCE or by any of the agencies or other stakeholders in reference material compiled in the pre-application document," and concludes that "there are no adverse effects on fish and wildlife resources under the Proposed Action." This conclusion is based not on ecological evidence, but on the absence of direct observations, despite the fact that hydropeaking events often occur at night or during periods when field monitoring is not occurring.

Contrary to SCE's assertion, peer-reviewed literature and the project's own technical studies provide compelling evidence that HRO events can significantly impact resident fish populations in small, non-anadromous streams, similar to Lee Vining Creek. Zimmerman et al. (2010) found that hydropeaking in small Rocky Mountain streams led to frequent stranding of juvenile trout, particularly during winter and early spring when fish are less mobile and rely on shallow edge habitats. Similarly, Irvine et al. (2009) documented displacement and mortality of juvenile salmonids in British Columbia streams due to hydropeaking-induced flow fluctuations, even in the absence of long-term channel changes.

In the Lee Vining Project area, the AQ-2 Stream Fish Populations study documented multiple age classes of brown and brook trout in Lower Lee Vining Creek, including young-of-year (YOY), indicating that active spawning and rearing occur in the reach affected by HRO. SCE has asserted that because there are multiple age classes and YOY HRO does not have a significant impact on the fish populations, but this information does not indicate that there are no impacts, it just documents that these age classes are present and supports the potential for HRO events to impact these vulnerable age classes.

The AQ-6 Channel Morphology study identified that the substrate in the upper section of this reach is dominated by gravel, cobble, and boulders, conditions that increase the risk of stranding during rapid stage reductions. These findings align with Bradford (1997), who demonstrated that juvenile salmonids are highly susceptible to stranding on gravel bars and side channels during rapid flow reductions. Similarly, Higgins et al. (1995) found that juvenile coho salmon and rainbow trout experienced significant stranding during winter flow decreases, and that slower ramping rates reduced mortality. Additional studies, including Naudascher et al. (2024), confirm that juvenile trout exhibit fine-scale movement responses to hydropeaking and are vulnerable to stranding during rapid flow reductions. Nagrodski et al. (2012) further summarize the ecological consequences of stranding and highlight the need for mitigation strategies.

While SCE dismisses the need for ramping rate restrictions, the literature supports adaptive ramping strategies that consider seasonal life history stages. Hunter (1992) and Olson and Metzgar (1987) suggest that ramping rates of 1–2 inches per hour are

generally protective of juvenile salmonids. Saltveit et al. (2001) recommend slower ramping rates during winter and early spring to protect incubating eggs and newly emerged fry. Given the presence of YOY trout and the timing of HRO events, CDFW recommends that ramping rates be more gradual from December through April, with slightly higher rates potentially acceptable during summer months.

SCE's refusal to consider these measures, citing operational infeasibility without providing detailed modeling results or financial justification, is inadequate. The NEPA document should require a full assessment of the ecological and economic trade-offs associated with implementing ramping rates of 2" per hour and/or seasonal restrictions.

Impacts on Channel Morphology

SCE asserts in its FLA that "the channel bed is relatively mobile, there is no evidence of systematic aggradation or incision, and the channels are not incised, providing connection with the floodplain during floods." While this may be true at a broad geomorphic scale, this conclusion fails to address the acute, short-term impacts of HRO events on channel morphology in the reach immediately downstream of Poole Powerhouse.

The Lower Lee Vining Creek Channel Morphology Technical Study Report (AQ-6) characterizes the reach below Poole Powerhouse as a plane-bed and pool-riffle system with coarse substrates (gravel, cobble, and boulder) particularly in the upper portion near Big Bend Campground. These substrate conditions, combined with the confined nature of the channel and limited floodplain connectivity at base flows, make the reach highly susceptible to sediment mobilization during rapid flow fluctuations. The Aquatic Habitat Mapping and Sediment Characterization study (AQ-3) further identifies that gravels in this reach are "semi-active," indicating that they are mobile under moderate flow events, including those associated with HRO events.

The Aquatic Habitat Mapping and Sediment Characterization Study (AQ-3) provides further evidence that the reach below Poole Powerhouse is vulnerable to sediment disturbance. AQ-3 documents that spawning gravels in Lower Lee Vining Creek are primarily "semi-active," meaning they are mobile under moderate flow conditions. The study also notes a decline in spawning gravel quality from upstream to downstream, with the upper portion of the reach, closest to Poole Powerhouse, classified as having "good" to "poor" quality gravels. This spatial pattern suggests that sediment is being winnowed from the upper reach and transported downstream, a process likely exacerbated by frequent HRO events. These events cause abrupt increases and decreases in flow, which can entrain fine sediments and flush them from the channel bed, reducing the availability of clean, well-sorted gravels necessary for successful trout spawning and macroinvertebrate colonization. These findings are consistent with Bipa et al. (2024), who reviewed 155 studies and found that hydropeaking alters sediment dynamics and increases substrate embeddedness. Hillman et al. (1987) and Figueiredo

et al. (2021) also report that hydropeaking degrades spawning habitat by mobilizing fine sediments and reducing gravel quality. The EPA (2021) notes that turbidity pulses caused by sediment disturbance can impair fish behavior and habitat quality. The observed winnowing and downstream fining of substrate is consistent with the geomorphic signature of hydropeaking and should be evaluated as a cumulative impact of Project operations.

Hydropeaking events from Poole Powerhouse can cause stage increases of over 1.2 feet in as little as four minutes, as documented in the Wading Suitability Memorandum (Appendix E.5 of the FLA). These rapid changes in flow can mobilize fine sediments and disturb the channel bed, leading to increased turbidity and potential scour of spawning gravels. The Water Quality Technical Study Report (WQ-1) recorded turbidity spikes of up to 20 NTU above baseline during HRO events—exceeding the Lahontan Basin Plan's objective of no more than a 10% increase above natural levels. These turbidity pulses are a direct indicator of sediment disturbance and transport, which can degrade aquatic habitat and reduce interstitial space critical for egg incubation and macroinvertebrate colonization.

SCE's conclusion that there are no adverse effects on channel morphology is based on the absence of long-term incision or aggradation, but this overlooks the ecological consequences of repeated short-term disturbances. Frequent mobilization of sediment during HRO events can disrupt sediment sorting, destabilize riffle-pool sequences, and reduce habitat complexity. These impacts are particularly concerning during winter months, when brook and brown trout eggs are incubating in redds that may be vulnerable to scour.

Given the frequency of HRO events during the winter season and the presence of semi-active spawning gravels in the affected reach, CDFW recommends that the NEPA document prepared by FERC include a detailed assessment of the geomorphic impacts of hydropeaking below Poole Powerhouse. This assessment should consider not only long-term channel trends but also the cumulative effects of short-duration, high-magnitude flow fluctuations on sediment transport, habitat stability, and aquatic life.

Impacts on Macroinvertebrates

SCE's FLA does not address the impacts of HRO on benthic macroinvertebrate communities, despite their critical role in aquatic food webs and their sensitivity to flow variability. Numerous studies have shown that hydropeaking disrupts macroinvertebrate assemblages by altering substrate stability, dewatering riffles, and creating ephemeral habitats that are unsuitable for colonization. Kennedy et al. (2016) found that hydropeaking in small mountain streams reduced macroinvertebrate richness and abundance, particularly among taxa with limited mobility or longer life cycles. Bruno et al. (2013) demonstrated that frequent flow fluctuations led to a dominance of

opportunistic, short-lived taxa and a decline in sensitive species such as Ephemeroptera, Plecoptera, and Trichoptera (EPT).

In the Lee Vining Project area, the AQ-6 study notes that rapid stage changes can create isolated pools and dewatered margins. These conditions are inhospitable to macroinvertebrates and can lead to local extirpation of sensitive taxa. The resulting simplification of the benthic community reduces the availability of high-quality prey for fish and undermines the ecological integrity of the stream. Bruno et al. (2013) found that abrupt flow changes cause catastrophic and behavioral drift in benthic invertebrates. Ruhi et al. (2018) observed that altered flow regimes filter out taxa with non-adaptive traits, while Suttle et al. (2004) demonstrated that increased fine sediment loads shift communities toward burrowing taxa, reducing prey availability for fish. These findings are echoed in Bipa et al. (2024), which highlights hydropeaking's broad impacts on aquatic food webs.

Given the importance of macroinvertebrates as a foundational component of the aquatic food web and their sensitivity to flow variability, CDFW recommends that the NEPA document prepared by FERC include a comprehensive assessment of the impacts of HRO events on benthic macroinvertebrate communities. This assessment should evaluate how frequent and abrupt flow fluctuations affect macroinvertebrate diversity, abundance, and functional composition, and how these changes in turn influence the productivity and resilience of the fishery. Because macroinvertebrates serve as a primary food source for trout and other fish species in Lee Vining Creek, disruptions to their populations may have cascading effects on fish growth, survival, and overall ecosystem health. CDFW further recommends that FERC consider flow management strategies, including ramping rate restrictions and seasonal protections, to minimize these impacts and support a biologically sustainable fishery.

Public Safety

SCE's FLA acknowledges that HRO events can cause rapid and substantial stage changes in Lower Lee Vining Creek. According to the Wading Suitability Memorandum (Appendix E.5 of the FLA), flows can increase from 10 to 110 cubic feet per second (cfs), resulting in stage changes of up to 1.29 feet in as little as four minutes. These abrupt changes pose a significant risk to public safety, particularly for children and other vulnerable recreationists using the stream corridor near Poole Powerhouse.

SCE's updated Wading Suitability Memorandum, presented during the August 6, 2025 stakeholder meeting, concludes that even under higher baseflows without powerhouse operation, the channel is unsuitable for pre-school children. With powerhouse operation, the upstream-most cross section (XS 4616) may be unsuitable for all users. While SCE references safety thresholds from Mosley (1983) and USGS (1997) to evaluate wading conditions, the analysis assumes that children are not recreating independently in Lower Lee Vining Creek. This assumption is unrealistic. In family camping settings,

such as those at Big Bend and Aspen Campgrounds, children often play near streambanks without direct supervision. The rapid stage changes documented in the Memo, particularly at upstream cross sections, increase the likelihood of sudden inundation and swift currents that could endanger unsuspecting users.

To address these risks, SCE currently maintains two warning signs near the Poole Powerhouse tailrace and proposes to install additional signage at kiosks in nearby campgrounds. While CDFW appreciates this acknowledgment of risk, signage alone is insufficient to mitigate the actual hazard posed by HRO events. Passive warnings do not prevent exposure to dangerous conditions, especially when flow changes occur rapidly and without real-time notification.

Other hydroelectric projects have implemented more robust public safety measures, including audible alarms, flashing lights, and real-time alerts to notify recreationists of impending flow changes. CDFW recommends that the NEPA document prepared by FERC include a comprehensive assessment of the public safety risks associated with HRO and evaluate the feasibility of implementing active warning systems. Additionally, ramping rate restrictions should be considered as a direct mitigation measure to reduce the velocity and magnitude of stage changes, thereby minimizing the risk to public safety.

Additional Study Request

On March 28, 2025 CDFW submitted an additional study request rates pursuant to section 4.32(b)(7) of 18 C.F.R. This study request was submitted to assess the feasibility of Southern California Edison (SCE) to implement ramping rates to address CDFW's concerns regarding the potential impacts from hydro-resource optimization. On August 6, 2025 SCE met with stakeholders to discuss the additional study requests and on August 13, 2025 SCE filed a letter with FERC containing the meeting materials from the August 6th meeting.

At the August 6, 2025 meeting, SCE responded to comments and additional study requests submitted by CDFW, the State Water Resources Control Board (SWRCB), and the Mono Lake Committee (MLC). In its response, SCE addressed concerns related to potential impacts from hydro-resource optimization on the following:

1. Recreationist safety
2. Turbidity
3. Fish stranding

Although both CDFW and MLC submitted additional study requests pursuant to 18 C.F.R. § 4.32(b)(7), SCE did not provide the results from the requested additional study requests made by either CDFW or MLC.

SCE offered limited information assessing the feasibility of implementing ramping rates and stated that their "capacity to optimize is limited by water availability." They also noted that they were "unable to look at all requested scenarios; however, SCE did analyze the addition of two time-steps and the 2-inch-per-hour stage change."

In this analysis, SCE concluded that the addition of these time steps would result in an approximate 25% decrease in the Project's economic value, which they deemed unsustainable for the Lee Vining Project. However, SCE also stated that the flow scenario involving a ramp from "10–110 cfs has occurred only 3% of the time during the fall and winter seasons since 2015."

From the information provided, the capacity to optimize being limited by water availability seems to reference the magnitude of HRO events, not the frequency, as historically, HRO events have occurred daily, as observed in the Poole Powerhouse outflow data in Figure 1 below, shared with the relicensing parties on August 22, 2025. In addition to the 15-minute data shared on August 22, , SCE shared a table that's states there has only been 1 identified occurrence of a hydro-resource optimization event in the fall and the winter that the flow changed by 100 cfs or greater. This table is clearly misleading to the frequency and magnitude of HRO events, as demonstrated in Figure 1 below.

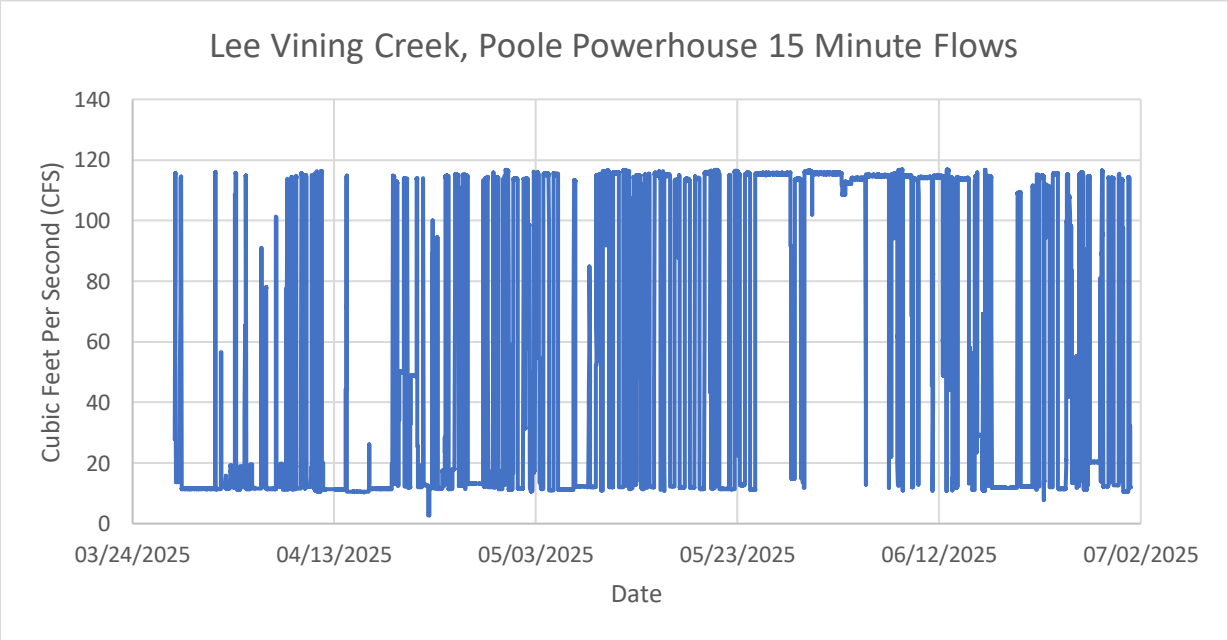

Figure 1: Outflow from the Poole Powerhouse during a normal water year from March 28th to July 1st 2025.

During the August 6 meeting, CDFW and other stakeholders requested additional information explaining how SCE calculated the 25% economic impact. During the October 9 meeting, SCE presented data indicating that future operational upgrades will

enhance their ability to respond to more gradual power transition requests from the California independent system operator (CAISO). SCE also expressed a commitment to improving the availability of real-time operational data that could enable the Los Angeles department of water and power (LADWP) to more effectively respond to hydropower optimization. This, in turn, may support improved downstream flow regulation and reduce the frequency of peaking events in lower Lee vining Creek. During the October 23 meeting SCE shared that although they do not believe there are any impacts from HRO, they proposed to include a PM&E measure that would apply to large magnitude HRO events by implementing ramp up and ramp down rates. While the improved ramping rates and communication protocols are anticipated to benefit Lee vining Creek, SCE has only been committing to better meeting the CAISO demand curve, which ramps up and down over approximately 30 minutes, and do not take into account the potential impacts HRO events have on Lower Lee Vining Creek. CDFW appreciates that SCE has been willing to continue conversations regarding HRO, but to date SCE has not acknowledged that HRO may have impacts within their Project and has not proposed an detailed PM&E measure(s) into its forthcoming license that would ensure adequate resource protection and continuation of these improvements over the license term.

CDFW does not believe that the information presented at the August 6, October 9, and October 23rd meetings adequately addresses the additional study request outlined in our March 28, 2025 letter or the potential environmental impacts highlighted in this letter. Therefore, CDFW requests that the NEPA document prepared by FERC include an assessment of the economic impacts of limiting hydro-resource optimization, whether through ramping rates or seasonal restrictions.

Minimum Instream Flow Requirements Below Poole Powerhouse

CDFW has reviewed the proposed minimum instream flow (MIF) requirements for Lee Vining Creek below Poole Powerhouse as described in Exhibit B of the Final License Application (FLA), as well as the language included in Appendix A of the existing license. These requirements, which continue the existing MIF regime, vary by season and are determined annually in consultation with the U.S. Forest Service. If agreement is not reached, default minimums of a continuous flow of 27 cubic feet per second (cfs) from August through May and 89 cfs during June and July apply, or the natural flow, whichever is less.

While CDFW supports the establishment of MIFs to protect aquatic resources, the current language in the FLA lacks clarity and may be insufficient to ensure ecological protection, particularly in the context of frequent and abrupt Hydro-Resource Optimization (HRO) events. These events can cause rapid fluctuations in flow that undermine the ecological benefits of MIFs, even when average flow targets appear to be met.

CDFW has reviewed 15-minute flow data from October 2009 onward and found that flows frequently fall below the continuous 27 cfs minimum, especially during the months of August through May. These low flows, when combined with abrupt changes caused by HRO operations, may reduce habitat availability, increase the risk of fish stranding and egg desiccation, elevate water temperatures, and impair macroinvertebrate communities. Moreover, it appears that the higher summer MIF of 89 cfs is rarely achieved, raising concerns about its enforceability under current operational conditions.

The FLA does not specify whether the MIFs are to be met as instantaneous, hourly, or daily averages. The existing license states that, 'the Licensee shall maintain each year a continuous, minimum flow," in which CDFW interprets "continuous" to imply instantaneous. This distinction is critical for biological protection, particularly during sensitive life stages such as spawning, incubation, and fry emergence. Averaging over longer periods may allow for short-term flow reductions that could strand fish or dewater habitat, even if the daily average appears compliant.

Additionally, the phrase "natural flow" is undefined in the FLA and the existing license. It is unclear how this term is calculated, what data sources or models are used, and whether it reflects pre-project hydrology, unregulated inflow, or a modeled baseline. This ambiguity creates uncertainty in how compliance will be determined and enforced.

Given these concerns, CDFW requests that the NEPA document prepared by FERC include a comprehensive assessment of the proposed MIFs. This assessment should evaluate historical compliance with the 27 cfs and 89 cfs thresholds, clarify if the MIF is instantaneous or the averaging period used to determine compliance, and require a transparent methodology for calculating "natural flow." Furthermore, the analysis should consider how HRO events interact with MIF implementation and whether the proposed flow regime is sufficient to protect aquatic resources under the range of hydrologic conditions.

Fish Stocking

CDFW had discussed fish stocking with SCE during multiple PM&E meetings (7/16/2025, 8/1/2025, 10/22/2025, 11/8/2025, 11/21/2025, 12/12/2025) leading up to the FLA, but has not been able to come to an agreement with SCE on the amount of stocking that should be required to offset project impacts. In the FLA Volume II, Appendix E.1 the PME-2, Enhanced Fish Stocking states "To offset entrainment and enhance a portion of the recreational fishery, Southern California Edison (SCE) proposes to stock 2,000 catchable rainbow trout or its equivalent (not to exceed 1,000 pounds of fish) to Project reservoir(s) annually. Stocking location(s) and timing will be determined annually in consultation with the California Department of Fish and Wildlife."

CDFW appreciates the change in stocking language from the previous license and acknowledgement that there are impacts to the fisheries via entrainment as well as a

need to enhance a portion of the recreational fishery, but disagrees with what SCE determined their stocking responsibility is within the Project area. Further, SCE did not provide any justification to what their responsibility is regarding the "enhanced recreation" component to their proposed stocking amounts. Below, CDFW has outlined the current stocking efforts within the Project area and justifications for the amount of stocking SCE should be responsible for to be assessed under the NEPA process.

SCE Responsibility for Fish Stocking in the Lee Vining Creek Project Area

The previous fish stocking agreement between SCE and CDFW required SCE to provide funding to offset fish entrainment at Ellery Lake. Specifically, SCE contributed reimbursed 12% of the total amount stocked by CDFW in Ellery Lake—equivalent to about $2,400 annually. This agreement was implemented as an alternative to installing a fish screen at the Ellery Lake outlet. However, this arrangement did not account for the broader recreational benefits created by the Project, nor was it informed by updated entrainment studies, as none were conducted during the recent relicensing process.

Recreational Fishing Enhancement as a Project Impact

The enhancement of recreational fishing opportunities in the Project reservoirs is consistent with the management objectives of both the U.S. Forest Service and CDFW. The Project increases the surface area and accessibility of Saddlebag, Tioga, and Ellery Lakes, and provides associated infrastructure such as roads and campgrounds that facilitate public use. These improvements have made the reservoirs more attractive and accessible to anglers, increasing fishing pressure and public expectations for a high-quality recreational fishery.

Currently, CDFW stocks all three Project reservoirs, as well as three reaches of Lee Vining Creek. In 2024, CDFW stocked a total of 9,400 pounds of catchable trout across the three reservoirs. That same year, SCE conducted a creel survey as part of its relicensing studies. The survey found that the Catch Per Unit Effort (CPUE)—a standard metric for evaluating fishery performance—ranged from 0.64 fish/hour at Saddlebag Lake to 0.79 fish/hour at Tioga Lake, with an average CPUE of 0.69 fish/hour across all three reservoirs.

CDFW's management target for CPUE is 1.0 fish/hour, meaning that an angler should, on average, catch one fish per hour of effort. The 2024 results clearly indicate that current stocking levels are insufficient to meet this target, despite a relatively high stocking year. This suggests that the existing fish stocking program is not keeping pace with the recreational demand generated by the Project.

Need for an Updated Stocking Agreement

A revised and more comprehensive fish stocking plan is needed to address two key issues:

Offsetting Fish Entrainment:
Project operations result in fish entrainment, particularly at Ellery Lake. Based on previous estimates, entrainment losses are approximately 12% of the stocked fish. The target stocking allotment is 7,000 pounds annually in Ellery Lake, which equates to 840 pounds of fish per year, or roughly 1,680 catchable trout, that are lost due to entrainment. SCE should continue to be responsible for offsetting this loss through an updated stocking agreement.

Enhancing Recreational Fishing Opportunities:
The Project has significantly enhanced recreational access and use of the reservoirs, which in turn increases the demand for a productive fishery. The 2024 creel survey results suggest that to achieve the target CPUE of 1.0, approximately 13,623 pounds of fish would need to be stocked annually across the three reservoirs (calculated as 9,400 lbs / 0.69 CPUE).

Historical data from 2017 to 2024 show that CDFW has averaged 8,268 pounds of fish stocked annually in the reservoirs. This average does not include years when stocking was reduced or suspended due to COVID-19 or hatchery-related issues (e.g., bacterial outbreaks). Even in optimal years, CDFW's capacity falls short of what is needed to meet the CPUE target.

To close this gap and meet the recreational fishery objectives, SCE should be responsible for stocking 5,355 pounds of fish annually (13,623 lbs target – 8,268 lbs CDFW average). This contribution would be proportional to the increased recreational use and expectations created by the Project's infrastructure and operations.

SCE's current contribution to fish stocking is based solely on outdated entrainment estimates and does not reflect the broader recreational impacts of the Project. A revised stocking plan should:

- Maintain the 12% entrainment offset at Ellery Lake (840 lbs/year).
- Include an additional 5,355 lbs/year to support recreational fishing consistent with Forest Service and CDFW goals.

This approach ensures that SCE's responsibilities are aligned with both the biological impacts of the Project and the enhanced recreational benefits it provides to the public.

Given the information presented above, CDFW recommends that the following fish stocking measure be included in the NEPA document as a compensatory mitigation measure to address fish losses associated with project operations. This measure is intended to offset impacts such as entrainment, reduced habitat quality, and diminished

fishery productivity, as well as to support enhanced recreational fishing opportunities resulting from increased public access and infrastructure provided by the Project.

SCE will stock 10,000 catchable trout[1], or its equivalent (5,000 pounds), for placement in the Project area annually; the location and timing for placement will be determined in consultation with CDFW. The 10,000 catchable trout may range in size and weight depending on availability of fish and needs identified through consultation. SCE will use the following measures to implement this Plan:

- *Provide resource agencies a proposal for annual stocking allotment to fulfill consultation obligation*
- *Obtain and release 10,000 catchable trout for stocking (or the equivalent of 5,000 pounds) in the Project area as approved in the annual proposal*
- *Obtain all required permits from relevant resource agencies prior to release of fish in Project reservoirs*
- *Submit a memorandum of stocking activity to FERC and CDFW within 30 days after distribution of fish in Project reservoirs*

  Fish will be transported to the release sites by a licensed vendor. SCE will release the stocked fish following proper fish-handling procedures and protocols.

Potential Project Impacts Outside the FERC Project Boundary

CDFW and other interested parties have expressed ongoing concern regarding potential impacts to lower Lee Vining Creek, particularly in the reach immediately downstream of Los Angeles Department of Water and Power's (LADWP) Lee Vining Conduit (LVC) diversion. The studies SCE conducted as part of the relicensing process included Lower Lee Vining Creek from Poole Powerhouse downstream to the LVC diversion, but SCE did not assess potential impacts below the LVC, citing that the operation of the LVC plays a substantial role in the ecological health of Lee Vining Creek below the LVC.

The reach of Lee Vining Creek from the LVC to Mono Lake exhibits a diverse and evolving channel morphology shaped by both natural processes and historical regulation. The upper portion of this reach flows through a moderately confined channel with coarse substrates, including cobble and gravel, supporting riffle-pool sequences and limited side-channel development. As the creek descends toward Mono Lake, it transitions into a broader alluvial valley with more complex morphology, including multiple active channels, floodplain features, and depositional bars. These lower segments support a mosaic of riparian vegetation, including willows, cottonwoods, and herbaceous understory, which contribute to bank stability and habitat complexity.

[1] "Catchable trout" is understood to be between 6.0 and 1.0 fish per pound. Most frequently this will be 2.0 fish per pound (approximately 12 inches in length).

Ecologically, the reach provides habitat for brown and rainbow trout, benthic macroinvertebrates, and riparian-dependent wildlife. Habitat quality varies with flow conditions, with deeper pools and undercut banks offering critical holding and foraging areas for trout, while off-channel features and floodplain connectivity enhance productivity and biodiversity during higher flows (McBain and Taylor, 2010).

The restoration goals for lower Lee Vining Creek, as established by the State Water Resources Control Board's Decision 1631 and Order 98-05, aim to reestablish a functional, self-sustaining stream ecosystem with healthy riparian vegetation and a trout fishery in good condition. These goals are pursued through a flow regime designed to mimic natural hydrologic patterns, support geomorphic processes, and maintain ecological integrity. The amended licenses require LADWP to implement Stream Ecosystem Flows (SEFs) that include both seasonal flow variability and baseflow thresholds. Specifically, no diversions are allowed when flows are below 30 cfs, to preserve shallow groundwater levels critical for riparian vegetation, or above 250 cfs, to ensure that high flows perform essential geomorphic functions such as sediment transport and floodplain inundation. To prevent ecological disruption, ramping rates are also prescribed: flow increases or decreases must not exceed 20% per day, and during sudden events like winter floods, hourly ramping rates of 10–20% are recommended. These operational constraints are intended to reduce the risk of fish stranding, maintain habitat connectivity, and support long-term channel and floodplain recovery.

Unfortunately, LADWP has not been able to meet these prescribed ramping rates, citing the sudden fluctuations caused by SCE's HRO events are so large that they are not buffered by LADWPs LVC diversion forebay. The Scoping Notice Comment Letter submitted by the Mono Lake Committee on October 31, 2025 supports this claim and provides substantial evidence that HRO events are frequently not buffered by the LVC and occur in the reach from the LVC to Mono Lake.

Given the documented frequency and magnitude of HRO events originating from Poole Powerhouse, and the inability of LADWP's LVC diversion infrastructure to buffer these rapid flow fluctuations, CDFW requests that the NEPA document prepared by FERC include an assessment of the potential ecological impacts of HRO events in lower Lee Vining Creek downstream of the LVC. This reach supports sensitive aquatic and riparian resources and is currently subject to flow regimes that may not align with the restoration goals established under State Water Board Decision 1631 and Order 98-05. The analysis should evaluate how unbuffered HRO-driven flow changes affect habitat stability, sediment transport, riparian vegetation, and aquatic species, particularly in light of the prescribed ramping rate limitations and baseflow thresholds.

CONCLUSION

CDFW appreciates the opportunity to provide comments on the Scoping Notice for the Lee Vining Hydroelectric Project. We look forward to continued coordination with FERC, SCE, and the relicensing participants.

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If you have any questions pertaining to this letter, please contact Graham Meese, Senior Environmental Scientist, at (760) 996-7387 or Graham.Meese@wildlife.ca.gov.

Sincerely,

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November 20, 2024

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Subject: Comments from the California Department of Fish and Wildlife on Southern California Edison's Draft License Application for the Relicensing of the Lee Vining Hydroelectric Project, FERC Project No. 1388

Dear Ms. Reese,

The California Department of Fish and Wildlife (CDFW) has received and reviewed the Draft License Application (DLA), filed by Southern California Edison (SCE) for the relicensing of the Lee Vining Hydroelectric Project (Project, FERC No. 1388). The DLA was filed by SCE with the Federal Energy Regulatory Commission (FERC) on August 27, 2024. Pursuant to 18 CFR §5.16(e), CDFW is providing comments and recommendations on the DLA below.

AUTHORITIES

CDFW is the relevant State fish and wildlife agency for resource consultation pursuant to the Federal Power Act Section 10(j) (16 U.S.C. section 803 (j)). The fish and wildlife resources of the State of California are held in trust for the people of the State by and through CDFW (Fish & G. Code § 711.7). CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (Fish & G. Code § 1802). Information generated through the appropriate studies will be utilized by CDFW in the development of recommendations.

The mission of CDFW is to manage California's diverse fish, wildlife, and plant resources, and the habitats on which they depend, for their ecological values and for their use and enjoyment by the public. It is the goal of CDFW to preserve, protect, and as needed, to restore habitat necessary to support native fish, wildlife, and plant species within the FERC-designated boundaries of the Project, as well as the areas adjacent to the Project in which resources are affected by ongoing Project operations, maintenance, and recreational activities.

COMMENTS ON DRAFT LICENSE APPLICATION (DLA)

General Statement

CDFW's comments provided in this letter mainly consider studies that were complete and had final technical study reports (TSRs) issued and filed with the DLA. CDFW has not completed a full review of some studies which were not complete or with TSRs that were not finalized at the time of the DLA filing. CDFW's DLA comments also reflect and respond to some discussions with SCE and other Relicensing Participants during meetings or email exchanges with respect to the ongoing protection, mitigation, and enhancement measures (PM&E measures) discussions for some resources. CDFW will provide additional comments on any outstanding studies and accompanying project impact analyses when these TSRs are finalized, and the impacts are analyzed under the Final License Application (FLA) and these documents are filed with FERC.

Specifically, CDFW does not provide comments in this letter on the following study as this study was either not complete or the technical memorandums had not been finalized when Licensees filed the DLA with FERC:

- Recreation Use Assessment (REC-1)

The FERC Project Relicensing Participants (SCE, CDFW and other Technical Working Group Members, henceforth abbreviated as RP) have been meeting for several months to determine if there are areas where collaborative agreement can be reached on protection, mitigation, and enhancement measures that would be included in the new FERC license. CDFW plans to continue to work with the Licensee and other RPs to determine where protection, mitigation, and enhancement measures can be agreed upon before the filing of the FLA.

DLA Volume I: Initial Statement

Information Required Pursuant to 18 CFR §4.51 (a)(1)

Pursuant to 16 U.S.C. § 808(e) any license issued by FERC shall be for a term of no less than 30 years and no more than 50 years from the date the license is issued. CDFW's understanding is that FERC generally issues new licenses for more than 30 years if significant changes in Project operations, new construction, and/or other large capital expenditures are proposed. The information provided by SCE thus far to RP's and FERC, including the Pre-Application Document (PAD) and DLA, does not indicate that any major operational changes, new construction, or expenditures are proposed by Licensees for the Project at this time. Thus, CDFW recommends FERC issue the shorter 30-year license term to Licensees for the Project.

Information Required Pursuant to 18 CFR §4.51 (a)(5)(i)

CDFW recommends the addition of applicable Game Code (FGC) section to this part of the DLA. CDFW recommends the addition of:

FGC §5937 which states the following: "Sufficient Water for Fish Existing Below Dams – The owner of any dam shall allow sufficient water at all times to pass through a fishway, or in the absence of a fishway, allow sufficient water to pass over, around or through the dam, to keep in good condition any fish that may be planted or exist below the dam. During the minimum flow of water in any river or stream, permission may be granted by the department to the owner of any dam to allow sufficient water to pass through a culvert, waste gate, or over a or around the dam to keep in good condition any fish that may be planted or exist below the dam, when, in the judgment of the department, it is impracticable or determinant to the owner to pass the water though the fishway."

DLA Volume I Exhibit E: Section 3.1.7

Comment: There are seven gages recording streamflow and reservoir stage for Project Operations, including four in stream gages, and three reservoir gages. The DLA states that the United States Geological Survey (USGS) reviews and publishes these records to satisfy the existing FERC license requirements but the frequency at which the data is available is not discussed. As of November 18, 2024, the last update USGS made to these gages was on September 30th, 2023, over a year ago. These gages are required by the 4(e) Conditions 4-6 set by the United States Forest Service (USFS) in the previous license to ensure that streamflow and reservoir level requirements are in compliance. The substantial delay in publicly available data hinders any stakeholders from reviewing compliance with these conditions or providing a timely identification and resolution to any issues. CDFW recommends that SCE work with USGS and the California Department of Water Resources to add daily storage and streamflow information from this project to the California Data Exchange Center and the USGS National Water Information System (NWIS). If there is a concern regarding market manipulation, a time lag from a day to a week could be added to address this issue. This is important for runoff tracking, downstream Los Angeles Department of Water and Power (LADWP) operations, restoration, and monitoring license requirements, as well as public recreation.

DLA Volume II Appendix E.1: Protection, Mitigation, and Enhancement Measures

Comment: Section 1.0 *Environmental Measures and Plans* states that the measures described in this document are proposed as a result of consultation with stakeholders and agencies. The RPs have been having ongoing discussions related to the Project PM&E Measures with SCE but the PM&E measures included in the DLA are carried

over from the previous license and do not include the recommendations made from stakeholders or commitments made by SCE during the ongoing discussions.

Comment: CDFW appreciates the ongoing discussions and SCE's consideration of the concerns raised during the ongoing PM&E meetings. Specifically, CDFW supports modifying PME-1 Minimum Instream Flow Requirements and PME-2 Reservoir Level Requirements for Recreation to allow for a more natural hydrograph with higher spring flows and filling the reservoirs more slowly, while maintaining dam safety. CDFW is also supportive of the continued effort to use the Operations Model to develop realistic minimum instream flows that do not require frequent variance requests.

CDFW also appreciates the ongoing discussions and SCE's consideration of changing the structure of PME-3, Fish Stocking in Ellery Lake, to a set weight/number of fish that SCE is responsible to stock annually, with the location and timing of stocking determined through annual consultation with CDFW.

Comment: Project operations have the potential to affect populations of invasive aquatic algae in Project-affected stream reaches. Didymo (*Didymosphenia geminata)*, an invasive algal species, was historically observed in Project-affected stream reaches (Rost and Fritsen, 2014). The Aquatic Invasive Plants (AQ-4) Study did not observe didymo in any Project-affected stream reaches during 2023, but this was due to an extremely high water year. Given previous observations of didymo in the Project affected reaches, SCE should assume presence. Stakeholders and agencies have expressed concerns during PM&E discussions regarding the spread of didymo and CDFW requests that SCE address this issue in the FLA by drafting a comprehensive aquatic invasive management and monitoring plan, as discussed during the third PM&E Meeting on August 1, 2024.

DLA Volume I Exhibit E: Environmental Report

Impacts on water quality from Hydro-resource Optimization

Comment: Section 6.4.2.3 evaluates the Project's consistency with current resource management objectives set in the Forest Plan and Basin Plan. The DLA evaluates the effects of Hydro-resource Optimization by assessing turbidity data collected as part of the WQ-1 Water Quality TSR, concluding "The observed increases in turbidity did not exceed natural levels and were well below the range of natural variability observed during the 2022 to 2023 monitoring period." In Volume III of the DLA, the final AQ-1 Water Quality TSR acknowledges that turbidity increases were observed coincident with Hydro-resource Optimization and figure 4.3-2 is a graph of data collected between July 17th and 20th, 2022 showing how turbidity increases from a baseline of 0.5 to 4 NTUs at the monitoring site LVC-DSPP2 near the Lee Vining Campground. Appendix D of WQ-1 Hydro-resource Optimization Event Turbidity Data contains the full record of turbidity

data related to Hydro-resource Optimization events. From June through December of 2022, turbidity data shows distinct significant increases in turbidity coincident with Hydro-resource Optimization events, with turbidity values frequently reaching 20 NTU above stable turbidity values of around 1 NTU.

The Basin Plan objective for turbidity states “Waters shall be free of changes in turbidity that cause nuisance or adversely affect the water for beneficial uses. Increases in turbidity shall not exceed natural levels by more than 10 percent” (LRWQCB, 2019). The conclusion made in Section 6.4.3 that “The observed increases in turbidity [related to Hydro-resource Optimization events] did not exceed natural levels and were well below the range of natural variability observed during the 2022 to 2023 monitoring period” should be reassessed and the FLA should disclose the potential adverse effects Hydro-resource Optimization events can have on water quality and aquatic ecosystems as well as address these impacts by developing a PM&E measure to limit the impacts of Hydro-resource Optimization.

Impacts on Stream Fish Populations from Hydro-resource Optimization

Table 6.5-1 Life History Timing of Fish Species Likely to Occur in the Study Area

Comment: The fry/young of the year (YOY) periods displayed in Table 6.5-1 are incorrect. The DLA contradicts this table stating in section 6.5.2.1 that, “reductions in streamflows, like those that occur during Hydro-resource Optimization at Poole Powerhouse, have the potential to strand emergent life stages of naturally reproduced brown and brook trout in lower Lee Vining Creek during spring months (February through May) when their swimming abilities are most limited.” The fry/YOY period should start sometime in December and run through March or April, depending on the species. CDFW requests that the information in this table be reviewed and corrected, as appropriate.

Section 6.5.2.1 Effects of Project Operations on Quantity and Quality of Aquatic Habitat for Fish Populations within Project-Affected Stream Reaches

Comment: The stream reach potentially impacted by Hydro-resource Optimization is Lee Vining Creek between Poole Powerhouse and the pool upstream of the LADWP Diversion Dam (LLVC-F1). The Stream Fish Populations TSR (AQ-2) surveyed this reach in 2022. Fish Captured in this reach included brown trout (*salmo trutta)*, brook trout (*Salvelinus fontinalis*), rainbow trout (*Oncorhynchus mykiss*), and cutbow (*Oncorhynchus clarkii* × *mykiss*). Brown trout were the most abundant and ranged from YOY to the 4+ age class, brook trout ranged from YOY to the 3+ age class, and the two rainbow trout and one cutbow were within 4+ and 5+ age classes based on scale analysis.

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Brown trout and brook trout spawn in the fall and winter, most commonly in November and December (Moyle, 2002). Spawning sites are selected by the female, and site selection occurs once water temperatures drop to 6 to 10°C. Eggs are fertilized and buried in redds and incubate through the winter months (Moyle, 2002). Natural streamflows are low and steady during winter months and disturbance and destruction of the redds can occur is the sediment in the channel becomes mobilized.

As part of the relicensing process, SCE conducted the Lower Lee Vining Creek Channel Morphology TSR (AQ-6) to assess how Project operations have the potential to affect fluvial processes and channel morphology in lower Lee Vining Creek. This study area included Lee Vining Creek downstream of Rhinedollar Dam to the LADWP diversion. This reach is composed of predominately plane bed and pool-riffle morphology with large wood throughout that influence channel morphology and sediment dynamics. Section 6.3.2.2 of the DLA states, “Results from the AQ-6 Study suggest that… the channel bed is relatively mobile, there is no evidence of systematic aggradation or incision, and the channels are not incised, providing connection with the floodplain during floods.”

As part of the relicensing process, SCE also conducted the Aquatic Habitat Mapping and Sediment Characterization TSR (AQ-3) to assess the quality and quantity of spawning gravel in the Project-affected reaches. Table 3.1-2 of the TSR in Volume III of the DLA defined spawning gravel for trout species to include a “sediment size composition between 0.2 and 3.9 inches located in an area with adequate water depth and velocity (i.e., greater than 9.4 inches and 15.7 to 35.8 inches per second, respectively) during flows with a recurrence interval of up to 1.5 years.” The TSR found that spawning gravel in lower Lee Vining Creek decreased in abundance from upstream to downstream, but the quality was lower in the upstream section of the reach, with Figure 4.2-4 classifying the quantity and quality of spawning gravel as “good” to “poor.” The TSR also states that “gravel deposits in lower Lee Vining Creek were primarily semiactive.”

Table 6.4-3 of Volume III of the DLA provides Hydro-resource Optimization event duration, magnitude, and frequency by season, from 2015 to 2023, with the highest frequency occurring during the winter. AQ-3 has demonstrated that the gravels within lower Lee Vining Creek are mobilized during Hydro-resource Optimization events and AQ-3 has also documented that there is suitable spawning gravels within the reach. This evidence suggests that there are potential impacts to spawning brook and brown trout redds from sediment mobilization and scouring of redds during Hydro-resource Optimization events in the winter months. CDFW disagrees with the conclusion in Section 6.5.2.3 that there are no adverse effects on fish and wildlife resources under the Proposed Action and requests that SCE address these impacts by developing a PM&E measure to limit the impacts of Hydro-resource Optimization.

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Comment: Potential impacts to fish populations from Hydro-resource Optimization events were discussed in section 6.5.2.1. of Volume III of the DLA. Part of the Lower Lee Vining Creek Channel Morphology TSR (AQ-6) assessed changes in stage to assess the potential for stranding fish due to rapid changes in flows. Rapid decreases in instream flows have the potential to strand fish and other aquatic life, leading to direct mortality or predation. Areas of a channel that are alternately wet and dry may create habitat that would not support the macroinvertebrate communities important as food for fish. Juvenile fish are especially vulnerable as they often prefer to reside in shallow waters along stream margins. The primary risks from changes in flows from Hydro-resource Optimization are disruption of breeding, scouring, and stranding. Stranding risk is highest when reductions in water surface elevations (stage) are rapid, shoreline slopes and stream gradient are shallow, and topographic depressions create isolated pools and substrate is heavily structured (e.g., cobble and boulder dominated substrate with larger interstitial space). Substrate composition is most structured and poses the greatest stranding risk in the upper section of the reach near Big Bend Campground where gravel, cobble, and boulder substrates dominate, compared to downstream where smaller substrates of sand and gravel are more common.

CDFW disagrees with the conclusions made from the results of AQ-6 in Section 6.5.2 *Potential Adverse Effect and Issues* and believes that these results indicate that Hydro-resource Optimization has the potential to strand fish and other aquatic life. SCE includes in the DLA that “no stranding has ever been documented by SCE or by any of the agencies or other stakeholders in reference material compiled in the pre-application document.” Hydropeaking normally occurs in the evening hours and into the night and thus it would be very unlikely and difficult to document stranding occurring. This statement is misleading and should not be used to justify that the Proposed Action has no adverse effects and CDFW requests that SCE address these impacts by developing a PM&E measure to limit the impacts of Hydro-resource Optimization.

Comment: As discussed during the ongoing PM&E meetings, CDFW would like the FLA to include a PM&E measure that addresses the impacts Hydro-resource Optimization has on the aquatic environment. A rate of 1 inch per hour is generally within the range of natural rates of stage reductions in unregulated rivers (Olson and Metzgar 1987), while Higgins and Bradford (1996) state that maximum recommended stage reduction levels of regulated rivers are typically 2.5–5 cm (1-2 inches) per hour. Recommendations described in Hunter (1992) also suggest reductions in river stage of 1-2 inches per hour are protective of fish populations.

The current license restricts hydropeaking from Poole Powerhouse only by providing high base flows in June and July of 89 cfs versus the required 27 cfs in all other months of the year. CDFW has an interest in understanding how reducing hydropeaking, or slower ramping rates would affect SCE’s power generation at this location. CDFW requests that the intraday Hydro-resource Optimization model SCE developed as part of

the Operations Model TSR (AQ-5) should be used to understand implications for how much ramping rates would have to be adjusted to keep the stream reaches from experiencing less than two inches per hour of stage change. Alternatively, a higher baseflow could be provided during other months (consistent with a natural hydrograph) such that peaking would not cause such drastic stage changes in Lee Vining Creek. During the next PM&E discussions, CDFW would like to consider and understand the impacts of both slower ramping rates and higher minimum instream flows in this reach on SCE's operations through modeling scenarios. The results of these scenarios should be documented in the FLA.

Impacts on Reservoir Fish Populations from Ongoing Project Operations

DLA Volume I, 6.5.2.3. Effects of Project Operations on the Condition of Recreational Fisheries within Project Reservoirs

Comment: The Reservoir Fish Populations TSR (AQ-1) documented the current fish populations within the Project reservoirs. Sampling was conducted through the deployment of gill nets and boat electrofishing. Water quality conditions had little variation between Project reservoirs and were cool with high dissolved oxygen levels throughout the study area. For Ellery Lake the results indicate that it was a small sample size (n=33) and that YOY were present, but Figures 6.5-2 and 6.5-3 in AQ-1 only show three brook trout and no brown trout as YOY, indicating that there is not a strong self-sustaining population of brook or brown trout in Ellery Lake. For Tioga Lake no brown trout were caught, no YOY brook trout were caught, and it was also a small sample size (n=42). Saddlebag also did not have YOY brook trout and only YOY Lahontan redside. The data collected in AQ-1 Reservoir Fish Populations indicates that there are low numbers of brook trout and brown trout in Project Reservoirs, with low recruitment rates. Given that the water quality conditions do not pose a limiting factor of reservoir fish populations, these results indicate that there may a high recreational fishing pressure and that these lakes need to be managed as a put and take fishery. CDFW recommends incorporating these data into the Recreation Use Assessment (REC-1) study to assess if additional stocking efforts are needed and include these results in the FLA.

DLA Volume I, Section 6.6 Terrestrial Wildlife Resources

Comment: The General Wildlife Resources Survey TSR (TERR-2) documented Yosemite toad (*Anaxyrus canorus*) breeding along the southern boundary of Tioga Lake within and adjacent to the FERC Project Boundary. Section 6.6.2.2 *Effects of Dispersed-Use Recreational Activities on Terrestrial Wildlife Resources* acknowledges that "recreational activities that occur within their FERC boundary most commonly coincide with the edge of waterlines (i.e., along the shorelines of Tioga and Saddlebag Lakes). Trampling of small, slow-moving wildlife (such as Sierran tree frog juveniles)

and associated habitat may occur as a result of these activities." CDFW requests that this statement be revised to include potential impacts to the mapped Yosemite toad breeding habitat along Tioga Lake and that SCE consult with the USFS, United States Fish and Wildlife Service (USFWS), and CDFW to minimize Project impacts to Yosemite toad.

DLA Volume II, Appendix A, Wildlife Resources Management Plan (PME-4)

Comment: CDFW supports SCE's plan to continue implementing an Avian Protection Plan (APP), to adhere to a Nesting Bird Management Guide, and to conduct pre-activity nesting bird and raptor surveys. Although CDFW has not reviewed the specifics of these plans, CDFW believes that any buffers for special-status birds should be determined through collaborative discussion between SCE, CDFW, USFS, and USFWS. The General Wildlife Resources Survey (TERR-2) documented bald eagle (*Haliaeetus leucocephalus),* golden eagle (*Aquila chrysaetos*), peregrine falcon (*falco peregrinus*), and olive-sided flycatcher (*Contopus cooperi*) within the Project area. Willow flycatcher (*Empidonax traillii*), although not observed during the survey, also has potential to occur within the Project area. CDFW considers special-status bird species to include species State listed as endangered, threatened, or candidates for these listings; Federally listed as endangered, threatened, or proposed for these listings; State fully protected species; State Species of Special Concern, watch list species; and Forest Service sensitive species.

DLA, Volume II, Appendix E.3: Habitat-Flow Analysis Comments

Comment: This report states that weighted usable area as a function of streamflow over time would be evaluated in this report. However, the resultant habitat time series plots show monthly values, and are presented separated out by water year type. This is an inappropriate way to present a habitat time series analysis as habitat bottlenecks throughout time may be obscured.

CDFW recommends the following changes should be made to this analysis for presentation in the FLA:

- This analysis should not be presented by stacking all wet/normal/dry years together in plots to look like they present time series information. Figures 1-5 in this report present habitat available over time in non-successive similar-grouped water year types. There is no need to split these charts out by water year type, as this obscures seasons in particular water years where habitat bottlenecks may be illustrated and addressed with license conditions.

- Habitat time series should be presented using daily values, not monthly averages. Monthly averages obscure times when low flows would limit habitat available to fish species.
- Habitat time series analyses should not be presented for the reach between Lower Lee Vining Creek between Poole Powerhouse and the LAWDP Diversion Dam (Figures 1-14 through 1-16). This is a peaking reach, and unless intra-daily plots are prepared, presenting these plots based on average daily, or average monthly values severely obscures times when fish habitat is limited at low flows.

DLA Volume III Operations Model (AQ-5) Final Technical Report Comments:

Comment: Although an operations model has been calibrated to meet the stated study plan goal:

> *The intent of the operations model is to measure the ability of the Lee Vining system to meet flow targets that may be beneficial as determined by studies conducted in support of the licensing process.*

The operations model and Hydro-resource Optimization model still do not contain any way to output the results of various scenarios' impact on SCE's power generation, both peaking capability and annual generation. SCE staff and consultants stated in the October 22, 2024 meeting that they intend to continue to discuss alternate instream flow releases in the next few months, but it is unclear what metrics will be used determine impact to power generation in those scenarios based on the most-recently provided operations model version.

Additionally, in response to the State Water Resources Control Board's comments regarding the maximum peak modeled in the Hydro-resource Optimization model, SCE commented that additional flows will be modeled to capture more typical peaks that occur (up to 100 to 110 cfs).

This study and any analysis of measures based on results of this study should be considered incomplete until adequate peaking and power generation impacts are documented in the FLA. Table 2.8-2. (Study Implementation Status for the Project) in the DLA should also be updated to indicate that this study is incomplete until the information discussed above is complete.

DLA Volume I, Section 6.2.6 Scope of Cumulative Effects Analysis

Comment: This section does not provide any Cumulative Effects Analysis and states that, "Cumulative effects will be fully described in the FLA*,"* but Section 8.4. *Finding of No Significant Impact* states that "Continuing to operate and maintain the Project with

the recommended environmental measures (including management and monitoring programs) included under the proposed Action would not be a major federal action significantly affecting the quality of the environment." This Finding of No Significant Impact should not be made without adequately disclosing and analyzing the cumulative effects of the Project.

CONCLUSION

CDFW appreciates the opportunity to comment on the DLA filed by SCE for the relicensing of the Lee Vining Hydroelectric Project. CDFW looks forward to further discussions with the Technical Working Group members.

If you have any questions pertaining to this letter, please contact Graham Meese, Senior Environmental Scientist, at (760) 996-7387 or Graham.Meese@wildlife.ca.gov.

Sincerely,

DocuSigned by:
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MONO LAKE COMMITTEE

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October 31, 2025

Debbie-Anne Reese
Acting Secretary
Federal Energy Regulatory Commission
888 First Street N.E., Room 1A
Washington, D.C. 20426

Submitted electronically: FERC eFiling

RE: Lee Vining Hydroelectric Project, FERC Project No. 1388; Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project

Dear Acting Secretary Reese,

The Mono Lake Committee (MLC) submits the following comments in response to FERC's Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project, dated October 1, 2025, pertaining to the Lee Vining Hydroelectric Project (Project), FERC Project No. 1388.

MLC is a non-profit citizens' group dedicated to protecting and restoring Mono Lake and the Mono Basin ecosystem with a focus on education, science, and cooperative solutions. Supported by 16,000 members, MLC has been active in the Mono Basin since 1978. MLC is an interested party in the Project and appreciates working with Southern California Edison (SCE) and collaborating parties.

As an active participant in the relicensing process, MLC has worked closely with SCE and other interested parties to develop study plans, investigate Protection, Mitigation, and Enhancement (PME) measures, and evaluate the Project's operational implications for stream ecosystem health, sediment dynamics, aquatic habitats, and water quality. Through ongoing discussions, comment letters, technical reviews, and collaborative efforts, MLC has sought to ensure that hydropower operations are balanced with environmental resources.

MLC acknowledges that, throughout the relicensing process, SCE has constructively addressed several of MLC's key priorities, particularly those related to peak flow restoration and public data transparency. MLC appreciates SCE's responsiveness to stakeholder input, including the incorporation of PME-1 (Water Management), as well as SCE's stated commitment in the Final License Application (FLA) consultation log to "work with relicensing participants to

develop a proposed license measure to provide daily reservoir storage and streamflow information (data) from the Project" (Final License Application Volume II, part 1 of 2, page 168). MLC submits the following comments in hopes that they will help guide subsequent data gathering efforts and environmental analysis considerations that remain unresolved.

1. Hydropeaking is a new operational configuration for the Project that has been inadequately analyzed.

Hydropeaking, referred to as "hydro-resource optimization" in the Project, was first introduced on Lee Vining Creek in 2015, year 18 of its current 30-year license. At the May 24, 2021 Aquatic Resources Technical Working Group Meeting, SCE acknowledged that because hydropeaking is a "relatively new [mode of operation], there is a nexus that justifies examining potential impacts of this operation on resources downstream of the Powerhouse (e.g., fish habitat and populations, bird habitat) down to the LADWP diversion" (Preliminary Application Document, Volume II, p95) (LADWP refers to the Los Angeles Department of Water & Power). The discussions borne from the Aquatic Resources Technical Working Group meetings ultimately led in part to the inclusion of the Operations Model (AQ-5) Final Technical Report found in Volume III of the Project FLA. However, no attempt was made in the FLA to relate the flow statistics described in the AQ-5 Final Technical Report to the data collected in the other technical reports, nor was there any attempt to analyze potential cumulative impacts associated with hydropeaking. This lack of analysis was identified by MLC in comments pertaining to the Project Draft License Application (DLA), submitted to FERC on November 25, 2024. **Additional analysis is required to understand specifically what effect hydropeaking has on downstream resources (directly and cumulatively).**

2. Comments submitted by MLC in the DLA remain inadequately addressed in the FLA.

MLC submitted Project DLA comments to FERC on November 25, 2024. A significant portion of those comments sought to 1) connect results from the Final Technical Reports to scientific literature regarding hydropeaking; and 2) identify gaps in analysis. SCE responded to aspects of MLC's DLA comments, but MLC believes that SCE has not adequately addressed the concern that impacts associated with hydropeaking have been inadequately analyzed. Stated in MLC's DLA comments (Final License Application, Volume II, part 1 of 2, page 170):

> *While MLC is appreciative of SCE's continued engagement on the concerns raised by stakeholders pertaining to hydropeaking, the DLA fails to analyze key aspects of SCE's hydro-resource optimization events. In so doing, the DLA fails to adequately analyze the incremental and cumulative impacts of hydropeaking in Lee Vining Creek.*

SCE responded that "potential impacts of Project operations, including hydropeaking, are analyzed in Exhibit E of the FLA" (Final License Application, Volume II, part 1 of 2, page 170). **MLC reasserts that Exhibit E of the FLA does not adequately analyze the impacts of hydropeaking on key environmental resources downstream of Poole Powerhouse.**

To reiterate MLC's primary hydropeaking concerns raised in DLA comments, which persist following the release of the FLA:

A. There is significant uncertainty pertaining to the causal relationship between hydropeaking

and increased turbidity borne from the WQ-1 Final Technical Report.

B. How hydropeaking causally impacts stream fish populations in Lee Vining Creek is unquantified. Inferring any cumulative impact analysis is currently not possible.

C. An integrated analysis is needed to clarify how hydropeaking influences sediment characterization, functional fish habitat availability, and the broader geomorphic processes shaping Lee Vining Creek.

D. The lack of a hydropeaking-specific study undermines the utility of the AQ-5 Operations Model as a tool for guiding adaptive management. While the model provides a useful baseline for understanding operational patterns, the AQ-5 Final Technical Report does not discuss alternative scenarios that could mitigate ecological impacts caused by hydropeaking. Without this analysis, stakeholders are left without a clear understanding of how hydropeaking could be optimized to balance energy generation with ecological resource health.

E. The Final AQ-6 Report does not adequately address the relationship between hydropeaking and channel morphology. Analysis is needed to quantify the effects of hydropeaking on sediment mobility and deposition patterns, distinguishing these from less-variable operations that characterized the Project prior to 2015. How hydropeaking impacts habitat quality and sediment availability during critical ecological periods, particularly for aquatic species dependent on stable substrate conditions, is unanalyzed. More information is needed to understand the cumulative impacts of repeated hydropeaking events on channel morphology and fluvial processes over time and to explore alternative operational scenarios that mitigate hydropeaking's adverse effects while maintaining project objectives.

3. The intermittent and less frequent use of hydropeaking under the current Project license differs significantly from the proposed Project license renewal.

It has been understood during this relicensing process that hydropeaking is a relatively new operational configuration for the Project, but new information reveals that hydropeaking has been an inconsistent operational practice. On August 6, 2025, in response to study requests submitted to FERC, SCE held a "Lee Vining Post-FLA Filing Discussions" meeting with MLC and other interested parties to present findings on its operational capacity to utilize hydropeaking on an annual basis. SCE asserted in its presentation that SCE's "historic use of hydro-resource optimization [is] representative of future potential for optimization", but graphs presented by SCE along with other statements by SCE demonstrate that its use of hydropeaking from 2015 to present is less than what should be expected under the license renewal being proposed (SCE Post-filing meeting materials to address study requests, page 79–80).

As a result of the August 6, 2025 "Lee Vining Post-FLA Filing Discussions" meeting, MLC now understands that SCE operated with little to no hydropeaking from fall 2017 through winter 2020 (**Figure 1**). Therefore, over the last 28 years of its current license, SCE has maximized hydropeaking operations for only 8 of those years and non-consecutively. It is also MLC's understanding that SCE proposes to maximize hydropeaking in the proposed 40-year license renewal, which represents a fundamental difference in how operations have functioned during the current 30-year license.

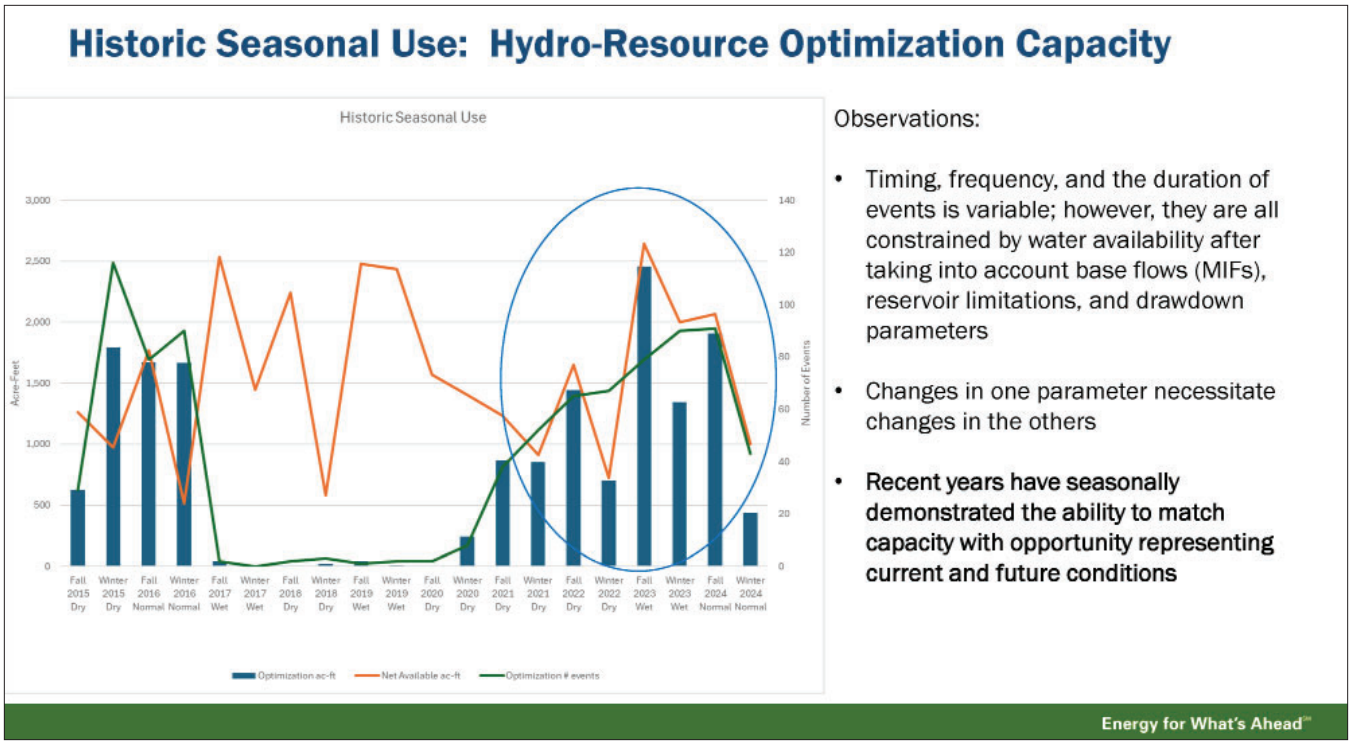

Figure 1 *– Slide #9 of SCE's August 6, 2025 presentation "Lee Vining Post-FLA Filing Discussions." SCE stated that hydropeaking timing, frequency, and duration are constrained by water availability, MIFs, reservoir limitations, and drawdown parameters. However, they also demonstrated a period under the current license when hydropeaking was discretionarily limited independent of those factors, a discretionary choice that SCE does not intend to commit to for the proposed license renewal. The full presentation was submitted by SCE to FERC on August 13, 2025 with the subject "Lee Vining Hydroelectric Project, FERC Project No. 1388; SCE Post-filing meeting materials to address study requests."*

MLC submitted additional study requests to FERC dated March 31, 2025, which included a statement expressing concern about a license that would allow SCE to maximize hydropeaking for 40 sequential years in a manner inconsistent with typical operational practices of the current 30-year license, particularly without additional environmental analysis (SCE Post-filing meeting materials to address study requests, page 22):

> *SCE wants the flexibility to increase the frequency, magnitude, and duration of hydro-resource optimization at Poole Powerhouse under a new license without any regard to water quality, fish populations, habitat conditions, sediment transport, and channel morphology.*

SCE has consistently indicated they expect to be able to maximize hydropeaking operations under the proposed license renewal, which would characteristically differ from operations under the current license in significant and measurable ways. However, SCE also claims that hydropeaking under the proposed license renewal would not differ from the operational practices of the current license. As an example, SCE responded to MLC's March 31, 2025 additional study request in a letter to FERC dated August 13, 2025 (SCE Post-filing meeting materials to address study requests, pages 39–40):

> *SCE intends to operate the Lee Vining Project in a manner similar to how it is currently being managed (...) On average, future hydro-resource optimization event opportunities could not be greater in frequency, magnitude, or duration under proposed flows when compared to historic operations.*

This discrepancy poses challenges to SCE's environmental analysis approach presented in the Final Technical Reports of the Project FLA. Environmental analysis cannot treat the current 30-year license term with only 8 of 28 non-consecutive years of hydropeaking as a metric of similar comparison for the proposed 40-year license renewal, which as currently proposed would allow SCE the flexibility to implement 40 consecutive years of hydropeaking. **How hydropeaking directly and cumulatively impacts downstream resources on both an annual and decadal timescale needs to be explicitly quantified to adequately interpret the long-term implications of unregulated hydropeaking if allowed under a 40-year license renewal.**

4. SCE has failed to analyze a significant reach of Lee Vining Creek affected by its hydropower project, despite public input.

On February 22, 2021, MLC submitted three study requests pertaining to potential resource impacts downstream of Poole Powerhouse. At the time of submitting these study requests, SCE was not planning on studying any resource impacts below Poole Powerhouse.

One of the submitted study requests titled "Hydropower Peaking Operations" had the stated goal of "determine how to limit hydropower peaking operations below thresholds that have significant impacts downstream of the power plant" (Preliminary Application Document, Volume II, p172). MLC is appreciative that SCE was responsive to many aspects of MLC's three study requests, but SCE was not willing to extend any analysis of resource impacts downstream of the LADWP aqueduct point of diversion, stating "SCE is not party to the agreement referenced by the Mono Lake Committee and has not adopted this as a study objective, because there is no Project nexus between SCE operations and settlement parties' ability to meet settlement agreement commitments downstream of the Project" (Preliminary Application Document, Volume II, p285). While SCE is not required to meet flow requirements below the LADWP diversion, this is not the same as playing no role in downstream resource impacts resulting from its hydropower operations.

The Final Technical Reports included in the FLA make no attempt to study or analyze resource impacts for more than three miles of Lee Vining Creek downstream of SCE operations (**Figure 2**). **If SCE operations, particularly hydropeaking operations, have no significant resource impacts to Lee Vining Creek, SCE needs to demonstrate this with quantitative data and analysis, which must necessarily include Lee Vining Creek below the LADWP diversion.**

5. New data suggests that SCE hydropeaking operations do have a direct impact on Lee Vining Creek flows below the LADWP diversion.

Following SCE's August 6, 2025 "Lee Vining Post-FLA Filing Discussions" presentation, MLC requested the tabular 15-minute flow data used by SCE to conduct its hydropeaking capacity analysis. MLC and the other interested parties received the 15-minute flow data on August 22, 2025. MLC made a separate data request for 15-minute flow data from LADWP for gauges related to Lee Vining Creek below Poole Powerhouse, which were received on August 5, 2025. Due to the large amount of data (nearly two million flow values), considerable time was spent by MLC processing the data for easy analysis and comparison between datasets and Runoff Year (April 1–March 31). MLC completed processing these datasets on October 3, 2025.

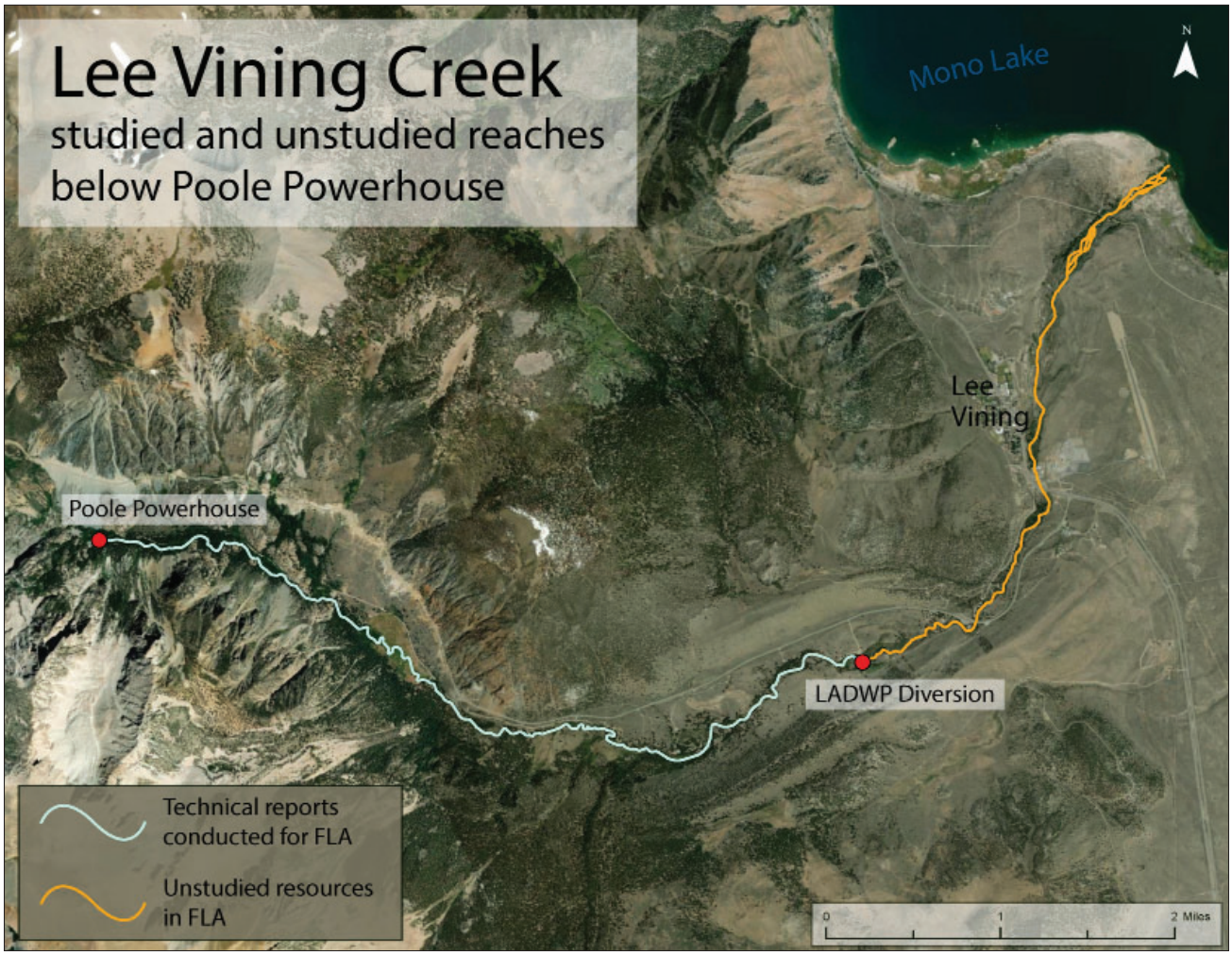

Figure 2 *– Map depicts the sections of Lee Vining Creek that were studied for the FLA (light blue) and the sections of Lee Vining Creek that were not studied for the FLA (orange).*

Results reveal for the first time that SCE's hydropeaking operations have a measurable, discernible, and pronounced effect on Lee Vining Creek flows below the LADWP diversion. Using "number of events" exceeding a 20 cfs flow change within a 1-hour interval as a metric, hydropeaking operations clearly produce flow changes in Lee Vining Creek below the LADWP diversion that have larger magnitudes, are more frequent, and have an altered seasonal timing when compared to periods of operation without hydropeaking (**Figure 3**). Before this analysis was conducted, it was unclear if SCE's operational flow releases could be consistently discerned below the LADWP diversion on Lee Vining Creek, but the newly available data clearly demonstrates that SCE's hydropeaking events result in frequent and unseasonably large magnitude flow changes in Lee Vining Creek below the LADWP diversion.

Attachment 1 included in this comment letter offers additional graphs and data summaries that further characterize how hydropeaking has a discernible and prominent effect on flow patterns below the LADWP diversion. Hydropeaking events appear to be the primary driver for the short-term alteration of flows in Lee Vining Creek below the LADWP diversion.

The Project's FLA lacks resource impact studies downstream of the LADWP diversion. This is a significant analysis oversight given the new information that SCE's hydropeaking operations create large

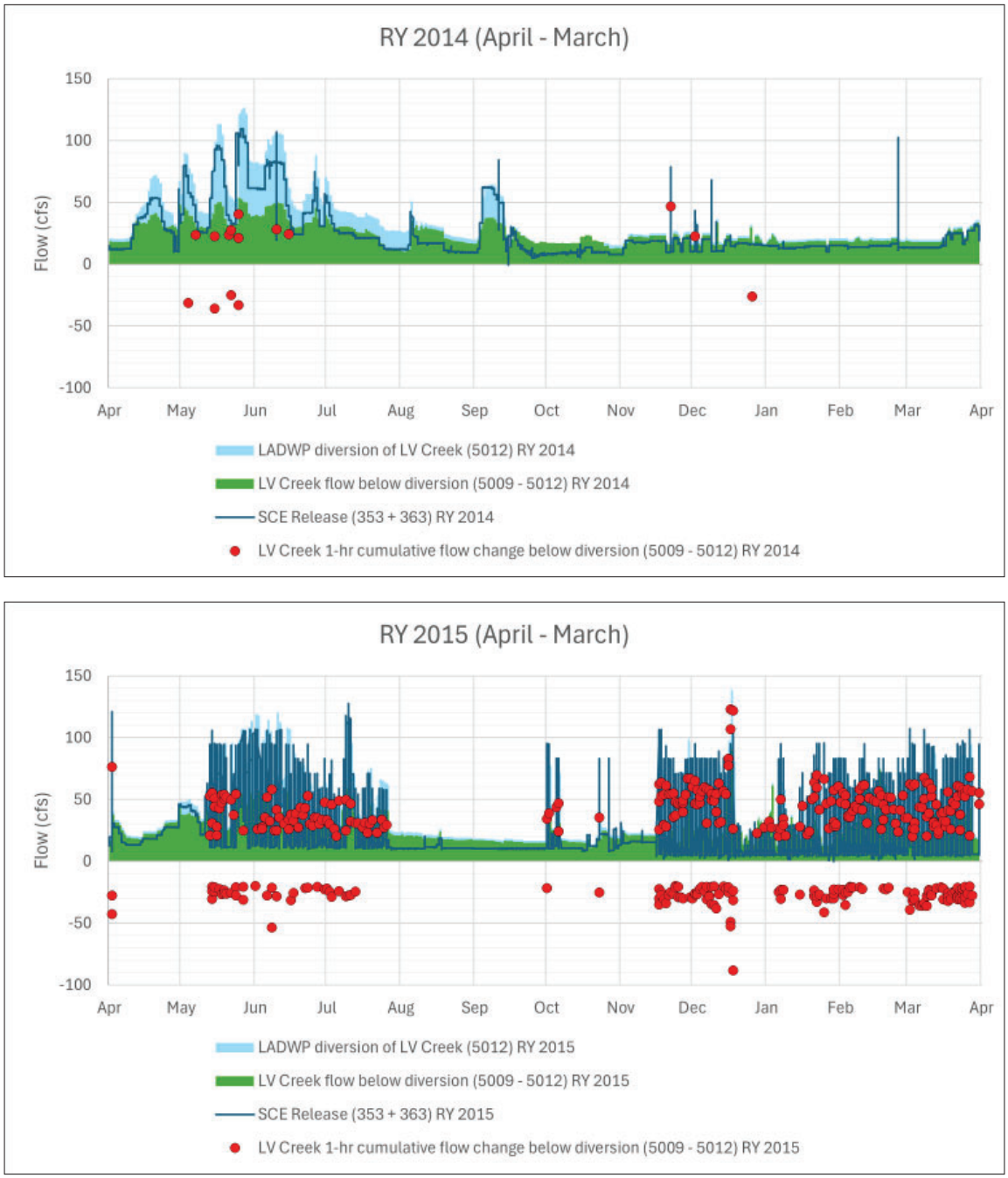

Figure 3 *– Example of Lee Vining Creek hydropeaking analysis conducted by MLC below LADWP's diversion for the 2014 Runoff Year (i.e. April 1, 2014 – March 31, 2015) and 2015 Runoff Year (i.e. April 1, 2015 – March 31, 2016). Hydropeaking on Lee Vining Creek first started in Runoff Year 2015.* ***Green stacked area chart:*** *LV Creek flow below diversion shows the calculated 15-minute flow in Lee Vining Creek below the LADWP diversion. Flow is calculated by taking 15-minute flow values from LADWP's "Lee Vining Creek Above Diversion" (gauge #5009) and subtracting from it 15-minute flow values from LADWP's "Lee Vining Creek Conduit" (gauge #5012) – aka LADWP's stream diversion of Lee Vining Creek.* ***Turquoise stacked area chart:*** *LADWP diversion of LV Creek shows the gauged 15-minute flow for the "Lee Vining Creek Conduit" (gauge #5012) – aka LADWP's stream diversion of Lee Vining Creek. Stacked on top of the calculated 15-minute flow in Lee Vining Creek below the LADWP diversion empirically depicts the gauged 15-minute flow values from LADWP's "Lee Vining Creek Above Diversion" (gauge #5009).* ***Blue line chart:*** *SCE Release shows the calculated 15-minute flow in Lee Vining Creek below SCE's Poole Powerhouse. Flow is calculated by taking 15-minute flow values from SCE's "Rhinedollar Dam Spill flow" (gauge #353) and adding to it 15-minute flow values from SCE's "Poole Powerhouse flow" (gauge #363).* ***Red scatter chart:*** *LV Creek 1-hr cumulative flow change below diversion shows every instance where the cumulative flow change (flow increase or decrease) in Lee Vining Creek below the LADWP diversion over a 1-hour period (on the hour) is greater than 20 cfs. Outside of diurnal fluctuations during peak snowmelt runoff, 20 cfs/hr fluctuations are rare in the absence of hydropeaking. Hydropeaking has a discernible and prominent effect on flow patterns below the LADWP diversion.*

and frequent flow fluctuations in these unstudied reaches. Additional data is needed to evaluate how flow fluctuations produced by SCE's hydropeaking operations are impacting the unstudied reaches of Lee Vining Creek below the LADWP diversion.

6. Additional information is needed to quantify the economic impacts associated with regulating hydropeaking.

SCE filed its Project FLA on January 29, 2025, to which FERC provided an opportunity for interested parties to submit additional study requests. MLC submitted an additional study request dated March 31, 2025, which sought to understand the economic value of hydropeaking as a point of comparison to the environmental impacts associated with hydropeaking operations. MLC had hoped that by quantifying the economic value of hydropeaking for the Project, it would be possible to balance that benefit with resource concerns expressed by interested parties.

As stated in MLC's additional study request (SCE's Response to Comment Letters, page 21):

> *The record shows that in 1997 FERC expected reasonable ramping requirements to be imposed under the current license, however those were not realized. Furthermore, hydro-resource optimization was never analyzed and represents a new operational practice that requires additional consideration beyond what the current license influences. MLC asserts that ramping requirements and hydropeaking thresholds should now be incorporated into the Project in a manner that minimizes both environmental impacts to Lee Vining Creek as well as economic impacts to Project operations. To do this, a study is needed to quantitatively demonstrate economic burden on SCE with regards to regulating hydropeaking and ramping at specific increments. This study would inform how operations could keep both environmental impacts and economic impacts to less than significant levels. Without this study, it will be impossible to adequately consider SCE's economic interests when interested parties make recommendations to FERC on regulating SCE's recent, ongoing, and expanding hydropeaking activities.*

On October 9, 2025, in response to study requests submitted to FERC, SCE held a TWG meeting with MLC and other interested parties that included a presentation titled "Lee Vining Post-FLA Filing Discussions – Hydro-Optimization Part II." The presentation included a few statistics about the economic impacts associated with regulating hydropeaking (**Figure 4**). This effort made by SCE represents a valuable first step in understanding the economic impacts associated with regulating hydropeaking. However, statements by SCE in the presentation that a "25% decrease in value of the Project's economics [is] not sustainable for the Lee Vining Project" should be further qualified and additional regulation scenarios should be analyzed (Lee Vining Post-FLA Filing Discussions – Hydro-Optimization Part II, page 5). **MLC would like to know if there is any percentage decrease in Project value resulting from hydropeaking regulations that SCE would consider sustainable for the Project.**

7. SCE is implementing new communications and remote operations technology that will alter how the project is operated, which requires additional analysis.

The October 9, 2025, "Lee Vining Post-FLA Filing Discussions – Hydro-Optimization Part II" meeting and presentation included information regarding new communications and automated operations

technology coming online to the Project. SCE presented findings that under the new automated system, the Project will be able to more closely match the California Independent System Operator (CAISO) power demand and ramp schedule, which would likely alter in specific ways how the Project operates, particularly with regards to hydropeaking (**Figure 5**).

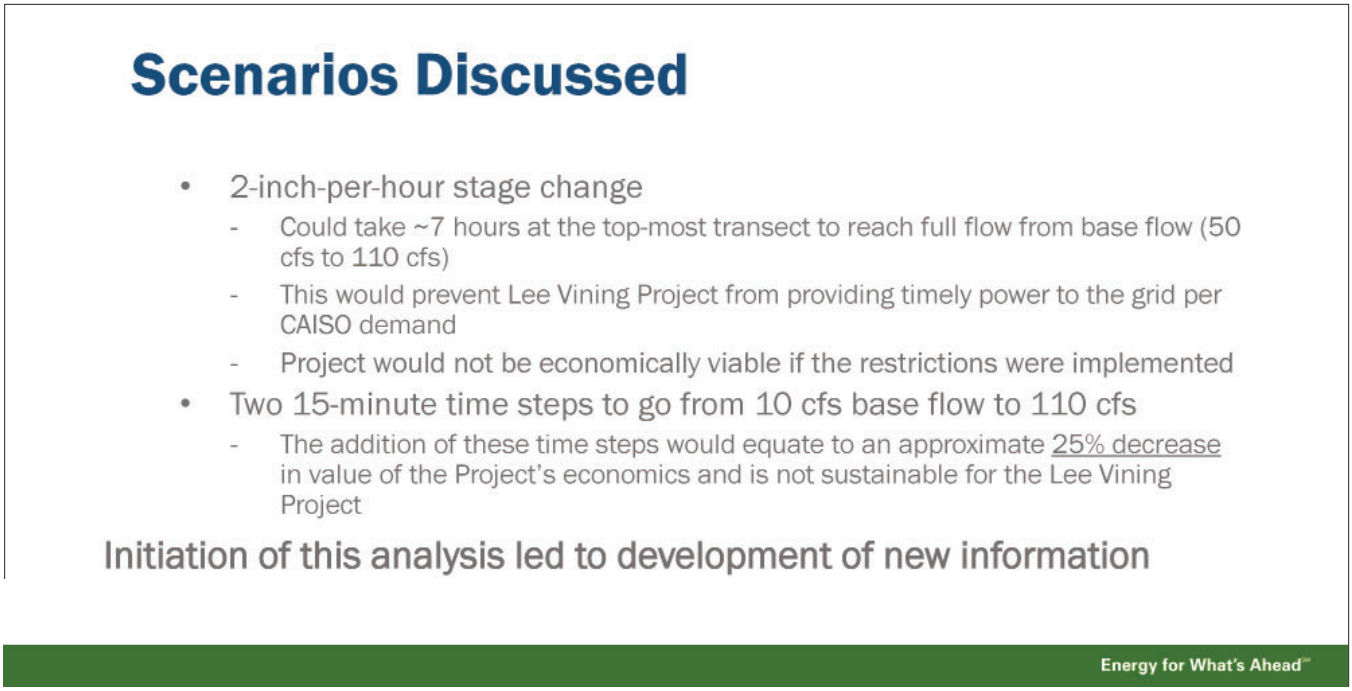

Figure 4 *– Slides #5 and #6 from SCE's "Lee Vining Post-FLA Filing Discussions – Hydro-Optimization Part II" presentation at the October 9, 2025, TWG meeting. MLC received a copy of the presentation on 10/20/2025 via email.*

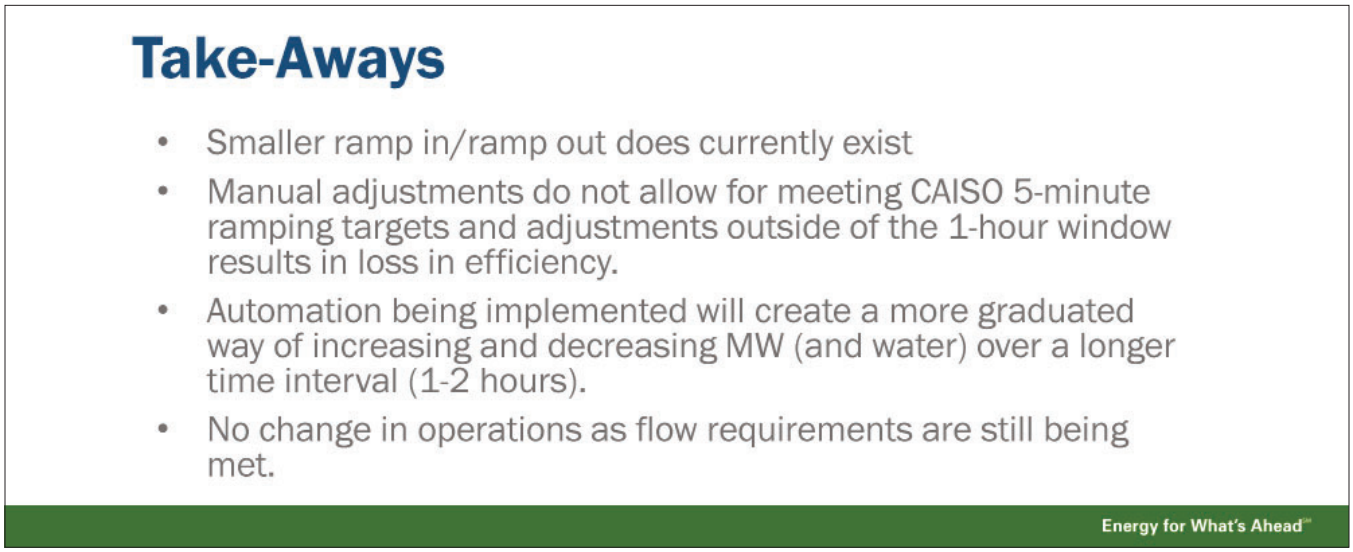

Figure 5 *– Slide #15 from SCE's "Lee Vining Post-FLA Filing Discussions – Hydro-Optimization Part II" presentation at the October 9, 2025, TWG meeting.*

SCE identified that the Project's new ability to more closely match CAISO requests "will create a more graduated way of increasing and decreasing [megawatts] (and water) over a longer time interval" (Lee Vining Post-FLA Filing Discussions – Hydro-Optimization Part II, page 15). MLC appreciates the potential to improve economic value of the Project while simultaneously minimizing the rate at which flow changes occur in Lee Vining Creek below Poole Powerhouse. MLC and others expressed uncertainty as to whether the CAISO power demand and ramp schedule would remain beneficial to downstream resources in the future. MLC appreciates that in a subsequent meeting on October 23, 2025, SCE described willingness to adopt a PME measure that would act as a ramping rate "backstop" should CAISO power demand and ramp schedule become less graduated in the future. MLC is interested in and looks forward to continuing conversations with SCE and the other interested parties about this concept.

MLC also notes that the economic value of the new operations technology has not yet been quantified. However, increased profitability from remote operational control could make compliance with hydropeaking regulations less cost-prohibitive, fundamentally changing the calculus of the Project's long-term economic sustainability. **MLC recommends quantifying the benefit of the new technology improvements in relation to the Project's current operations.**

8. Hydropeaking has variable seasonal impacts on the downstream fishery and special mitigation considerations are necessary.

The 2010 Mono Basin Stream Restoration and Monitoring Program Final Report determined that artificially elevated fall and winter baseflows in Lee Vining Creek impair winter holding habitat for trout, limited adult trout survival, and that trout populations in Lee Vining Creek can be flow-limited by hydrograph timing relative to sensitive life stages. Specifically, the report states that "winter baseflows are artificially high and as a result, diminish adult trout holding habitat quantity and quality. The Order 98-05 fall and winter baseflows generate unfavorably high velocities that consequently impair winter holding habitat availability for adult brown trout and rainbow trout" (Mono Basin Stream Restoration and Monitoring Program Final Report, page 73). Further, peak emergence for brown trout "frequently occurred during, or soon after, the peak snowmelt period… which may explain why annual fish sampling

documented variable, and sometimes very low, recruitment of age-0 brown trout" in Lee Vining Creek (Mono Basin Stream Restoration and Monitoring Program Final Report, page 82). The State Water Resources Control Board acknowledged these concerns by revising flow management in Lee Vining Creek with Order 21-86.

Together, these findings help demonstrate that high flow magnitudes during both the winter holding period and the spawning/incubation period constrain trout population performance by disrupting essential habitat functions when these life stages are most vulnerable. SCE's hydropeaking is overriding those benefits and reintroducing the concerning damage at these times. **A causal analysis is needed to determine how the seasonal timing of hydropeaking affects trout during sensitive life stages.**

Conclusion

MLC maintains that the FLA does not sufficiently evaluate the direct and cumulative environmental impacts associated with hydropeaking. Although hydropeaking has been presented as a relatively recent operational configuration, new information indicates that its implementation has been inconsistent, complicating the understanding of its long-term effects. To support informed decision-making in the context of a 40-year license renewal, it is necessary to explicitly quantify how hydropeaking influences downstream hydrology and biological resources on both annual and decadal timescales. If SCE maintains that these operations do not result in resource impacts, this conclusion must be supported through robust, quantitative analysis that includes the currently unstudied reaches below the LADWP diversion. Causal analysis is essential to determine how the timing of hydropeaking interacts with sensitive trout life stages and seasonal habitat needs. MLC requests that SCE evaluate the economic sustainability of implementing hydropeaking regulations considering modernized operational technologies, including identifying the extent to which a reduction in Project value would remain acceptable. Addressing these analytical gaps is necessary to ensure that resource protections, operational feasibility, and long-term stewardship responsibilities are appropriately balanced in the renewed license. Thank you for this opportunity to provide scoping comments.

Sincerely,

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Restoration Field Technician

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Kleinschmidt Group

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REFERENCES:

Southern California Edison (October 9, 2025). Lee Vining Post-FLA Filing Discussions – Hydro-Optimization Part II, TWG Meeting October 9, 2025. *Email correspondence received by MLC from SCE on 10/20/2025.*

Southern California Edison (August 13, 2025). Lee Vining Hydroelectric Project, FERC Project No. 1388; SCE Post-filing meeting materials to address study requests. *Federal Energy Regulatory Commission.*

Southern California Edison (July 23, 2025). Lee Vining Hydroelectric Project, FERC Project No. 1388; SCE's Response to Comment Letters. *Federal Energy Regulatory Commission.*

Southern California Edison (January 29, 2025). Lee Vining Hydroelectric Project (FERC Project No. 1388) Final License Application, Volume I. *Federal Energy Regulatory Commission.*

Southern California Edison (January 29, 2025). Lee Vining Hydroelectric Project (FERC Project No. 1388) Final License Application, Volume II, Part 1 of 2. *Federal Energy Regulatory Commission.*

Southern California Edison (August 12, 2021). Lee Vining Project (FERC Project No. 1388) Preliminary Application Document, Volume II. *Federal Energy Regulatory Commission.*

McBain & Trush, Inc. and Ross Taylor Associates (April 30, 2010). Mono Basin Stream Restoration and Monitoring Program: Synthesis of Instream Flow Recommendations to the State Water Resources Control Board and the Los Angeles Department of Water and Power, Final Report. *California State Water Resources Control Board.*

Attachment 1

Lee Vining Hydroelectric Project hydropeaking analysis conducted by MLC for Lee Vining Creek flows below LADWP's diversion. Hydropeaking operations for the Lee Vining Hydroelectric Project first started in May of Runoff Year 2015.

Analysis conducted from the following two datasets:

1. On August 22, 2025, Carissa Shoemaker, Licensing Coordinator for Kleinschmidt on behalf of Southern California Edison (SCE) emailed an Excel workbook with 15-minute hydrology data used internally to evaluate hydropeaking events for the Lee Vining Hydroelectric Project (FERC Project No. 1388). Flow data provided ranged from October 1, 2009 12:00 am through July 1, 2025, 12:00 am and contained flow data (as cubic feet per second) for:
    a. Poole Power House (gauge #363); and
    b. Spill from Rhinedollar Dam (gauge #353)

2. On August 5, 2025, Chad Lamacchia, Aqueduct Operations for the Los Angeles Department of Water and Power (LADWP) emailed an Excel workbook with 15-minute hydrology data for Lee Vining Creek and related LADWP facilities. Flow data provided ranged from May 1, 2013 11:30 am through July 2, 2025, 2:15 pm and contained flow data (as cubic feet per second) for:
    a. Lee Vining Creek above diversion (gauge #5008); and
    b. Lee Vining Creek Conduit (gauge #5012)

Runoff Year (April 1 – March 31)	**Hydropeaking occurring?**
2013	No
2014	No
2015	Yes
2016	Yes
2017	No *
2018	No
2019	No
2020	No *
2021	Yes
2022	Yes
2023	Yes
2024	Yes
2025	Yes

*While Runoff Years 2017 and 2020 were mostly characteristic of an operational configuration that lacks hydropeaking, both Runoff Years had a small period of hydropeaking lasting less than a month, approximately April 1 through April 20, 2017 and February 13 through February 18, 2023, respectively.

Number of occurrences where a flow increase exceeded 20 cfs within 1-hour, organized by Runoff Year and month:

Runoff Year and Month	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
April		0	1	40	36	14	1	0	14	25	2	0	39
May	4	6	18	18	1	4	1	2	25	0	8	53	51
June	3	2	29	2	7	2	2	0	22	23	2	27	45
July	0	0	21	19	0	0	6	0	5	28	1	55	
August	0	0	0	35	0	0	1	0	0	19	4	19	
September	0	0	0	0	2	0	0	0	10	26	43	35	
October	0	0	6	41	0	0	0	0	5	16	25	15	
November	1	1	24	45	0	0	0	0	20	17	41	17	
December	0	1	31	29	0	0	0	0	0	10	39	14	
January	0	0	29	41	0	1	0	0	19	8	39	14	
February	0	0	34	33	0	1	0	7	12	0	34	5	
March	1	0	52	43	0	0	0	0	0	0	8	9	
Total	9	10	245	346	46	22	11	9	132	172	246	263	135

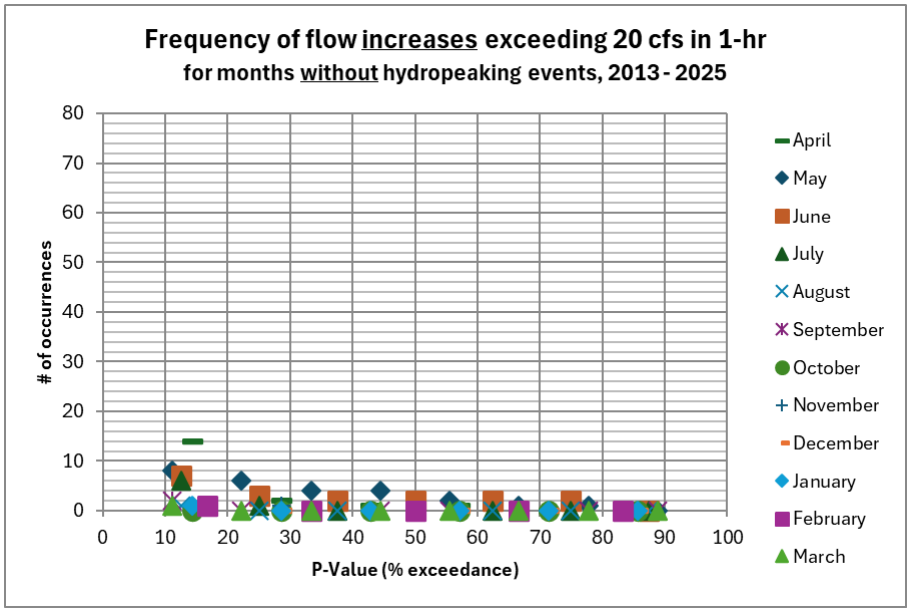
Number of occurrences where a flow decrease exceeded 20 cfs within 1-hour, organized by Runoff Year and month:

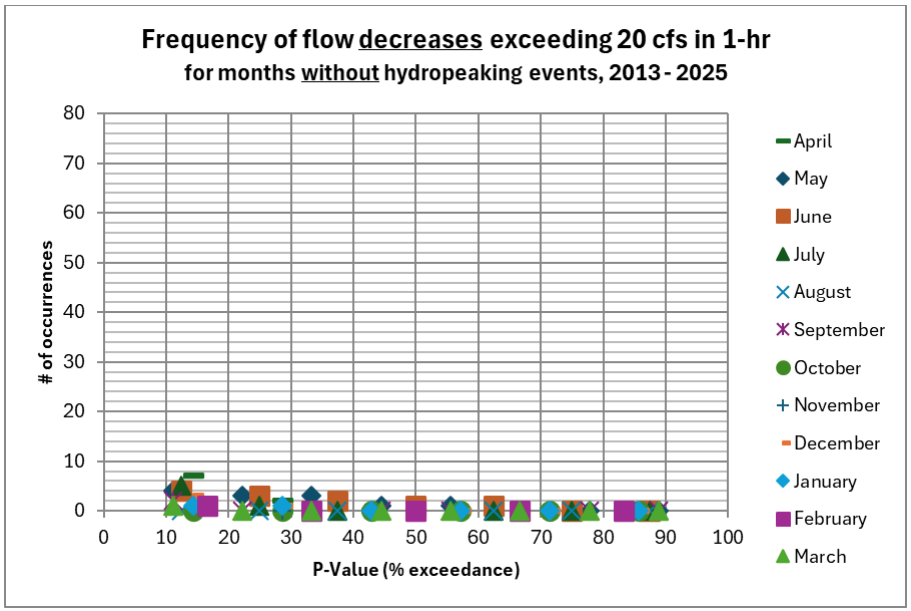
Runoff Year and Month	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025
April		0	2	28	23	7	0	0	10	20	0	0	44
May	3	4	15	13	0	3	0	1	15	0	1	63	56
June	4	0	11	3	2	1	3	0	18	14	1	29	42
July	0	0	8	1	1	0	5	0	2	22	0	70	
August	0	0	0	7	0	0	0	0	0	8	8	17	
September	0	0	0	0	2	0	0	0	14	35	65	33	
October	0	0	2	32	0	0	0	0	2	11	26	23	
November	1	0	17	44	0	0	0	0	5	9	25	19	
December	0	1	26	15	0	0	3	0	1	5	29	15	
January	0	0	18	34	0	0	1	1	14	1	15	17	
February	0	0	13	11	0	1	0	9	16	1	12	6	
March	1	0	48	5	0	0	0	0	0	0	2	10	
Total	9	5	160	193	28	12	12	11	97	126	184	302	142

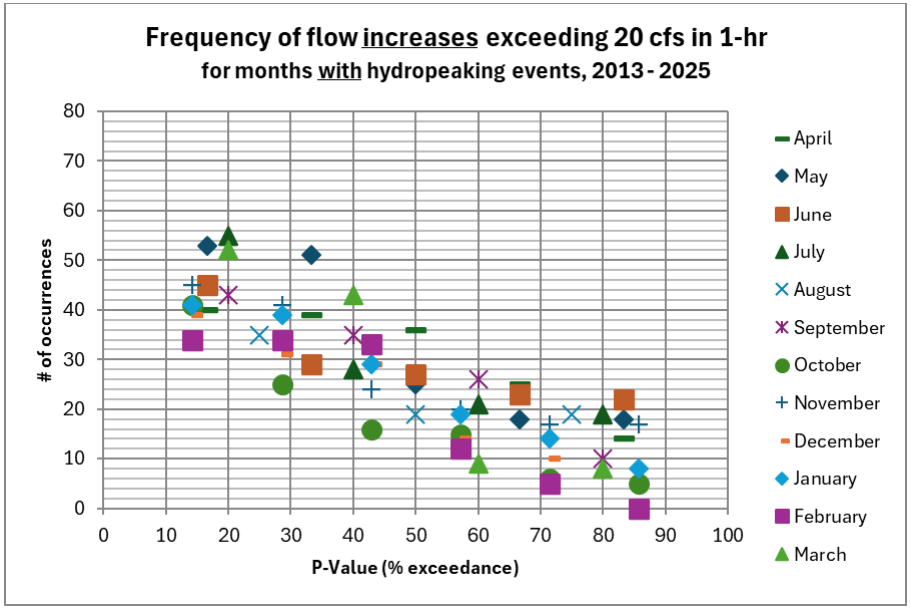
Legend:

No Data
Month without hydro-resource optimization
Month with hydro-resource optimization
Month with uncertain hydro-resource optimization (not included in analysis)

Figure 6 *– Tabular data used to produce exceedance charts depicted in* ***Figure 7****. Evaluating whether months exhibited hydropeaking was done through visual evaluation of 15-minute flow data provided by SCE and summarized in subsequent graphs included in this* ***Attachment 1****.*







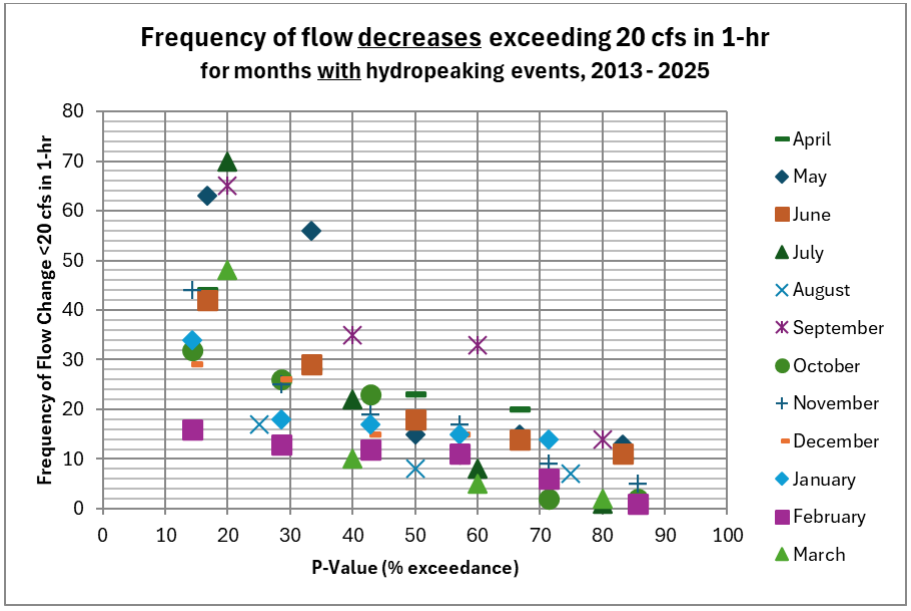


Figure 7 *– Monthly exceedance graphs for flow increases greater than 20 cfs in 1-hr (left) and flow decreases greater than 20 cfs in 1-hr (right) in Lee Vining Creek below LADWP's diversion from May 2013 through June 2025, separated by months without hydropeaking (top) and months with hydropeaking (bottom). For months with hydropeaking, the median (50% exceedance) number of 1-hour flow changes exceeding 20 cfs was greater than the maximum number observed in months without optimization.*

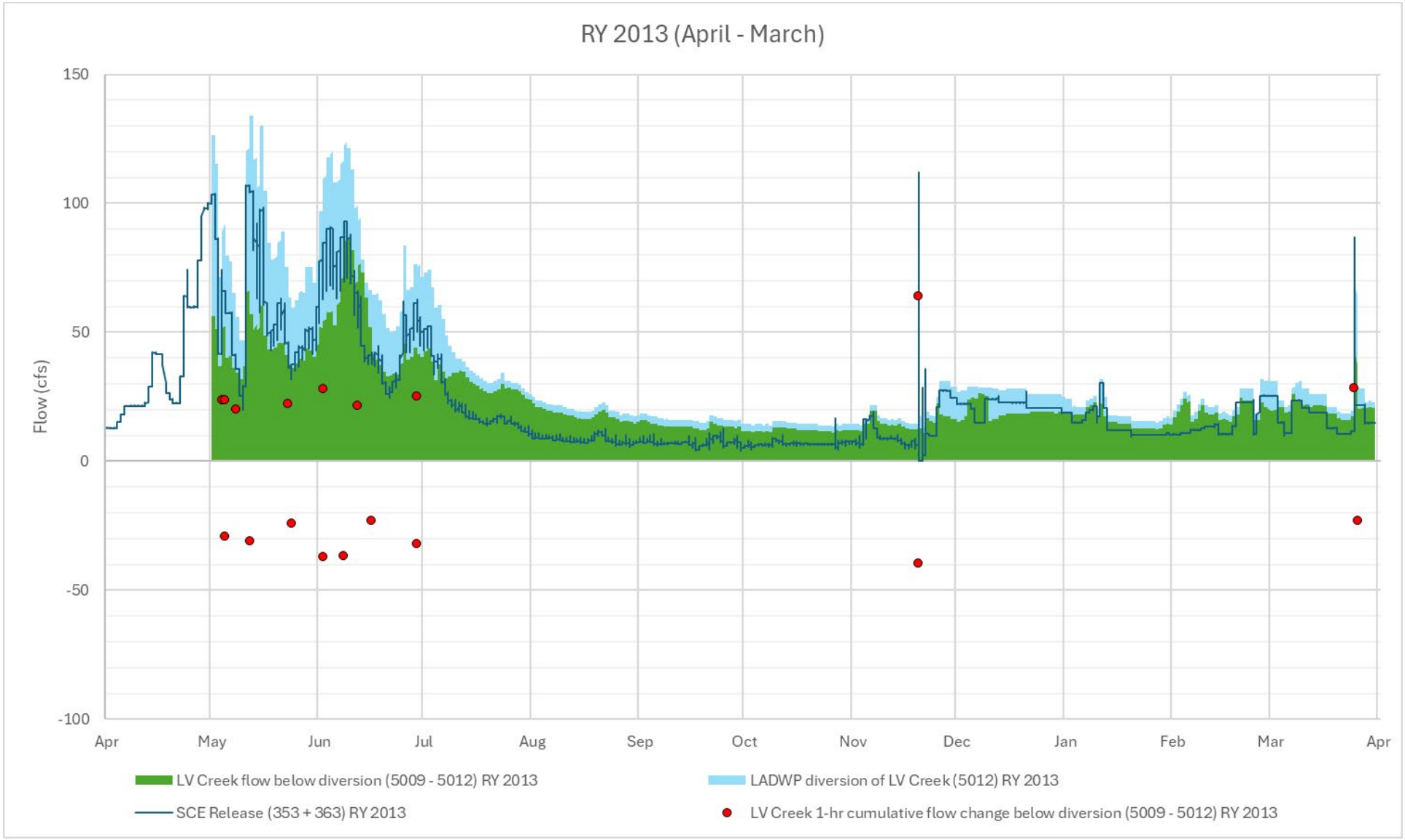
Legend for subsequent graphs:

Green stacked area chart: LV Creek flow below diversion (5009 – 5012) shows the calculated 15-minute flow in Lee Vining Creek below the LADWP diversion. Flow is calculated by taking 15-minute flow values from LADWP's "Lee Vining Creek Above Diversion" (gauge #5009) and subtracting from it 15-minute flow values from LADWP's "Lee Vining Creek Conduit" (gauge #5012) – aka LADWP's stream diversion of Lee Vining Creek.

Turquoise stacked area chart: LADWP diversion of LV Creek (5012) shows the gauged 15-minute flow for the "Lee Vining Creek Conduit" (gauge #5012) – aka LADWP's stream diversion of Lee Vining Creek. Stacked on top of the calculated 15-minute flow in Lee Vining Creek below the LADWP diversion results in the gauged 15-minute flow values from LADWP's "Lee Vining Creek Above Diversion" (gauge #5009).

Blue line chart: SCE Release (353 + 363) shows the calculated 15-minute flow in Lee Vining Creek below SCE's Poole Powerhouse. Flow is calculated by taking 15-minute flow values from SCE's "Rhinedollar Dam Spill flow" (gauge #353) and adding to it 15-minute flow values from SCE's "Poole Powerhouse flow" (gauge #363).

Red scatter chart: LV Creek 1-hr cumulative flow change below diversion (5009 – 5012) shows every instance where the cumulative flow change (flow increase or decrease) in Lee Vining Creek below the LADWP diversion over a 1-hour period (on the hour) is greater than 20 cfs.


RY 2013 (April - March)
150
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-100
Flow (cfs)
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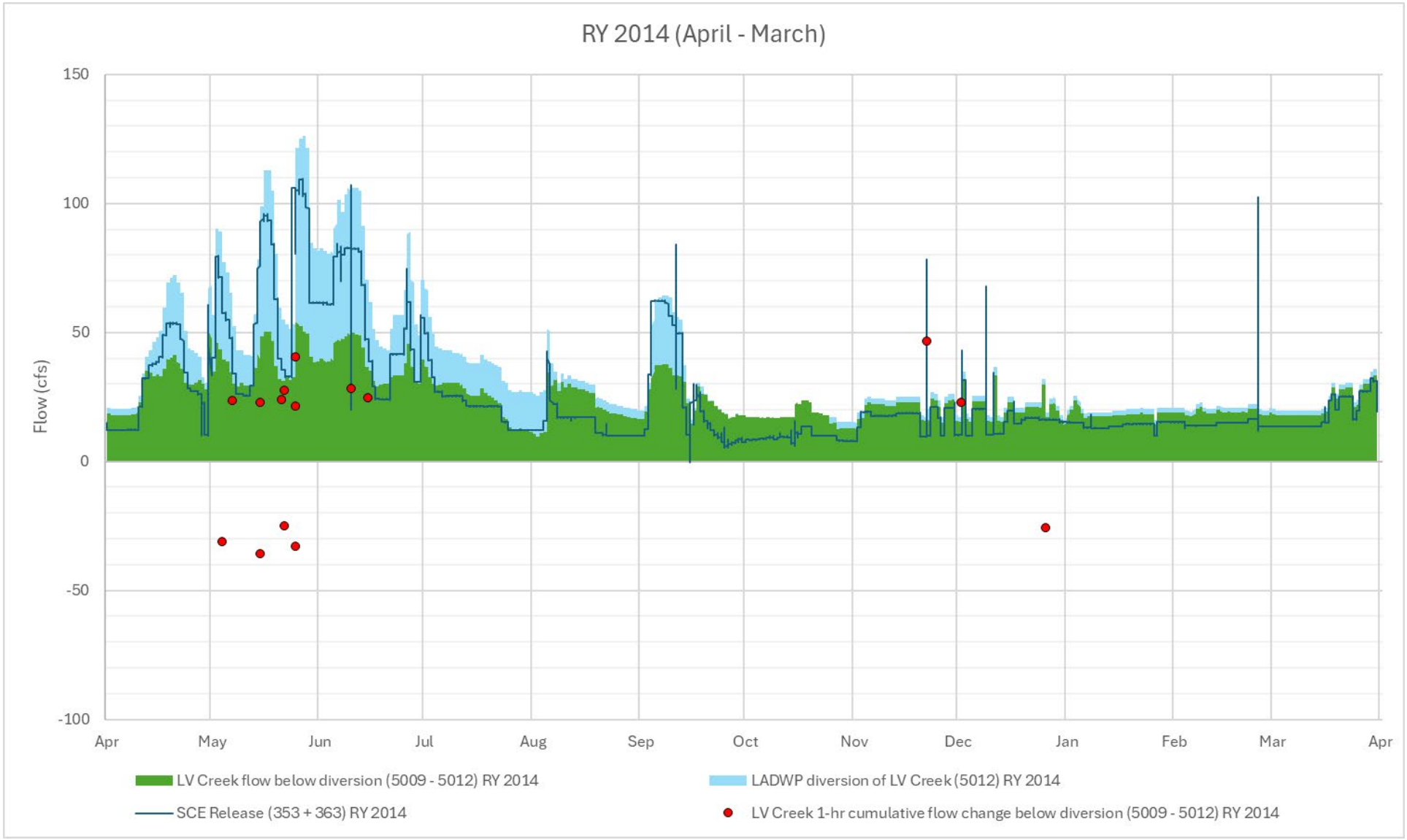
LV Creek flow below diversion (5009 - 5012) RY 2013
LADWP diversion of LV Creek (5012) RY 2013
SCE Release (353 + 363) RY 2013
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2013


RY 2014 (April - March)
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Flow (cfs)
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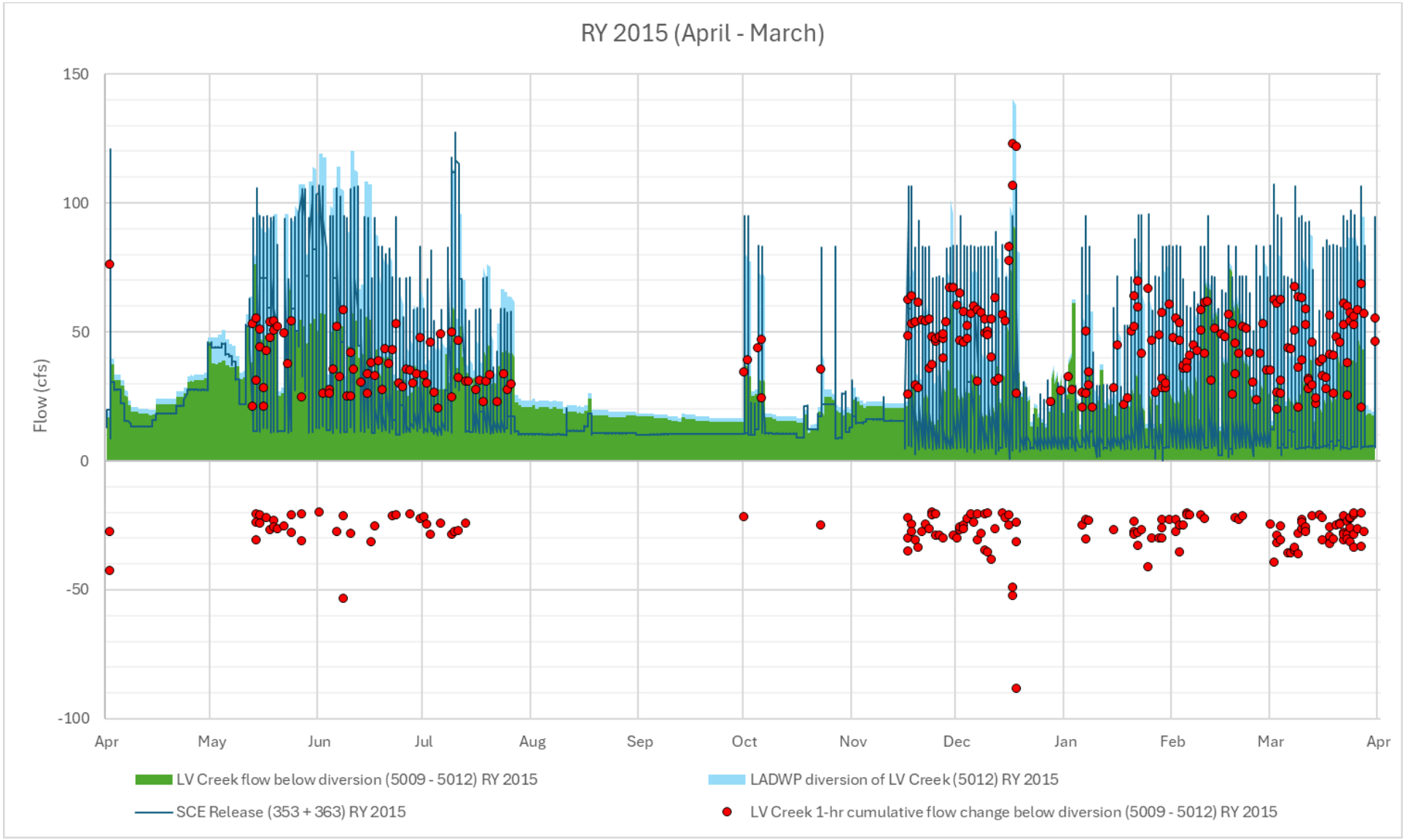
LV Creek flow below diversion (5009 - 5012) RY 2014
LADWP diversion of LV Creek (5012) RY 2014
SCE Release (353 + 363) RY 2014
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2014


RY 2015 (April - March)
Flow (cfs)
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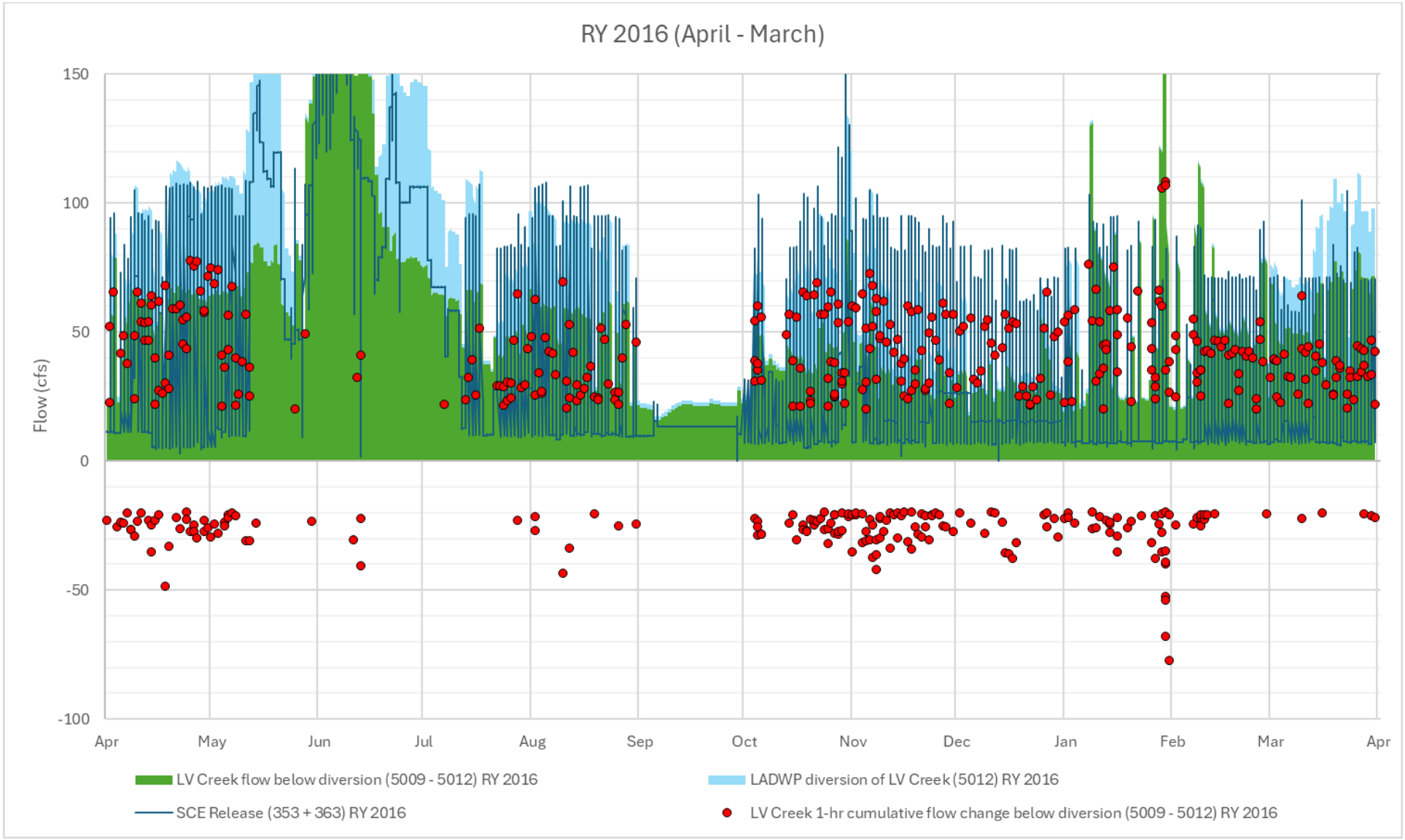
LV Creek flow below diversion (5009 - 5012) RY 2015
LADWP diversion of LV Creek (5012) RY 2015
SCE Release (353 + 363) RY 2015
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2015


RY 2016 (April - March)
Flow (cfs)
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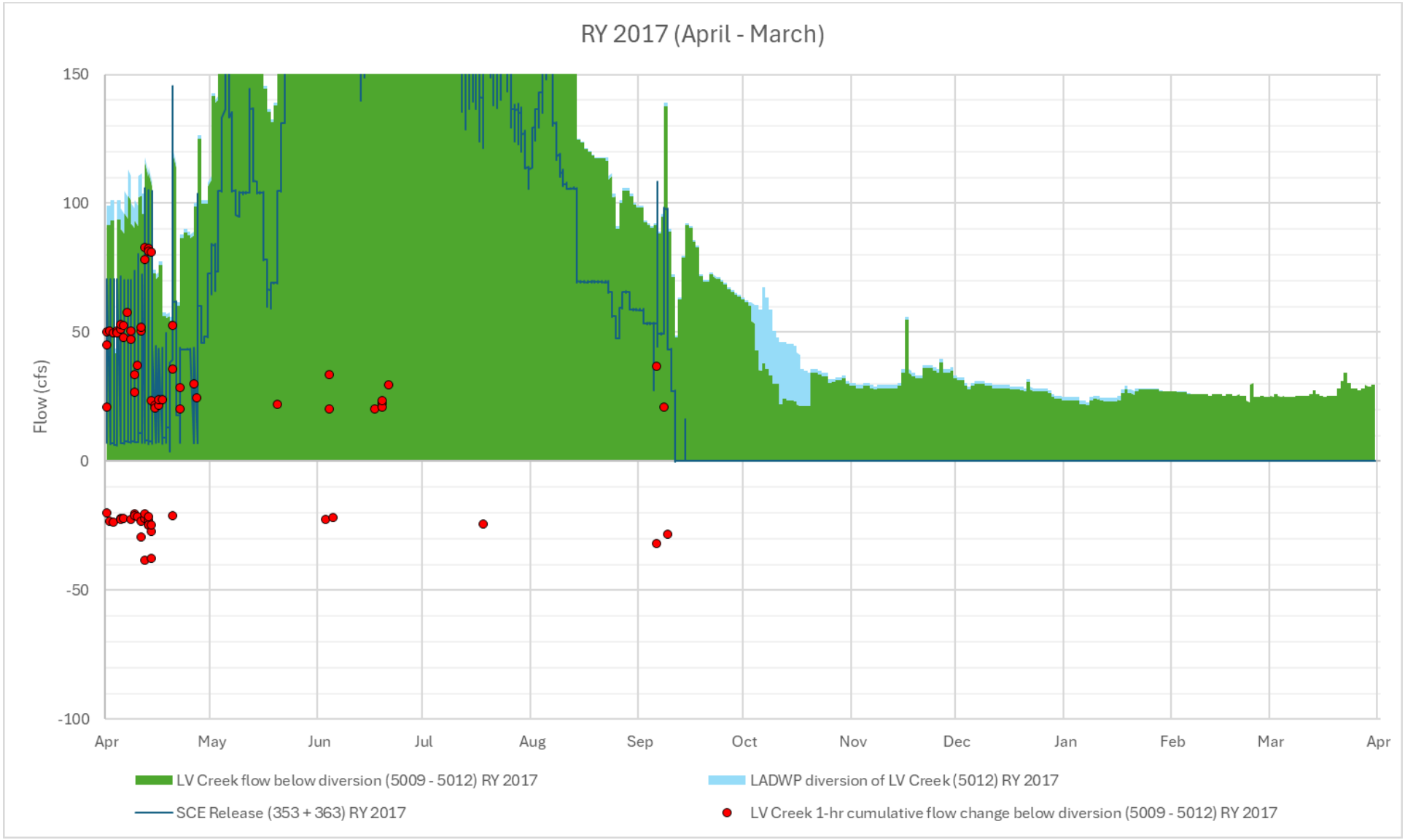
LV Creek flow below diversion (5009 - 5012) RY 2016
LADWP diversion of LV Creek (5012) RY 2016
SCE Release (353 + 363) RY 2016
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2016


RY 2017 (April - March)
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Flow (cfs)
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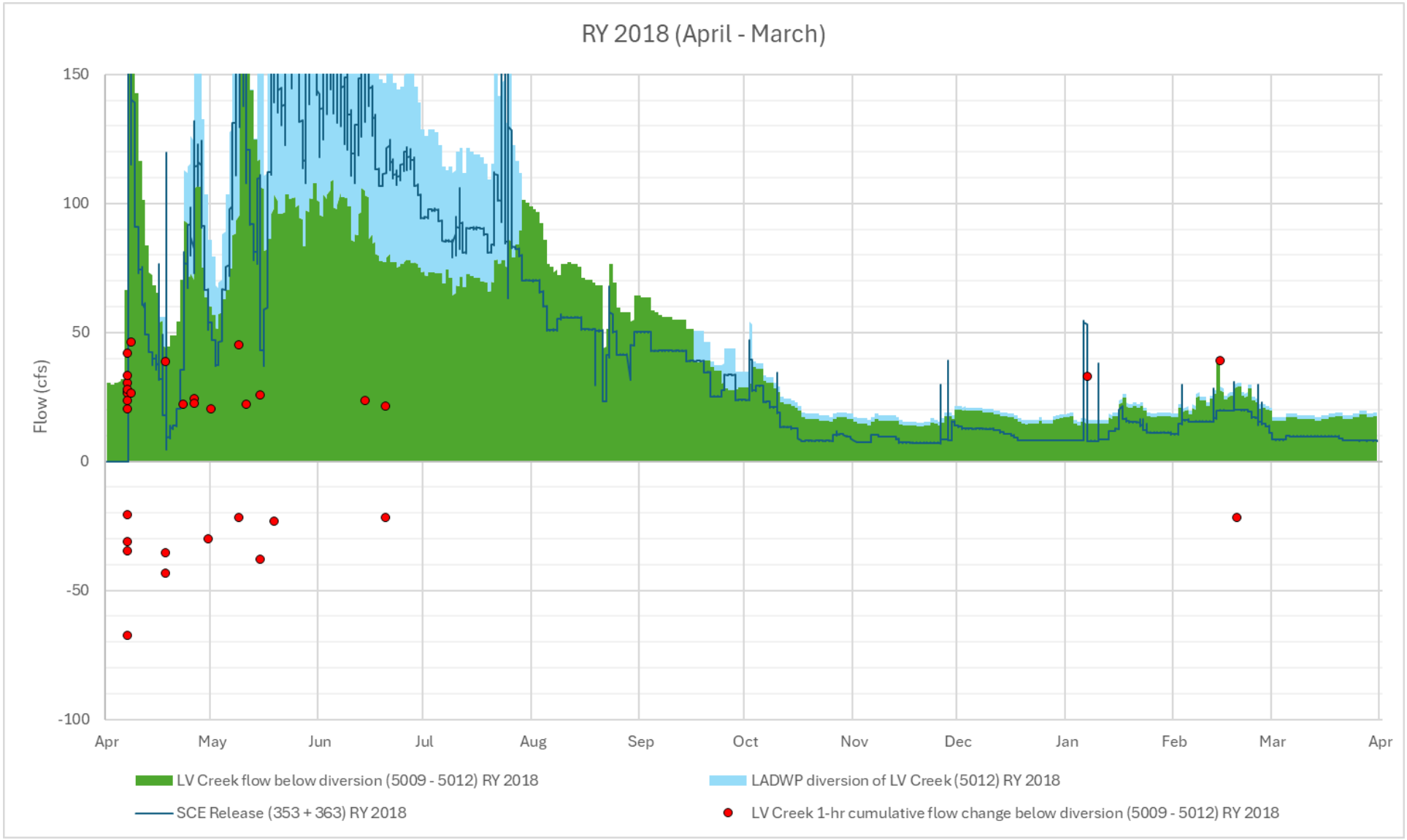
LV Creek flow below diversion (5009 - 5012) RY 2017
LADWP diversion of LV Creek (5012) RY 2017
SCE Release (353 + 363) RY 2017
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2017


RY 2018 (April - March)
Flow (cfs)
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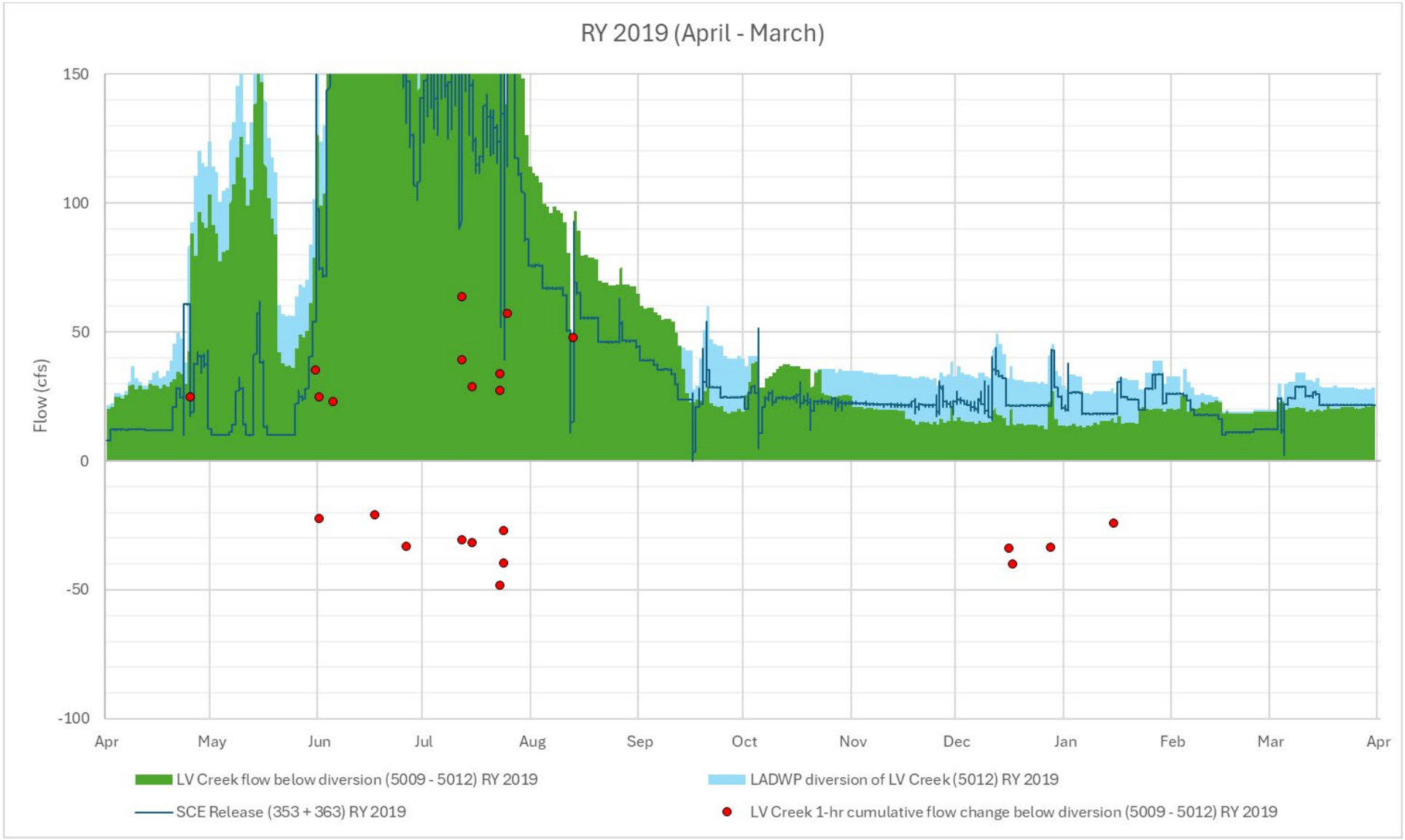
LV Creek flow below diversion (5009 - 5012) RY 2018
LADWP diversion of LV Creek (5012) RY 2018
SCE Release (353 + 363) RY 2018
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2018


RY 2019 (April - March)
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Flow (cfs)
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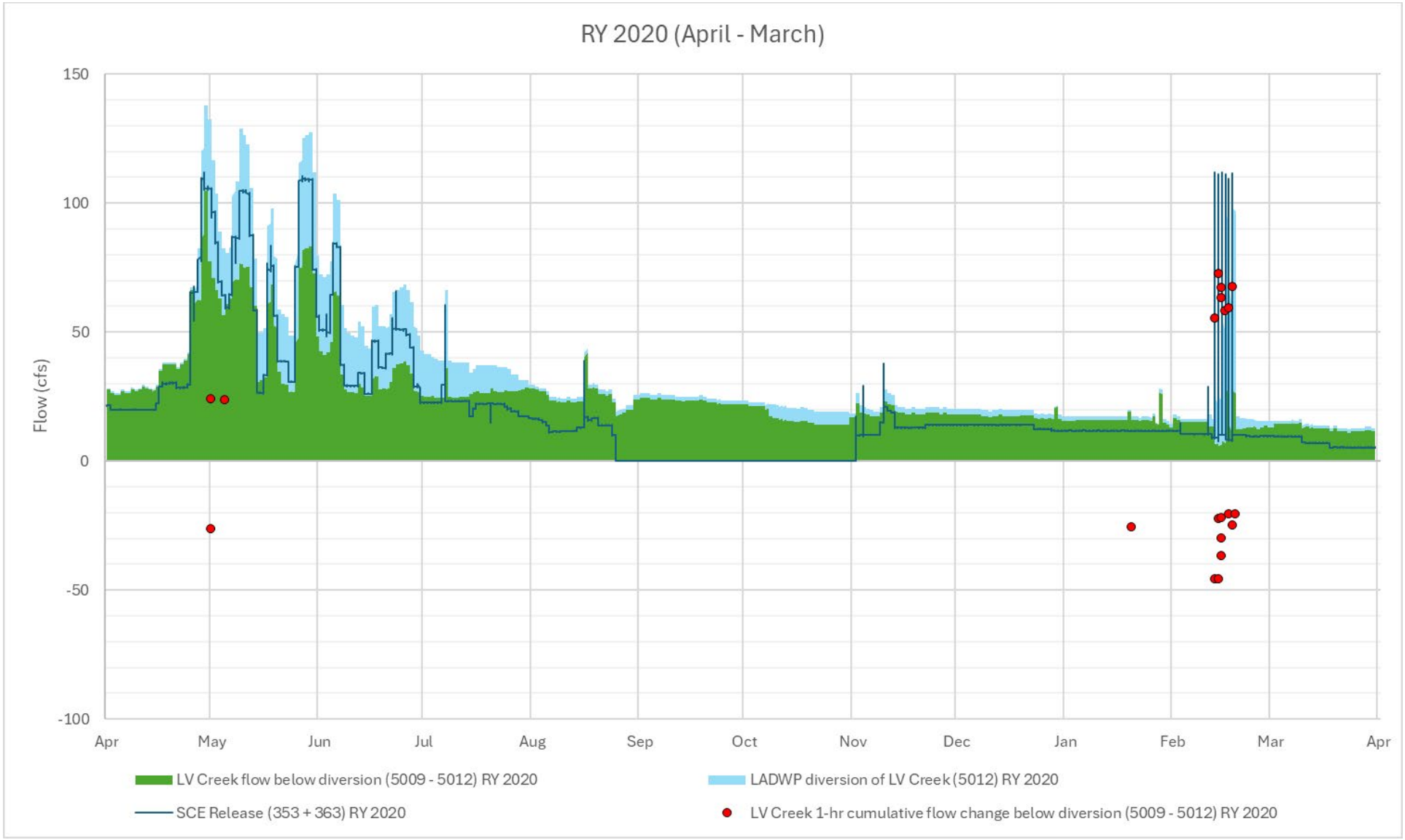
LV Creek flow below diversion (5009 - 5012) RY 2019
LADWP diversion of LV Creek (5012) RY 2019
SCE Release (353 + 363) RY 2019
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2019


RY 2020 (April - March)
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Flow (cfs)
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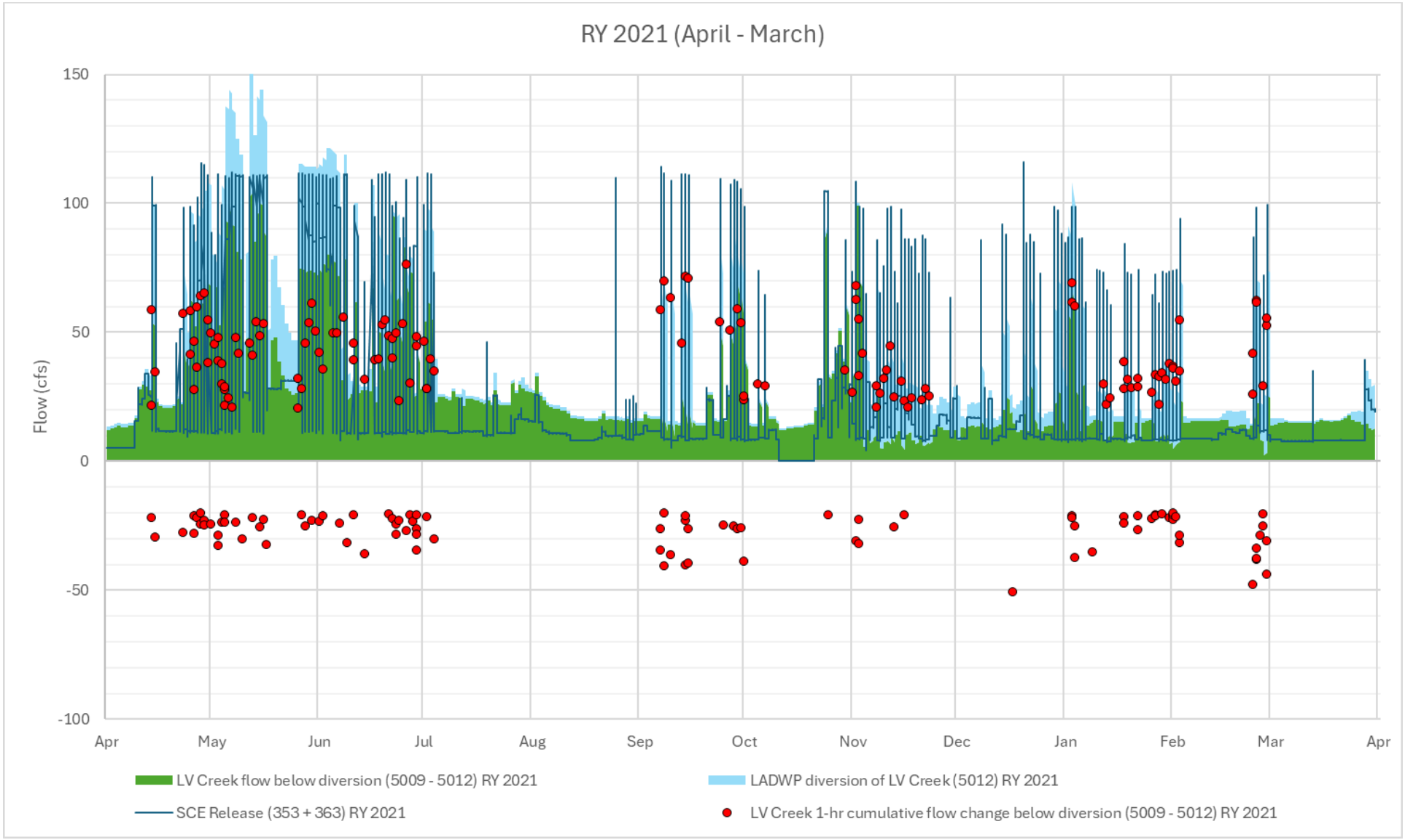
LV Creek flow below diversion (5009 - 5012) RY 2020
LADWP diversion of LV Creek (5012) RY 2020
SCE Release (353 + 363) RY 2020
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2020


RY 2021 (April - March)
Flow (cfs)
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LV Creek flow below diversion (5009 - 5012) RY 2021
LADWP diversion of LV Creek (5012) RY 2021
SCE Release (353 + 363) RY 2021
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2021

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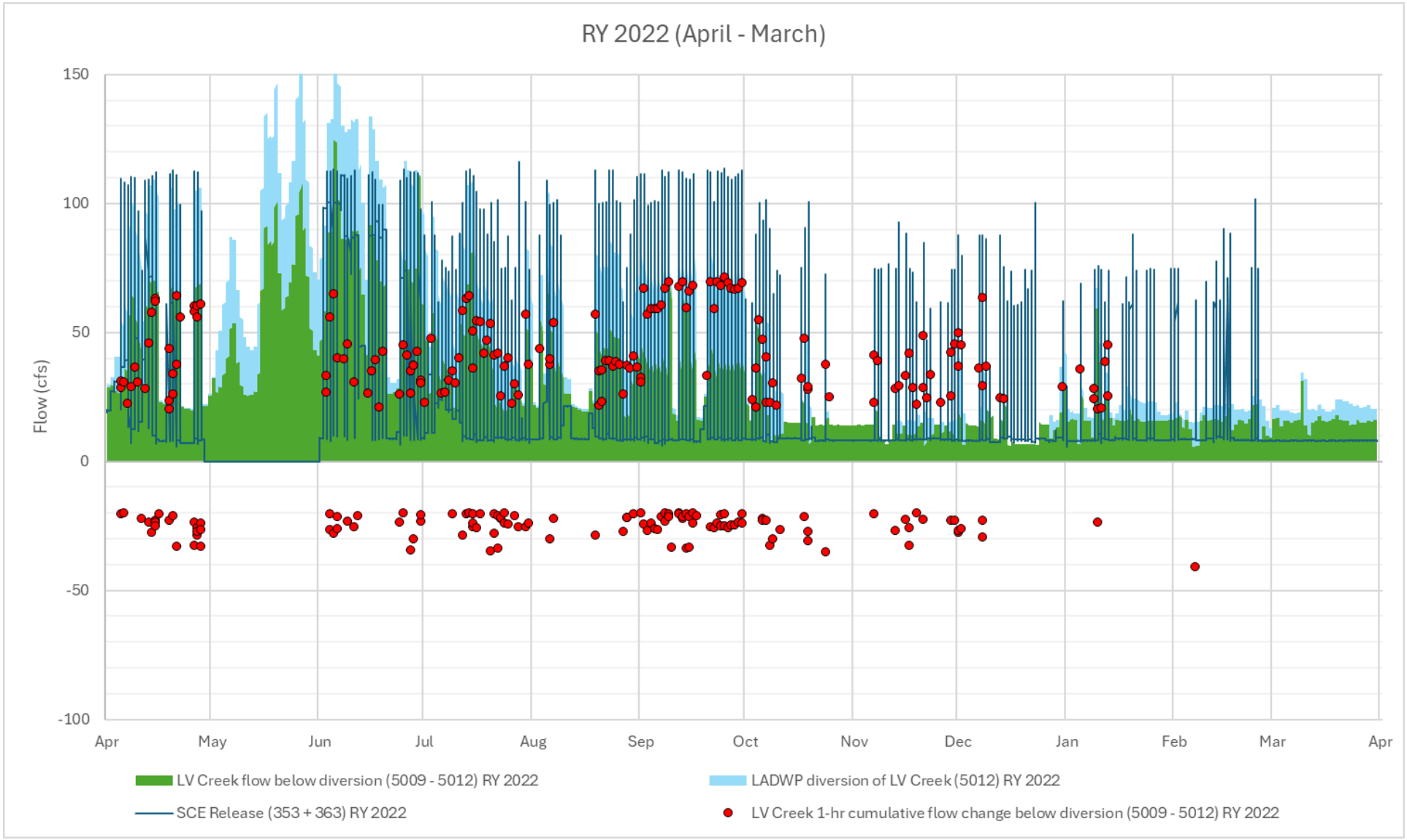

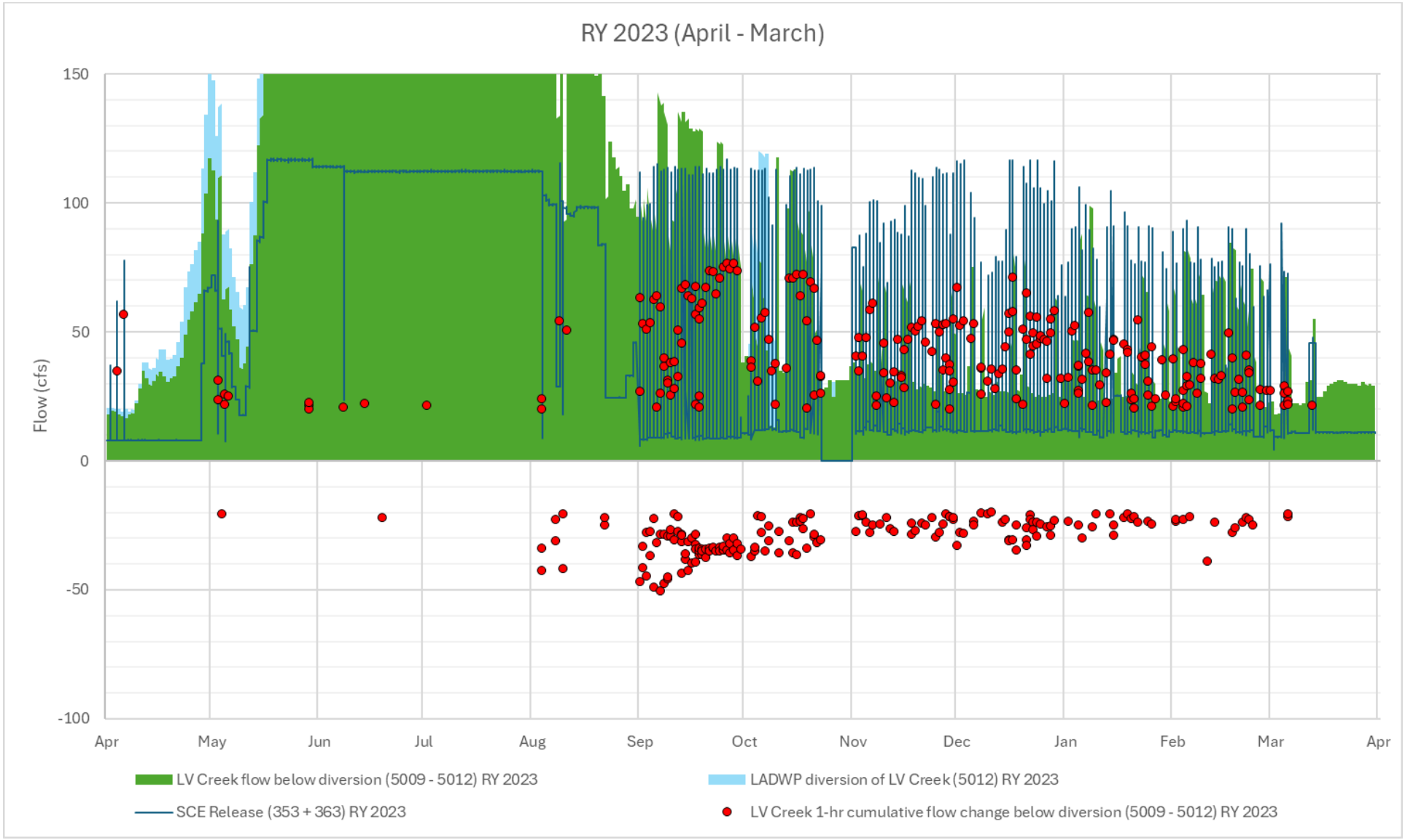
RY 2023 (April - March)
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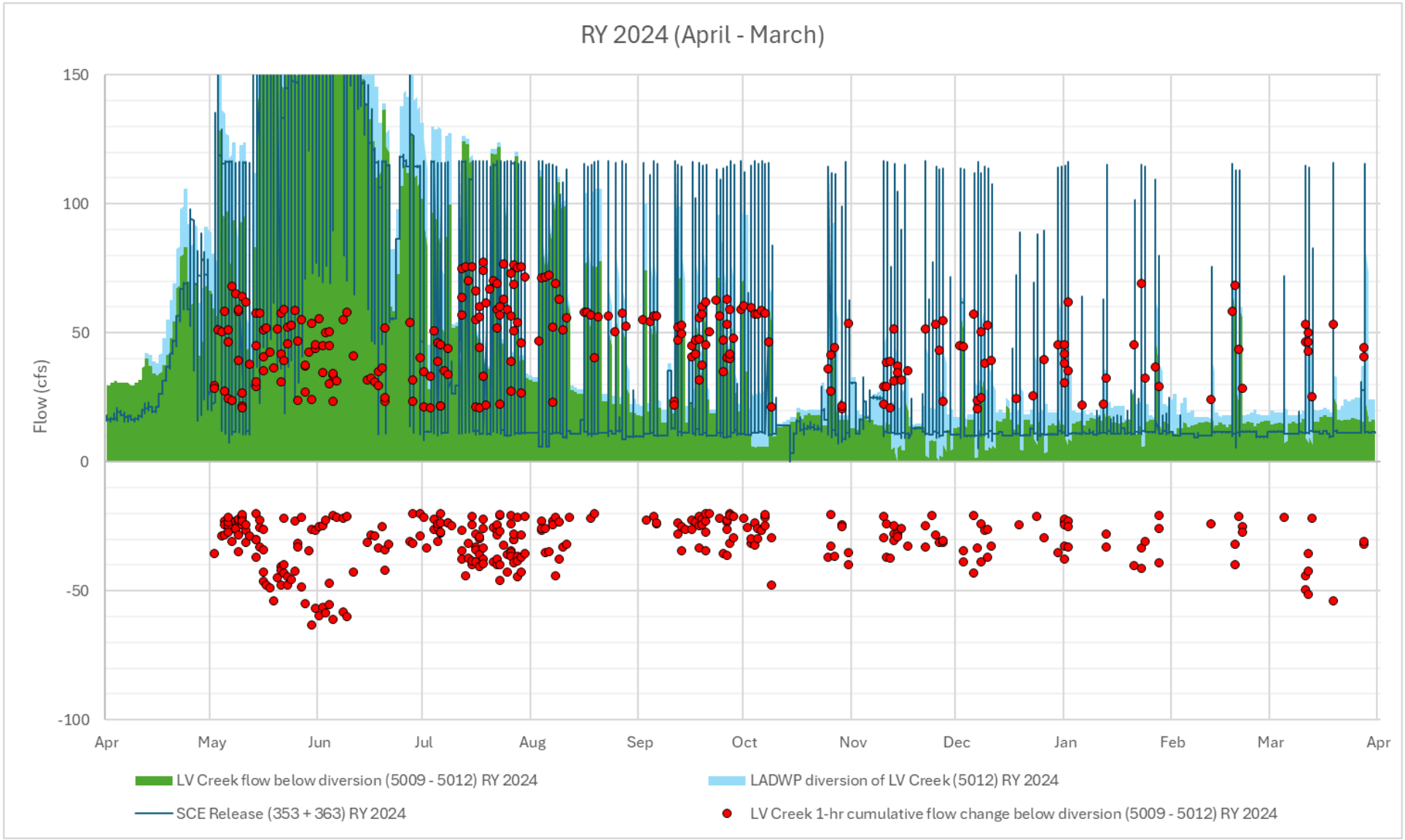
LV Creek flow below diversion (5009 - 5012) RY 2023
LADWP diversion of LV Creek (5012) RY 2023
SCE Release (353 + 363) RY 2023
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2023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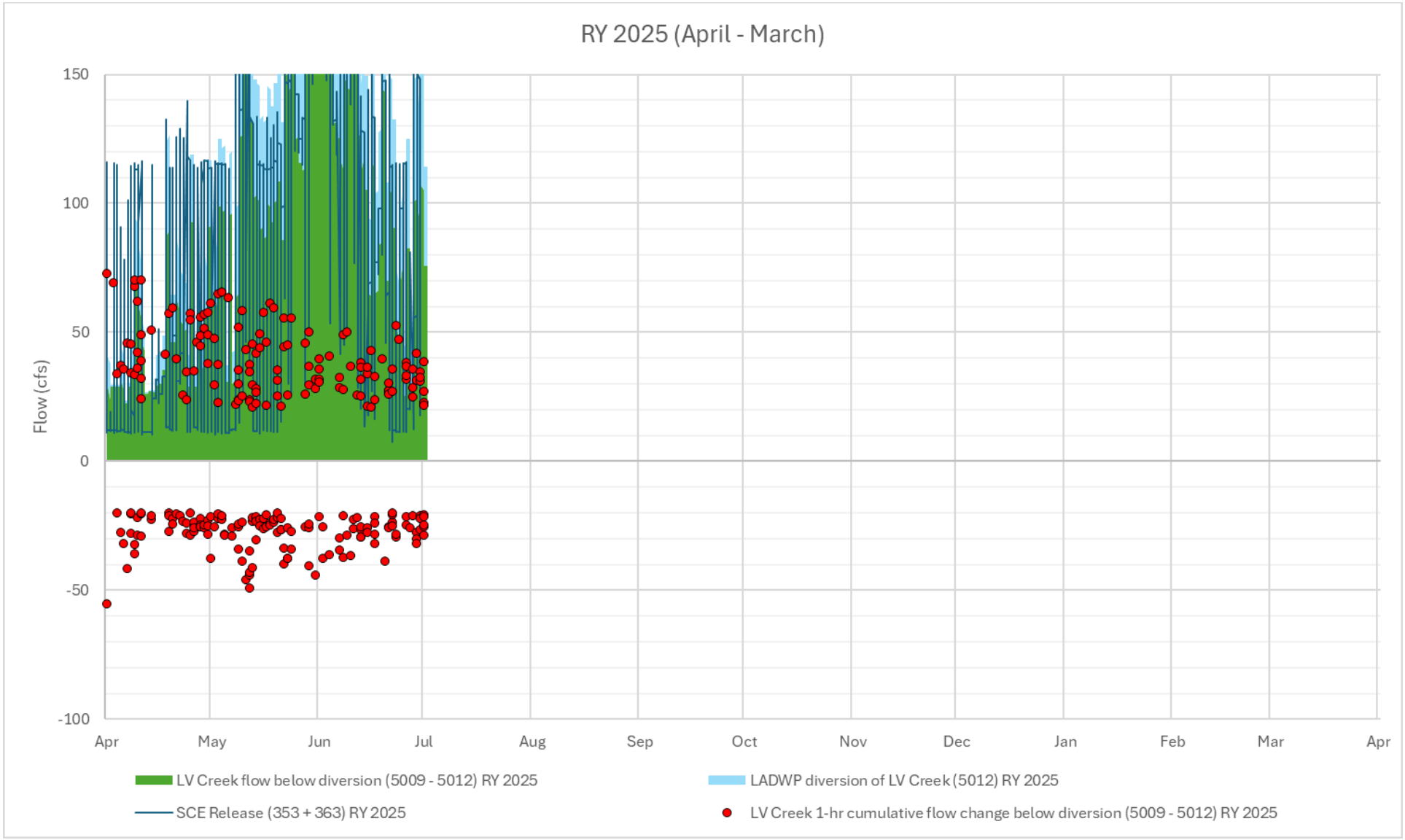
LV Creek flow below diversion (5009 - 5012) RY 2024
LADWP diversion of LV Creek (5012) RY 2024
SCE Release (353 + 363) RY 2024
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2024


RY 2025 (April - March)
Flow (cfs)
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LV Creek flow below diversion (5009 - 5012) RY 2025
LADWP diversion of LV Creek (5012) RY 2025
SCE Release (353 + 363) RY 2025
LV Creek 1-hr cumulative flow change below diversion (5009 - 5012) RY 2025

CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

CALIFORNIA Water Boards

GAVIN NEWSOM
GOVERNOR

YANA GARCIA
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

October 31, 2025

Ms. Debbie-Ann Reese, Secretary
Federal Energy Regulatory Commission
Via e-filing to FERC Project Docket No. 1388

Lee Vining Hydroelectric Project
Federal Energy Regulatory Commission Project No. 1388
Mono County
Lee Vining Creek, Glacier Creek, Ellery Lake, Tioga Lake, and Saddlebag Lake

COMMENTS ON THE NOTICE OF SCOPING PERIOD REQUESTING COMMENTS ON ENVIRONMENTAL ISSUES FOR THE PROPOSED LEE VINING HYDROELECTRIC PROJECT

Dear Secretary Reese:

Southern California Edison Company (SCE) owns and operates the Lee Vining Hydroelectric Project (Project), also referred to as Federal Energy Regulatory Commission (FERC) Project No. 1388. As part of Project relicensing, on October 1, 2025, FERC issued its *Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project* (Notice), initiating a 30-day comment period for interested parties to comment on the scope of FERC's future National Environmental Policy Act (NEPA) document for the Project.

State Water Resources Control Board (State Water Board) staff have reviewed FERC's Notice and are providing comments in *Attachment A: State Water Resources Control Board Staff Comments on the Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project.*

If you have questions regarding this letter and State Water Board staff's comments, please contact Bryan Muro, Project Manager, by email to: Bryan.Muro@waterboards.ca.gov or by phone call to: (916) 327-8702. Written correspondence should be directed to:

State Water Resources Control Board
Division of Water Rights
Water Quality Certification Program
Attn: Bryan Muro
P.O. Box 2000
Sacramento, CA 95812

Sincerely,

Bryan Muro

Bryan Muro
Project Manager
Water Quality Certification Program
Division of Water Rights

Attachment A: State Water Resources Control Board Staff Comments on Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project

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Rebecca.Kipp@ferc.gov

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Southern California Edison Company
Matthew.woodhall@sce.com

Tristan Leong, National Hydropower Program Assistant Manager
United States Department of Agriculture
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Chad Mellison, Fisheries Biologist
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Beth Lawson, Senior Hydraulic Engineer
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Graham Meese, Habitat Conservation Program Supervisor
California Department of Fish and Wildlife
Graham.Meese@Wildlife.ca.gov

ATTACHMENT A:

State Water Resources Control Board Staff Comments on Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project

The following comments are provided by State Water Resources Control Board (State Water Board) staff on the Federal Energy Regulatory Commission's (FERC) *Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project* (Notice) for Southern California Edison Company's (SCE) relicensing of the Lee Vining Hydroelectric Project (Project).

1. On July 23, 2025, in response to State Water Board staff's comment regarding SCE's Wading Suitability Relationship Memorandum and potential public safety concerns associated with hydropeaking, SCE sent FERC a revised Wading Suitability Memorandum. Tables 1 and 2 from SCE's revised Wading Suitability Memorandum are provided below for reference:

Table 1 Modeled Baseflows and Percent Annual Exceedance

Flow (cfs)	Annual Exceedance (%)*
10	98.3
27	47.6
50	19.2
89	6.5

*Annual exceedance based on actual daily flows for the period of record between 1997-2023.

Table 2 Stage Change and Time to Change from Baseflow to 110 cfs

Cross Section	Distance Downstream of Culvert on Power Plant Road (ft)	10 cfs to 110 cfs		27 to 110 cfs		50 to 110 cfs		89 to 110 cfs	
		Total Stage Change (ft)	Time Range[1] (min)	Total Stage Change (ft)	Time Range[1] (min)	Total Stage Change (ft)	Time Range[1] (min)	Total Stage Change (ft)	Time Range[1] (min)
4,616	128	1.68	<1-4	1.2	<1-4	0.71	<1-4	0.21	2-3
3,967	777	0.96	<1-9	0.71	1-8	0.45	2-8	0.14	3-7
2,946	1,798	1.04	1-15	0.68	2-14	0.4	2-14	0.11	4-13
1,321	3,423	1.36	1-31	0.97	2-27	0.62	3-26	0.2	5-23
834	3,910	1.41	3-39	1.01	3-38	0.66	3-36	0.2	8-32

1 Length of time it takes for the stage change to level out, as measured from initial change of 0.1 feet.

In Table 1, the calculated annual exceedance percentages, which represent how often SCE exceeded the flows shown Table 1 (above), do not accurately represent the actual exceedances based on the Project's current operations. SCE only began its current hydropeaking operations in 2015, while the exceedance percentages were developed using the average daily flows for the period of record between 1997-2023. Data included in these calculations from the period of 1997-2014 should not be included in annual exceedance percentages associated with current hydropeaking events, since they pre-date current hydropeaking operations[1]. To further illustrate the discrepancy, *Figure 5.2-1 Flow in Lee Vining Creek Downstream of Poole Powerhouse* from SCE's Operations Modeling Study (AQ-5) is provided below:

[1] Hydropeaking between 2010 and 2014 occurred on average less than twice per season which is not representative of current hydropeaking operations.

ATTACHMENT A:
State Water Resources Control Board Staff Comments on Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project

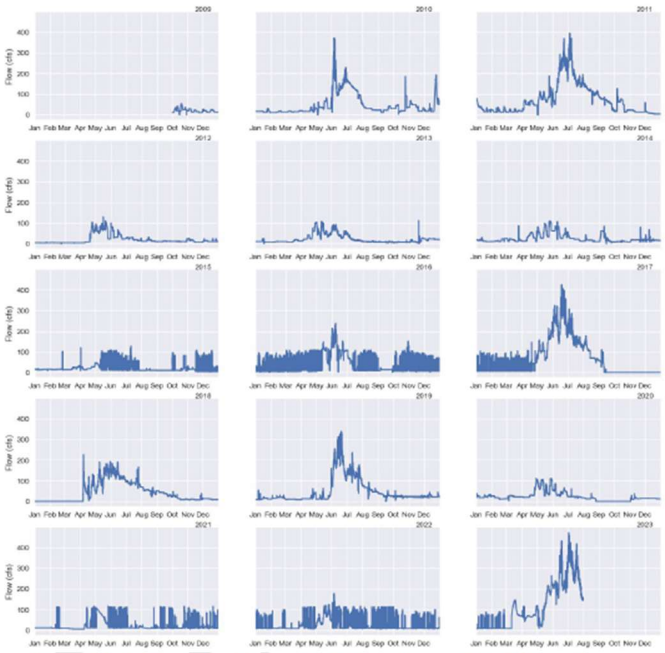

Figure 5.2-1. Flow in Lee Vining Creek Downstream of Poole Powerhouse.

Comparing the hydrographs depicted in Figure 5.2-1, significant changes in flow variability relating to SCE's hydropeaking events are observed beginning in 2015. Since hydropeaking events began, the magnitude and frequency of the hydropeaking events have increased, altering flows downstream of Poole Powerhouse relative to prior operations. SCE's AQ-5 Operations Model states that the frequency of hydropeaking events have increased from an average of less than twice per season 2010 – 2014, to an average of more than 37 times per winter from 2015 – 2023.

Additionally, as noted in SCE's revised Wading Suitability Memorandum and shown in Table 2 above, the furthest downstream cross section in SCE's stage change model (Cross Section 834) is located upstream of the nearest campground below Poole Powerhouse which may not accurately account for hydropeaking effects to campgrounds and associated public access.

Though SCE's revised Wading Suitability Memorandum states that extending the analysis downstream is not warranted given the hydropeaking effects attenuate with distance downstream, State Water Board staff disagree and think additional analysis is warranted. State Water Board staff have developed the below figure (Figure 1) based on SCE's revised Wading Suitability Memorandum, which indicates that stage change attenuation downstream is low, and is likely more closely related to channel shape.

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State Water Resources Control Board Staff Comments on Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project

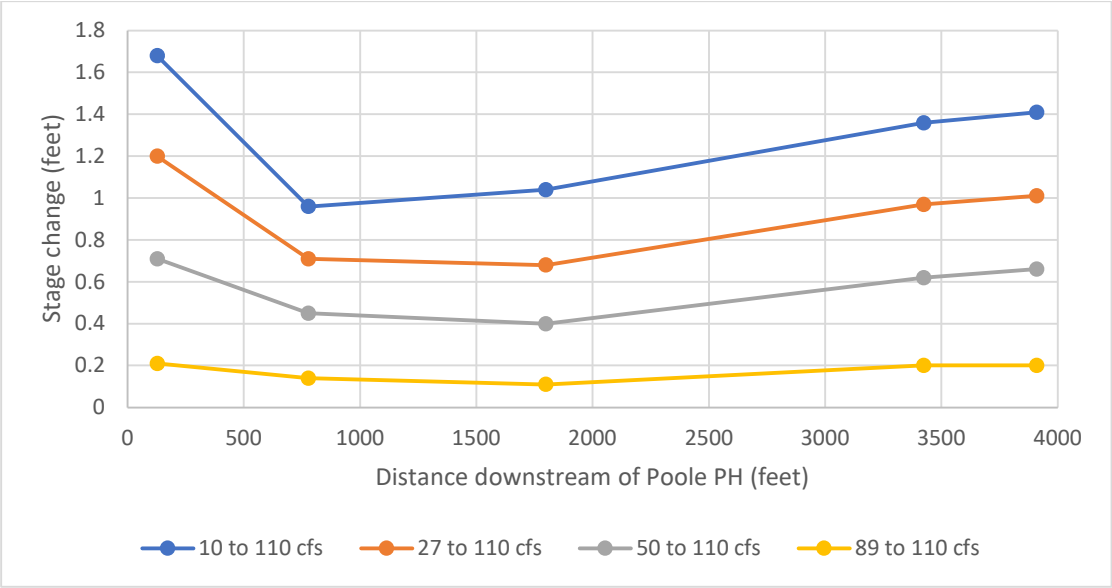

Figure 1. Stage changes based on typical hydropeaking flows downstream of Poole Powerhouse

State Water Board staff request FERC include in its NEPA process a comprehensive analysis for public safety associated with SCE's hydropeaking events, focused on relevant locations along lower Lee Vining Creek where recreation primarily occurs, considering attenuation and channel morphology effects on stage change associated with hydropeaking, along with measures to ensure public safety, as needed.

2. SCE attributes low dissolved oxygen concentrations in Saddlebag and Tioga lakes to natural reservoir conditions and watershed biology, and pH variations to low buffering capacity rather than Project operations. State Water Board staff disagree that Project operations do not influence dissolved oxygen and pH in Saddlebag and Tioga lakes.

Additionally, SCE asserts that Project operations are "not associated with direct turbidity discharges to lower Lee Vining Creek" and that turbidity increases observed during hydropeaking do not exceed Basin Plan objectives or effect beneficial uses. SCE attributes the changes to natural remobilization of sediments. State Water Board staff emphasize that compliance with numeric and narrative water quality objectives, beneficial uses, and antidegradation policy requirements as listed in the Lahontan Basin Plan will be evaluated as part of the Project's future certification process associated with relicensing and should be considered as part of FERC's NEPA process. Adequate information on the Project's effects to water quality is needed to inform a future certification action. State Water Board staff request that FERC analyze the extent to which Project operations affect water quality and comply with requirements of the Lahontan Basin Plan.

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3. Appendix E: *Mercury in Fish Tissue Results* of SCE's WQ-1 study found that the mean total mercury for fish in Saddlebag Lake and Tioga Lake is 0.121 and 0.056 micrograms per gram wet weight (µg/g ww), respectively. These data are within the USEPA 304(a) recommended criterion standards for concentrations of methylmercury in fish tissue of 0.2 mg/kg. However, on May 2, 2017, the State Water Board adopted Resolution 2017-0027, which approved "Final Part 2 of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California - Tribal and Subsistence Fishing Beneficial Uses and Mercury Provisions." Resolution 2017-0027 established new beneficial use definitions for tribal beneficial uses: Tribal Tradition and Culture (CUL), Tribal Subsistence Fishing (T-SUB), and Subsistence Fishing (SUB). Five new Mercury water quality objectives were established in the resolution. The Lahontan Regional Water Resources Control Board is proposing to amend the Lahontan Basin Plan to designate Tribal Beneficial Uses to waterbodies in the Mono Basin, including Tioga and Saddlebag lakes. If the Basin Plan is amended, Saddlebag and Tioga lakes mercury concentrations have the potential to exceed the tribal beneficial use objectives. Table 2 in the *Development of Fish Contaminant Goals and Advisory Tissue Levels (ATLs) for Common Contaminants in California Sport Fish*[2] issued by the Office of Environmental Health Hazard Assessment (OEHAA) recommends women between the ages of 18-45 and children between the ages of 1-17 consume no more than between 70-150 parts per billion (ppb) of mercury when consuming two 8-ounce servings of fish per week to avoid non-cancer risk[3]. To avoid risk for higher frequencies of consumption (i.e. three 8-ounce servings per week, four 8-ounce servings per week, etc.) OEHAA recommends under 70 ppb of mercury. Converting the results of the 2022-2023 technical reports from µg/g ww to ppb yields a mean total mercury concentration in fish of 121 ppb and 56 ppb for Saddlebag and Tioga lakes, respectively.

   State Water Board staff request that FERC consider the Statewide Mercury Provisions, the Project's potential impacts to mercury and mercury methylation, and potential measures to better notify the public of the elevated levels of mercury in fish tissues in Project reservoirs or otherwise mitigate this impact (e.g. posting signage at Project reservoir).

4. State Water Board staff continue to have concerns related to the Project's potential effects on fish stranding and fish populations. Additionally, SCE maintains that no significant impacts (including to fish stranding and populations) related to hydropeaking have been identified, and that the scope of analysis should be confined to upstream of Los Angeles Department of Water and Power's (LADWP) diversion dam. However, new

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[2] Available online at: https://oehha.ca.gov/sites/default/files/media/downloads/fish/report/atlmhgandothers2008c.pdf

[3] For each chemical, ATLs were calculated separately for cancer and non-cancer risk, if appropriate, for consumption frequency categories of one, two, and three 8-ounce servings per week. Values for cancer and non-cancer risk were then compared to determine whether the cancer or non-cancer value was the most health protective.

analyses by the Mono Lake Committee, using SCE and LADWP flow data, show that SCE's flow fluctuations extend downstream to Mono Lake (Figure 2, below). These reaches have broader, less confined channels, potentially increasing aquatic habitat vulnerability. State Water Board staff request that the geographic scope of FERC's NEPA analysis extend through Lee Vining Creek downstream of Poole Powerhouse to Mono Lake, to appropriately capture the potential effects of hydropeaking on fish populations and stranding.

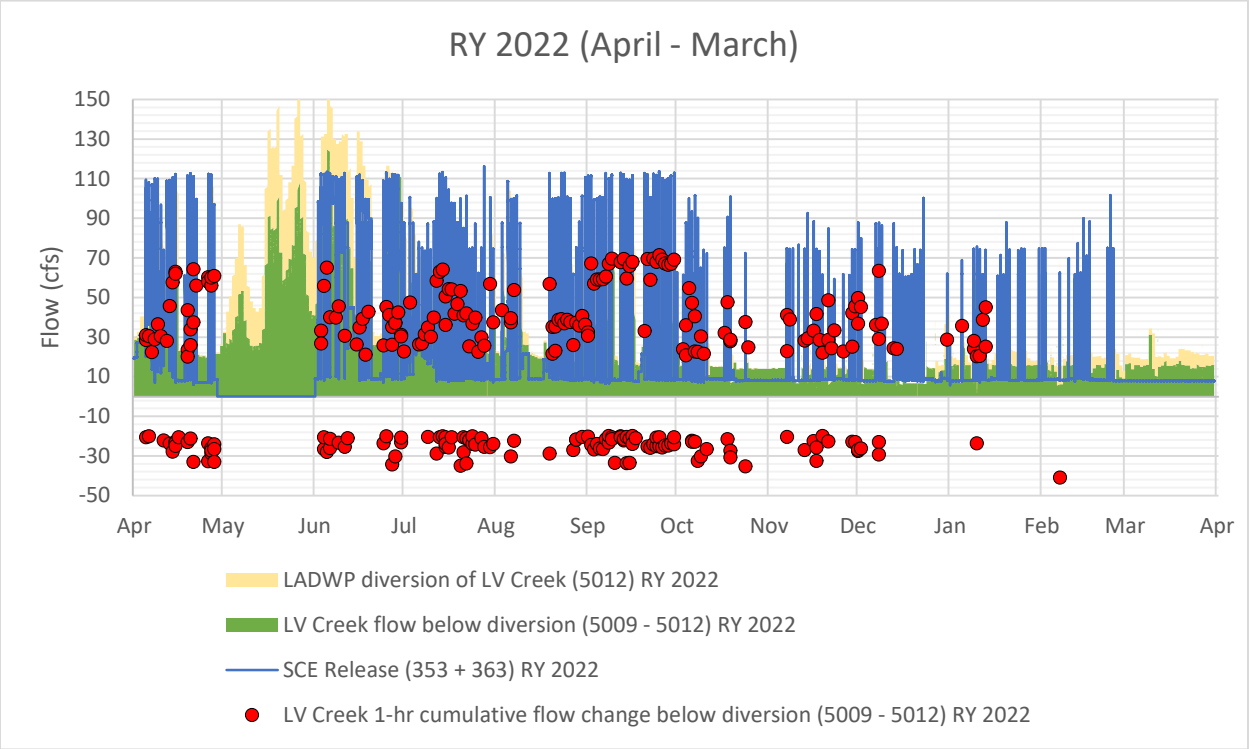

Figure 2: Fluctuations of flows downstream of Poole Powerhouse

5. In response to concerns of *Didymosphenia geminata* (Didymo) and the need for potential measures to manage it, SCE states "…Section 6.5.2.2 of the DLA indicates that high flows in 2023 may have removed masses of previously observed Didymo. Findings of this study suggest that Didymo populations are episodic in the Lee Vining Creek Watershed. Specific control measures are not warranted given the current lack of a Didymo issue and the lack of Project nexus...the Project is not the source of nor likely to contribute to the introduction or spread of Didymo." Once established in a waterbody, Didymo may not be eradicated without significant effort. Instead, Didymo stalk growth may result in nuisance mats because of a variety of environmental factors, but the algae

remain present in the waterbody even after the mats are scoured or not visibly present (EPA 2008[4]; Whitton et al. 2009[5]).

While it is accurate that the Project is likely not the source of Didymo in Lee Vining Creek, prior research conducted specifically on Lee Vining Creek and Slate Creek previously cited by State Water Board staff (Rost and Fritsen 2014[6]), indicates that Project operations are likely related to the presence of Didymo nuisance growth in Lee Vining Creek. Dampened peak flows caused by storage in Saddlebag Lake may prevent annual scouring of Didymo growth, as may have occurred in the 2023 study season when flows were abnormally high, and increased dry season flow relative to natural conditions may allow Didymo growth to persist throughout the winter. State Water Board staff request that FERC consider measures to mitigate the impact of Project operations which may allow for the growth of nuisance algal mats in Lee Vining Creek.

6. Comments from representatives of the State Water Board, California Department of Fish and Wildlife (CDFW), and United States Fish and Wildlife Service on the DLA included concerns of Project operations possibly affecting Yosemite toad (*Anaxyrus canorus*) populations and habitat. Generally, State Water Board staff found SCE's studies from the 2022-2023 field seasons provided inconclusive evidence of Project-related effects on the Yosemite toad. In response to State Water Board staff's DLA comments, SCE stated that an additional study season (2024) was in progress and not included in the FLA filed on January 27, 2025.

SCE included the results of the 2024 study season in its August 13, 2025 filing of the *Biological Assessment for Sierra Nevada bighorn sheep (Ovis canadensis sierrae), Yosemite toad (Anaxyrus canorus), and whitebark pine (Pinus albicaulis)* (BA). The results from the 2024 study season yielded similar observations as 2023 where potential evidence of the presence of Yosemite toad breeding was observed at south of Saddlebag Lake, upper Lee Vining Creek, and Tioga Lake. Notably, the potential evidence of Yosemite toad breeding observed at Tioga Lake during the 2024 season differed in location compared to the 2023 season indicating the toad species may be migrating around the Project area.

Additionally, State Water Board staff submitted comments raising the importance of DNA sample results of potentially interbred toads[7] found during the 2023 study season.

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[4] Available online at: Didymo: a Nuisance and invasive freshwater alga
[5] Whitton, B.A., Ellwood, N.T.W. and Kawecka, B., 2009. Biology of the freshwater diatom Didymosphenia: a review. *Hydrobiologia*, *630*(1), pp.1-37.
[6] Rost, A.L. and Fritsen, C.H., 2014. Influence of a tributary stream on benthic communities in a Didymosphenia geminata impacted stream in the Sierra Nevada, USA. Diatom Research, 29(3), pp.249-257.
[7] Appendix A: *Yosemite Toad Technical Report* of the *General Wildlife Resources Survey Technical Report* (TERR-2) states that the Yosemite toad are known to interbreed with the western toad in multiple locations within California.

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In response, SCE's response provided in the FLA stated "SCE disagrees that DNA is vital in helping determine if Project operations affect critical habitat for the Yosemite toad (Anaxyrus canorus). Further, while the DNA sampling will help determine if hybridization has occurred in the breeding habitat adjacent to the FERC Project Boundary by Saddlebag Lake and upper Lee Vining Creek, the DNA results will not be available in time to inform the DLA." DNA sampling results will inform whether the toads are interbred or whether observed populations are Yosemite toad, which is listed under the federal Endangered Species Act and designated as a Species of Special Concern by CDFW.

State Water Board staff have yet to receive the DNA results for the toad nor were the DNA results included in either the DLA, FLA, or SCE's BA. The BA states the DNA collected in 2023 will be compared against a hybrid genetic panel for both the Yosemite toad and western toad being developed by the Eldorado National Forest. The lack of the DNA results from the FLA and BA combined with study information on Project-related effects on potential critical habitat and populations of Yosemite toad surrounding the Project indicates additional analysis may be warranted. As a result, State Water Board staff request FERC to further analyze the effects of Project operations on Yosemite toad critical habitat and populations within Project waterbodies as part of its NEPA process.

7. The current FERC license requires minimum flows below Poole Powerhouse of 27 cfs (August–May) and 89 cfs (June–July) or "natural flow, whichever is less." The current FERC license does not clarify how "natural flow" is determined. SCE's FLA proposes to continue to provide minimum flows below Poole Powerhouse in a manner consistent with the existing license and does not clarify how natural flow is determined.

   SCE's Operations model calculates the total unimpaired inflow to Ellery Lake (i.e., natural flow') as the sum of calculated unimpaired inflows to Saddlebag and Tioga lakes, and calculated unimpaired inflows to Ellery (i.e., subtracting the managed releases from Saddlebag and Tioga lakes). State Water Board staff have analyzed SCE's model output with available United State Geological Service data from 1997–2023 which suggests the Project may not always provide minimum flow or 'natural flow' (Figure 4). State Water Board staff request that as part of its NEPA analysis, FERC analyze the Project's ability to meet full natural flow and future minimum instream requirements.

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State Water Resources Control Board Staff Comments on Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Lee Vining Hydroelectric Project

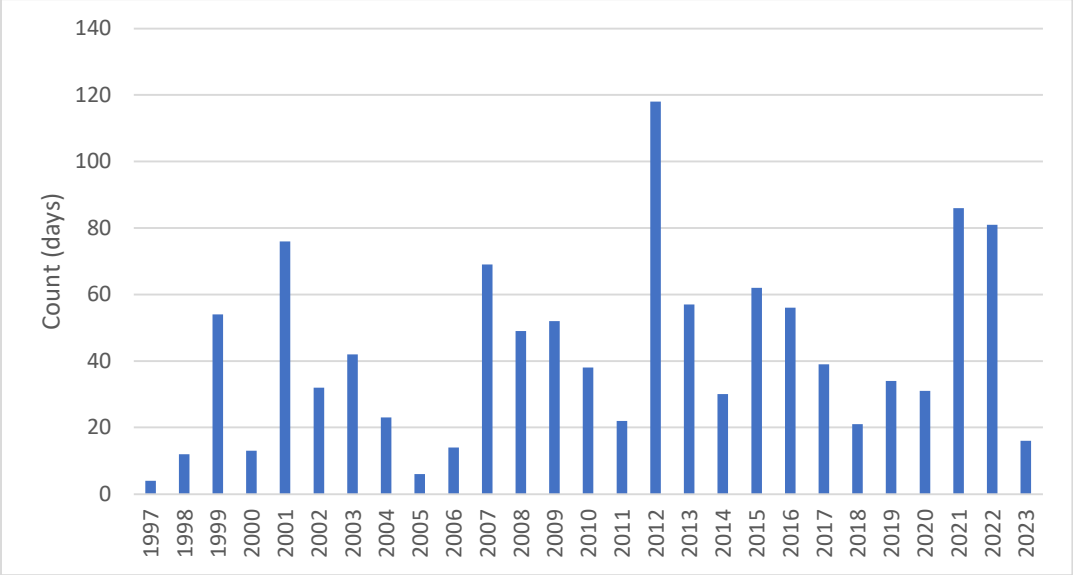

Figure 4: Days per year where combined Poole Powerhouse release and Rhinedollar spill is less than either the minimum flow or unimpaired inflow to Ellery Lake.

ATTACHMENT 2

SCE RESPONSES TO STAKEHOLDER SCOPING COMMENTS

Introduction

On October 1, 2025, the Federal Energy Regulatory Commission (FERC) issued its Notice of Scoping Period (Scoping Notice),[1] which requested comments on the scope of issues to address in the environmental document that FERC will prepare in the relicensing of the Lee Vining Hydroelectric Project, FERC Project No. 1388 (Project), pursuant to the National Environmental Policy Act (NEPA). In response, the California Department of Fish and Wildlife (CDFW), Mono Lake Committee (MLC), and California State Water Resources Control Board (SWRCB) submitted comment letters to FERC.

In this response comment document, Southern California Edison (SCE) has separated the comments received into three categories:

- Comments relating to or requesting Protection, Mitigation, and Enhancement (PME) measures
- Study Requests
- Scoping comments

Protection, Mitigation, and Enhancement Measures

The purpose of FERC's Scoping Notice was to solicit NEPA scoping comments, not proposed PME measures for the relicensing of the Project. Although several stakeholders submitted (or identified) proposed PME measures in their comments, such as recommendations related to signage, fish stocking, and ramping rates, SCE is not responding to these PME proposals at this time. Once FERC determines that SCE's Final License Application (FLA) is ready for environmental analysis (REA), it will issue its REA Notice per 18 Code of Federal Regulations (CFR) 4.34(b), which will provide an opportunity for stakeholders to submit recommended and mandatory PME measures. As authorized by 18 CFR 4.34(b), SCE will respond to proposed PME measures submitted in response to FERC's REA notice.

SCE notes, however, that it is in active discussions with stakeholders regarding appropriate PME measures and looks forward to the continued dialogue.

[1] Accession Number 20251001-3050

Study Requests

In response to FERC's Scoping Notice, several stakeholders submitted study requests. These requests were originally submitted following FERC's February 12, 2025[2] FLA tendering notice per 18 CFR 4.32(b)(7). SCE has responded to those study requests, demonstrating that these studies are unnecessary, as indicated in its August 13, 2025 submission to FERC.[3] SCE understands that FERC will address the requested studies at the appropriate time in this process, and for these reasons, SCE has not addressed those study requests in this filing.

Scoping Comments

On July 23, 2025,[4] SCE filed a response to comments received from stakeholders in response to FERC's FLA tendering notice. That letter addressed comments related to water quality (turbidity), fish stranding and fish populations, and future operations. SCE's July 2025 response comments are robust and rely on adequately scoped and executed relicensing studies and collected data. To the extent that stakeholders' comments in response to FERC's Scoping Notice reiterate issues related to turbidity, fish stranding and fish populations, and future operations, those topics are not discussed further here, as SCE's July 2025 response comment adequately addressed those matters.

In the discussion that follows, remaining and "new" scoping comments have been summarized and grouped together by topic, with SCE responses immediately following. In many instances, SCE incorporates previous filings by reference, including the FLA[5] and the filings from July and August 2025.

Hydro-Resource Optimization

Public safety and wading conditions relating to hydro-resource optimization.

Comment: The SWRCB and CDFW raised issues related to recreationist safety, specifically the following:

[2] Accession Number 20250212-3015
[3] Accession Number 20250813-5058
[4] Accession Number 20250723-5119
[5] Accession Number 20250214-5163

- Rapid stage changes (up to ~1.3 feet in 4 minutes) pose safety risks for recreationists, especially children at campgrounds.
- Wading Suitability Memorandum analysis used pre-2015 data and did not extend far enough downstream.
- Agencies request NEPA analysis of public safety risks and consideration of active warning systems or ramping restrictions.

SCE Response: A Final Revised Wading Suitability Memorandum is attached to this filing; the analysis has been updated from the draft memorandum previously distributed in July 2025 to reflect only the 2015–2024 period. The selected model domain extends to a point at which flow attenuation from hydro-resource optimization is clear. The changes in depth and velocity may continue farther downstream, but the creek's response time to these changes is noticeably slower at the downstream extent of the model and is expected to be attenuated further as the water travels farther downstream from Poole Powerhouse. In its July 23, 2025 filing, SCE committed to adding additional safety signs at campground kiosks along lower Lee Vining Creek to supplement the existing safety signage immediately below Poole Powerhouse and near the creek. SCE is not aware of any safety incidents or reports below Poole Powerhouse.

Frequency, magnitude, and ramping.

Comment: CDFW and MLC submitted comments surrounding the frequency and magnitude of hydro-resource optimization:

- Hydro-resource optimization is a relatively new practice and may increase in frequency under the new license.
- Agencies request cumulative impact analysis and ramping restrictions, and they propose an economic trade-off study.
- Agencies expressed concern that current studies do not quantify long-term effects or alternative scenarios.

SCE Response: Hydro-resource optimization has occurred since 2015 under existing license terms. As discussed in the August 6, 2025 Technical Working Group meeting, and provided in SCE's August 13, 2025 FERC filing, the timing, frequency, and duration of hydro-resource optimization events are variable; however, they are all constrained by annual water availability after taking into account base flows (minimum instream flows), reservoir limitations, and drawdown parameters.

Using 2023 as a representative year where SCE optimized water as much as possible, SCE presented Figure 1 to illustrate that an increase in frequency of hydro-resource optimization would not be possible on a seasonal or even an annual basis. However, stakeholders have misinterpreted these data in their recent comments and are using the period of record to highlight fluctuations in the frequency of hydro-resource optimization operations to assert a change in operations and a detrimental effect over the course of several years.

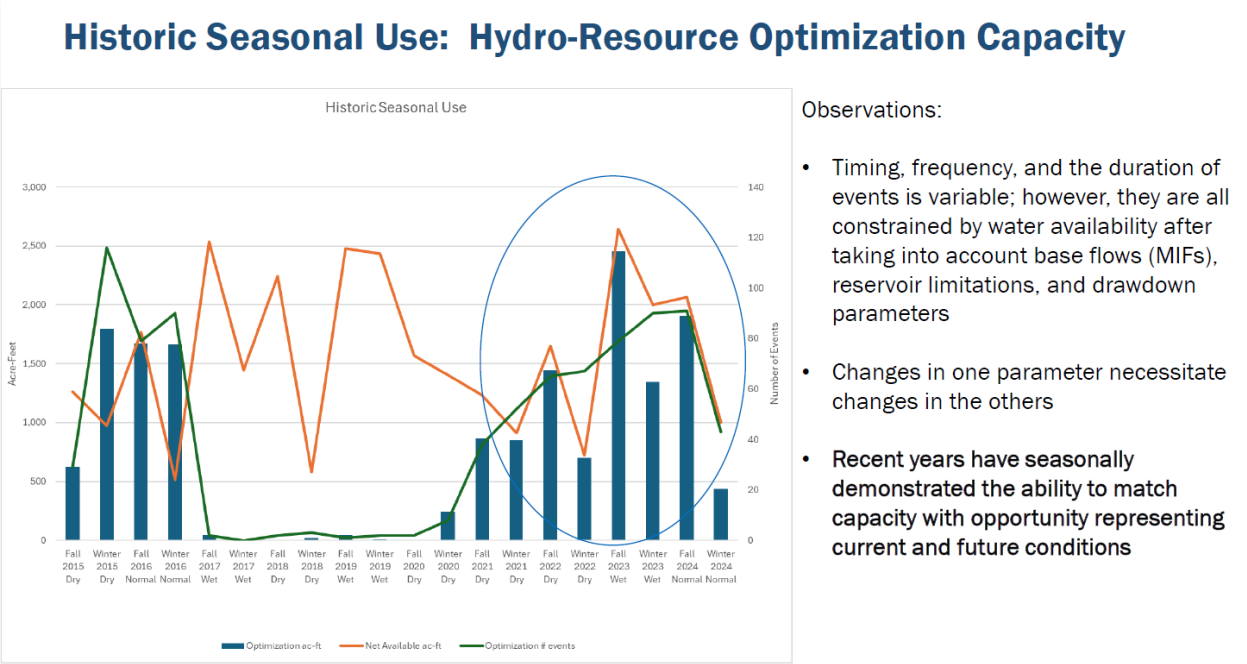

Figure 1 Hydro-resource optimization capacity based on historic seasonal use.

This figure shows the varied flow regime for lower Lee Vining Creek since hydro-resource optimization was utilized in 2015 and under which all the relicensing studies were implemented in 2022 and 2023, establishing a clear baseline in varied operations. SCE intends to operate the Lee Vining Project in a manner similar to how it is currently being managed. This includes the potential decision to implement hydro-resource optimization less frequently, but likely not more frequently, than is shown in Figure 1.

For these reasons, SCE is confident that it will not be able to increase the frequency of hydro-resource optimization events over a given year or even season.

Channel Morphology and Sediment

Comment: CDFW and MLC commented that hydro-resource optimization may mobilize fine sediments, degrade spawning gravels, and increase turbidity beyond the Lahontan Basin Plan limits. These stakeholders request a cumulative impact analysis of short-term disturbances.

SCE Response: The AQ-6 Channel Morphology study (FLA Volume III) found no evidence of long-term incision or aggradation. Substrate in the upper reach is classified as "semi-active," and sediment mobility is consistent with natural hydrologic variability (natural peak flows and storms). The AQ-3 Aquatic Habitat Mapping and Sediment Characterization study notes that spawning gravels are present and functional. Turbidity pulses during hydro-resource optimization are short-lived and within Lahontan Basin Plan objectives (WQ-1 Water Quality study).

Hydro-resource optimization may mobilize smaller sized sediment, including spawning gravels; however, results of Study AQ-6 indicate that mobilization of smaller sediments (e.g., 12-millimeter D_{50}) in lower Lee Vining Creek may be selective and may not occur even under peak magnitude (e.g., 470 cubic feet per second [cfs]) flow events. Selective mobility of smaller sediments is a common phenomenon in rivers and has been documented in lower Lee Vining Creek. Further, young-of-year and up to age 4+ brown trout were observed at the AQ-2 Stream Fish Populations study sampling site in the reach below Poole Powerhouse, where hydro-resource optimization occurs. These data indicate successful and regular spawning occurs based on the presence of multiple age classes. Therefore, there is no evidence to suggest that hydro-resource optimization alone or in combination with other natural or management mechanisms is significantly affecting fish spawning success in lower Lee Vining Creek.

Downstream Impacts below Los Angeles Department of Water and Power Diversion

Comment: SWRCB, CDFW, and MLC raised concerns regarding potential downstream impacts below the Los Angeles Department of Water and Power (LADWP) diversion dam:

- Hydro-resource optimization detected below LADWP diversion may affect habitat and restoration goals.
- Agencies request NEPA analysis of cumulative effects downstream to Mono Lake.

SCE Response: Relicensing studies indicate that hydro-resource optimization signals attenuate significantly with distance from Poole Powerhouse. Flow fluctuations below the LADWP diversion are controlled largely by their diversion operations under SWRCB Decision 1631 and forebay capacity rather than SCE's hydro-resource optimization activities. SCE's studies AQ-1 (Fish Populations), AQ-4 (Aquatic Habitat), and AQ-6 (Channel Morphology) upstream of the LADWP diversion demonstrate that Project operations have no significant adverse effect on spawning gravel quality and aquatic habitat. SCE's operations provide peak flows in the spring (April – June) that frequently exceed 250 cfs in wetter water year types. Flows greater than 250 cfs promote primary ecosystem functions such as riparian recruitment and sediment transport in Lee Vining Creek downstream of LADWP diversion (McBain and Taylor 2010). In accordance with SWRCB Decision 1631, LADWP allows SCE peak flows to pass the diversion. SCE hydro-resource optimization has the greatest potential to affect fish populations in Lee Vining Creek downstream of the LADWP diversion during baseflow periods. However, monitoring conducted by LADWP since 2000 confirms that resident fish populations downstream of the diversion have remained robust, healthy, and self-sustaining (Taylor 2023; LADWP 2024), with continued presence of ages 0 and 1+ brown and rainbow trout downstream of the diversion, indicating Project operations have a less than significant effect to the fish population in Lee Vining Creek below LADWP diversion dam.

References

McBain and Taylor. 2010. McBain & Trush, Inc. and Ross Taylor Associates (April 30, 2010). Mono Basin Stream Restoration and Monitoring Program: Synthesis of Instream Flow Recommendations to the State Water Resources Control Board and the Los Angeles Department of Water and Power, Final Report. California State Water Resources Control Board.

Taylor, R. 2023. Fisheries Monitoring Report for Rush, Lee Vining, Parker and Walker Creeks 2022. Los Angeles Department of Water and Power. 97 p.

ATTACHMENT 3

FINAL REVISED WADING SUITABILITY MEMO

MEMORANDUM

To: Matthew Woodhall, Project Manager – Southern California Edison (SCE)

From: Shannon Luoma, Project Manager – Kleinschmidt Associates (Kleinschmidt)

Cc: Stephanie Filcher (SCE), Finlay Anderson (Kleinschmidt)

Date: December 12, 2025

Re: Final Revised Wading Suitability Relationship

1.0 EXECUTIVE SUMMARY

This memorandum presents the final revised analysis of wading suitability in lower Lee Vining Creek downstream of Poole Powerhouse, addressing stakeholder concerns regarding public safety during hydro-resource optimization operations. The analysis expands upon the original methodology by incorporating additional age groups (including sub-teen and pre-school children) and updated operational assumptions based on recent SCADA data.

No standardized methodology for evaluating instream safety exists to evaluate these concerns. Pedestrian wading, crossing, and swimming safety depend upon the depth, velocity, substrate material, water and air temperature, weather, pedestrian age and ability, and other environmental and individual concerns. The relationship between water velocity, depth, and wading suitability is discussed in "Flow Requirements for Recreation and Wildlife in New Zealand Rivers" (Mosley 1983), which illustrates easy/moderate and difficult wading conditions as a plot of depth versus velocity. These relationships can be used to assess the issues raised by stakeholders.

Using the AQ-5 hydraulic model, Kleinschmidt evaluated depth and velocity relationships at five cross sections under multiple flow scenarios (baseflows of 10, 27, 50, and 89 cfs combined with powerhouse releases of 0, 50, and 110 cfs). Results were compared against Mosley (1983) wading criteria and USGS safety guidelines.

This analysis provides context for evaluating recreation safety under current and future operations. While hydropeaking influences wading conditions near the powerhouse, effects attenuate downstream, as they move closer to the campgrounds and planned operational automation is expected to decrease the rate of increase in flow. Recreators should exercise caution when near water, particularly regulated streams, as conditions can change rapidly.

2.0 WADING SUITABILITY RELATIONSHIP

During the review of the technical reports and development of the Draft License Application (DLA), stakeholders raised questions relating to Southern California Edison's (SCE) hydro-resource optimization and potential impacts on recreation safety downstream of the Lee Vining Creek Hydroelectric Project's Poole Powerhouse.

A preliminary wading suitability relationship memorandum was filed with the Final License Application (FLA) in January 2025. Following that filing, in March 2025, the State Water Resources Control Board and California Department of Fish and Wildlife filed additional comments surrounding wading suitability—particularly around expanding the analysis to include "sub-teen children" and "pre-school children." These age groups were not included in the original analysis, as it was assumed they would not be recreating in lower Lee Vining Creek independently or unattended; however, the analysis has been expanded to include these age groups in this memorandum.

The one-dimensional hydraulic model developed as part of the AQ-5 study spans lower Lee Vining Creek from below Poole Powerhouse to the waterfall near Big Bend Campground, approximately 4,200 feet downstream. The model was run with 0, 50, and 110 cubic feet per second (cfs) powerhouse flows at four different baseflows (10, 27, 50, and 89 cfs). These flows were selected to represent typical operating conditions but not flood or spill conditions. This analysis helps illustrate the potential effect of the powerhouse discharges at different baseflows on safety in the downstream channel. The selected baseflows and the respective exceedance probabilities are discussed in Table 1.

Table 1 Modeled Baseflows and Percent Annual Exceedance

Flow (cfs)	Annual Exceedance (%)*
10	69.8
27	33.5
50	25.7
89	14.8

*Annual exceedance is based on 15-minute outflows (generation + spill) for the period of record between 2015-2024.

3.0 INSTANTANEOUS OPERATIONS

For reference, the approximate time needed for the stage change to reach each cross section is summarized in Table 2 below, shown for the four baseflows presented in Table 1. The time range presented in Table 2 indicates the amount of time, from beginning to end, it takes for the creek to have a stage change of 0.1 foot (1.2 inches) until it levels out at a steady water level for each flow change at each cross section (Figure 1). This assumes

an instantaneous (1-minute) flow change from Poole Powerhouse. Note that the furthest downstream cross section is still upstream of the first campground.

Table 2 Stage Change and Time to Change from Baseflow to 110 cfs

Cross Section	Distance Downstream of Culvert on Power Plant Road (ft)	10 to 110 cfs		27 to 110 cfs		50 to 110 cfs		89 to 110 cfs	
		Total Stage Change (ft)	Time Range* (min)	Total Stage Change (ft)	Time Range* (min)	Total Stage Change (ft)	Time Range* (min)	Total Stage Change (ft)	Time Range* (min)
4,616	128	1.68	<1-4	1.2	<1-4	0.71	<1-4	0.21	2-3
3,967	777	0.96	<1-9	0.71	1-8	0.45	2-8	0.14	3-7
2,946	1,798	1.04	1-15	0.68	2-14	0.4	2-14	0.11	4-13
1,321	3,423	1.36	1-31	0.97	2-27	0.62	3-26	0.2	5-23
834	3,910	1.41	3-39	1.01	3-38	0.66	3-36	0.2	8-32

*Length of time it takes for the stage change to level out, as measured from initial change of 0.1 feet.

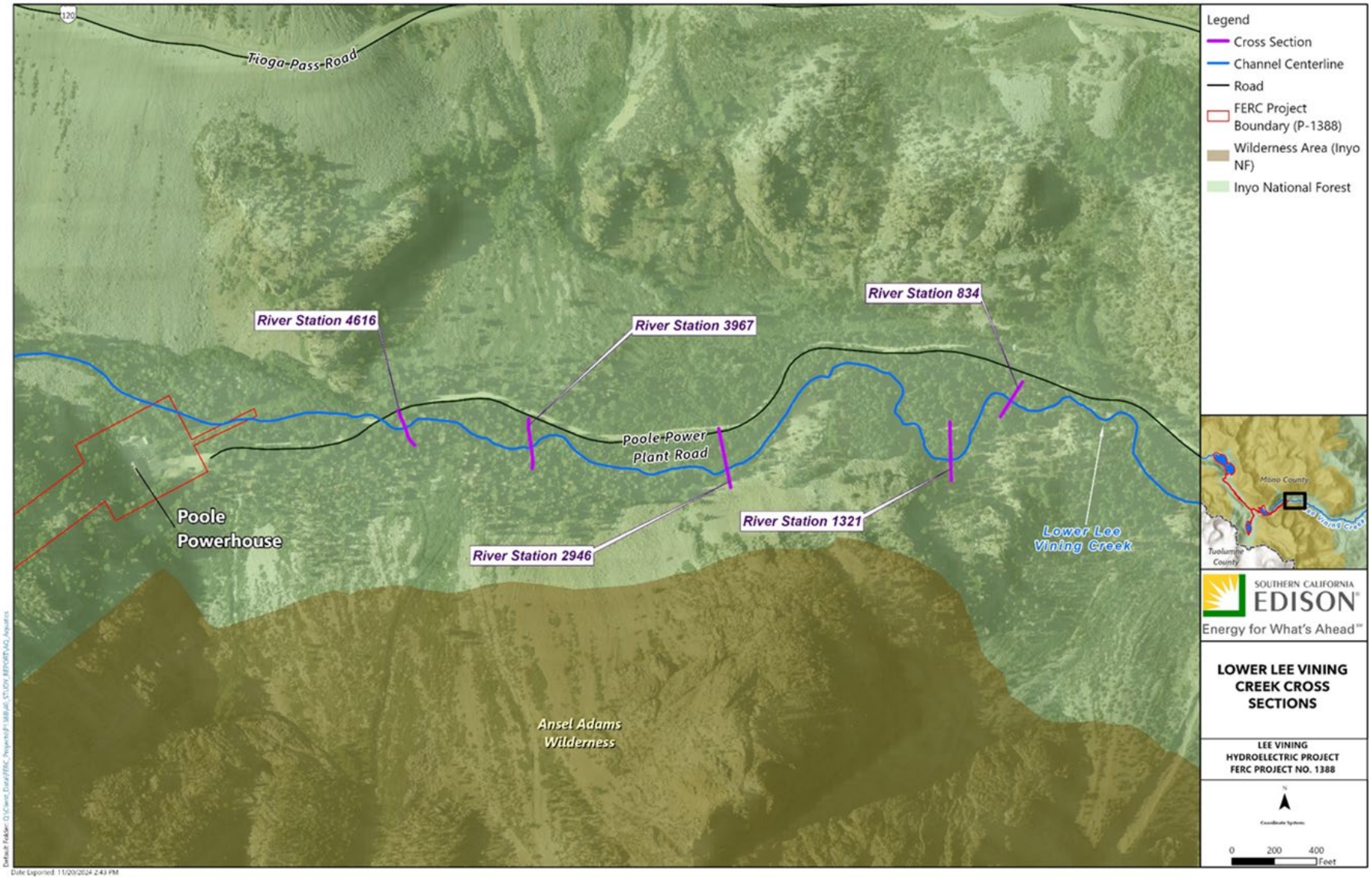

Figure 1 Selected Cross Sections on Lower Lee Vining Creek

4.0 UPDATED OPERATIONS

Kleinschmidt revised the instantaneous flow change assumption following conversations with the SCE generation team in October 2025. After reviewing minute-by-minute Supervisory Control and Data Acquisition (SCADA) megawatt (MW) data, it is clear that a change from approximately 0.5 to 11 MW (equivalent to a flow change of 10 to 110 cfs) occurs over a period of approximately 5 minutes, rather than being instantaneous. This is due to a lag between manual initiation of operations change and actual performance of the unit.

Similar to Table 2 above, Table 3 lists the time to change from 10 to 110 cfs under the instantaneous (~1-minute) change, and it further includes details for a 5-minute change. The range in times indicates the first instance of flow change in response to powerhouse operations to when the flow balances out at 110 cfs.

Table 3 Stage Change and Time to Change from 10 to 110 cfs for Under 1-minute and 5-minute Change Operational Schemes

Cross Section	Distance Downstream of Culvert on Power Plant Road (ft)	Instantaneous Change (~1 min)		Current Operations (~5 min)	
		Total Stage Change (ft)	Time Range* (min)	Total Stage Change (ft)	Time Range* (min)
4,616	128	1.68	<1-4	1.68	<1-10
3,967	777	0.96	<1-9	0.96	5-13
2,946	1,798	1.04	1-15	1.04	11-18
1,321	3,423	1.36	1-31	1.36	22-34
834	3,910	1.41	3-39	1.41	24-42

*Length of time it takes for the stage change to level out, as measured from initial change of 0.1 foot.

Furthermore, SCE plans to implement more automated operations at Poole Powerhouse through maintenance upgrades. While the current setup requires manual input to adjust powerhouse inflow, the automated setup will allow operators to automatically adjust operations more gradually to match California Independent System Operator Corporation (CAISO) demand and better meet grid supply needs. Based on these two operational considerations, Kleinschmidt modeled a 5-minute ramp-up together with a sample CAISO demand time series. The two flow scenarios are plotted in Figure 2 below.

To better characterize the system response to the CAISO operations, Kleinschmidt identified five inflection points at key flow changes on the hydrograph below. These inflection points are used to show times to change at each cross section in Table 4 below.

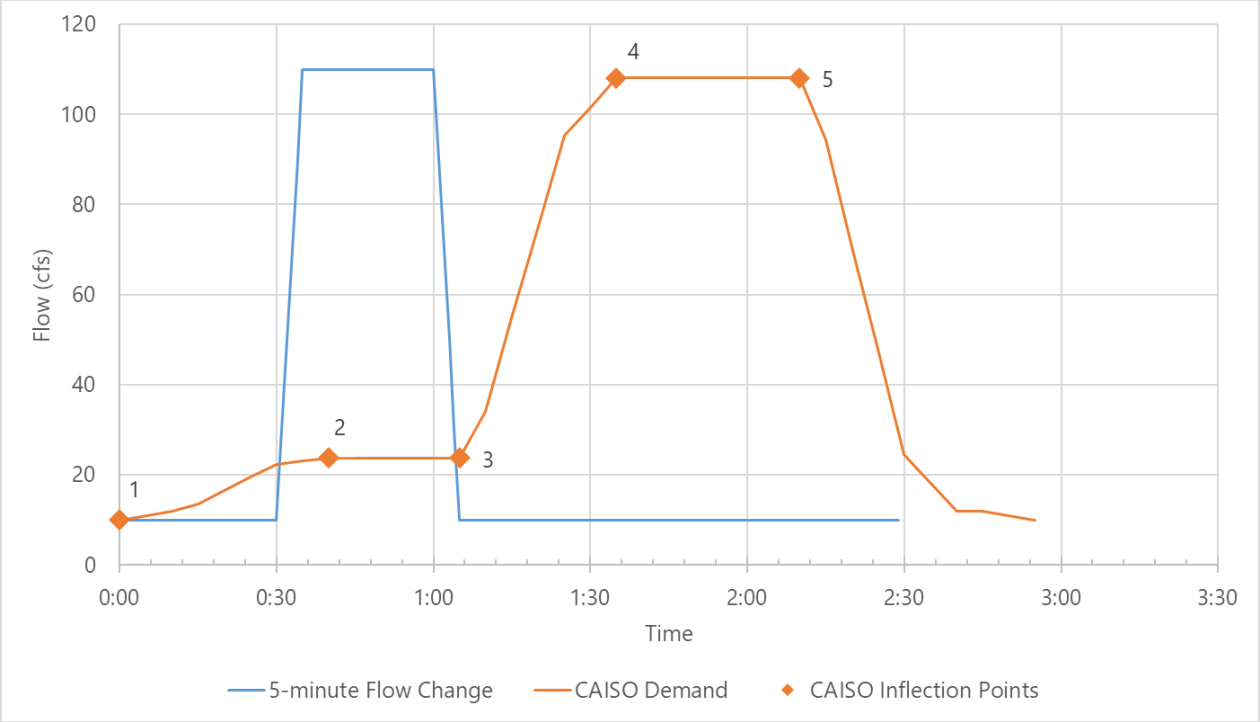

Figure 2 Additional Operations Scenarios

Table 4 below lists the response time at each cross section for each inflection point along the CAISO curve. The inflection points are shown in Figure 2 for reference.

Table 4 Response Time to Flow Changes from CAISO Curve

Cross Section	Time Between Inflection Points (min)*	
	1-2	3-4
At Unit	40	30
4616	40	32
3967	40	32
2946	43	32
1321	45	32
834	48	37

Table 5 lists the total stage change at each cross section for the two periods of rise in the CAISO hydrograph.

Table 5 Stage Change in Response to CAISO Operations Curve

Cross Section	Total Stage Change (ft) between Inflection Points	
	1 to 2	3 to 4
4616	0.4	1.26
3967	0.2	0.74
2946	0.31	0.73
1321	0.32	1.01
834	0.33	1.05

The results of velocity and depth at the five cross sections (Figure 2) for each flow were plotted on the Mosley (1983) curve to evaluate wading suitability at each cross section at various flows, shown in Figure 3 through Figure 6.

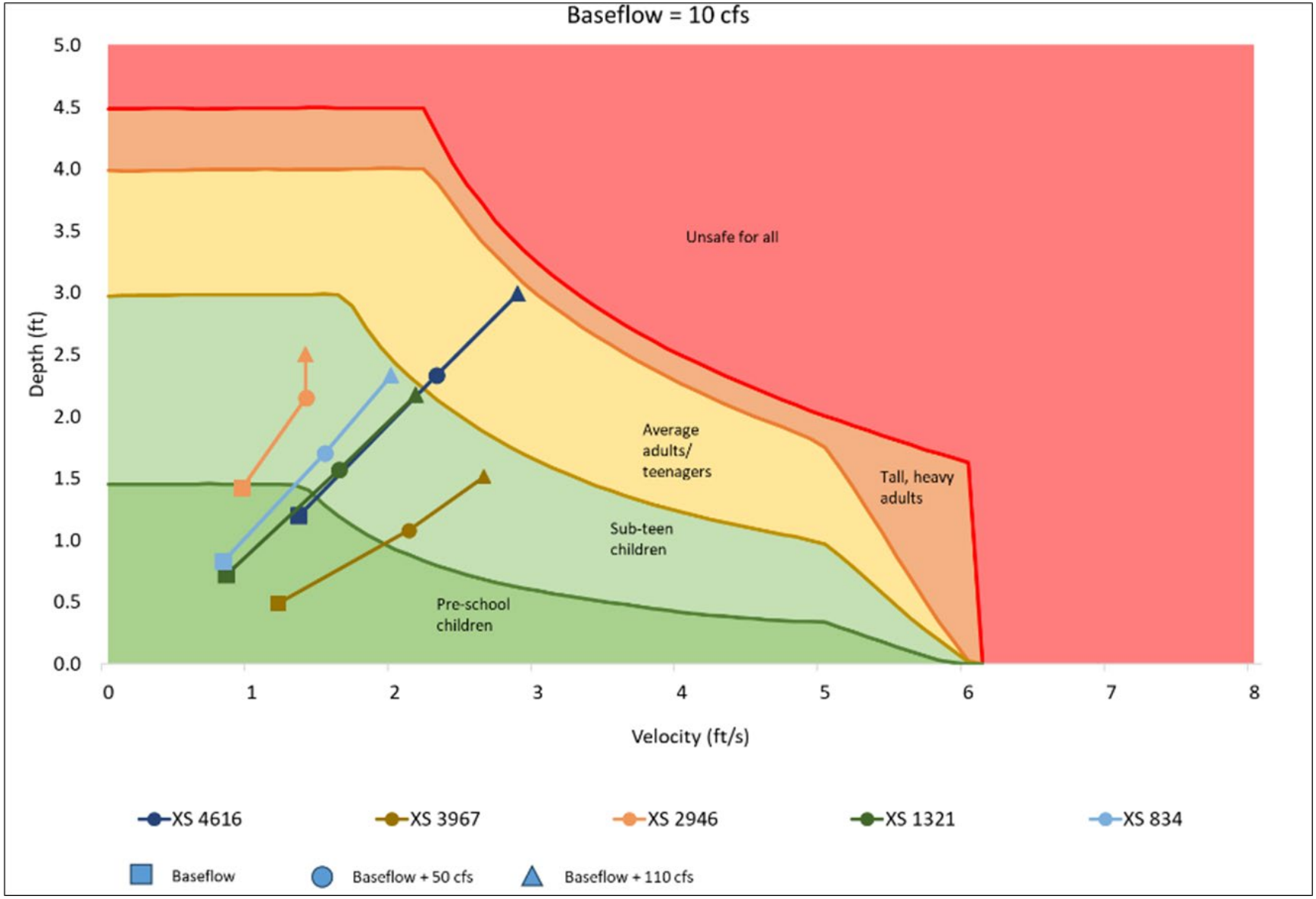

Figure 3 Wading Suitability in Lee Vining Creek at 10 cfs Baseflow and 0 cfs, 50 cfs, and 110 cfs Powerhouse Releases

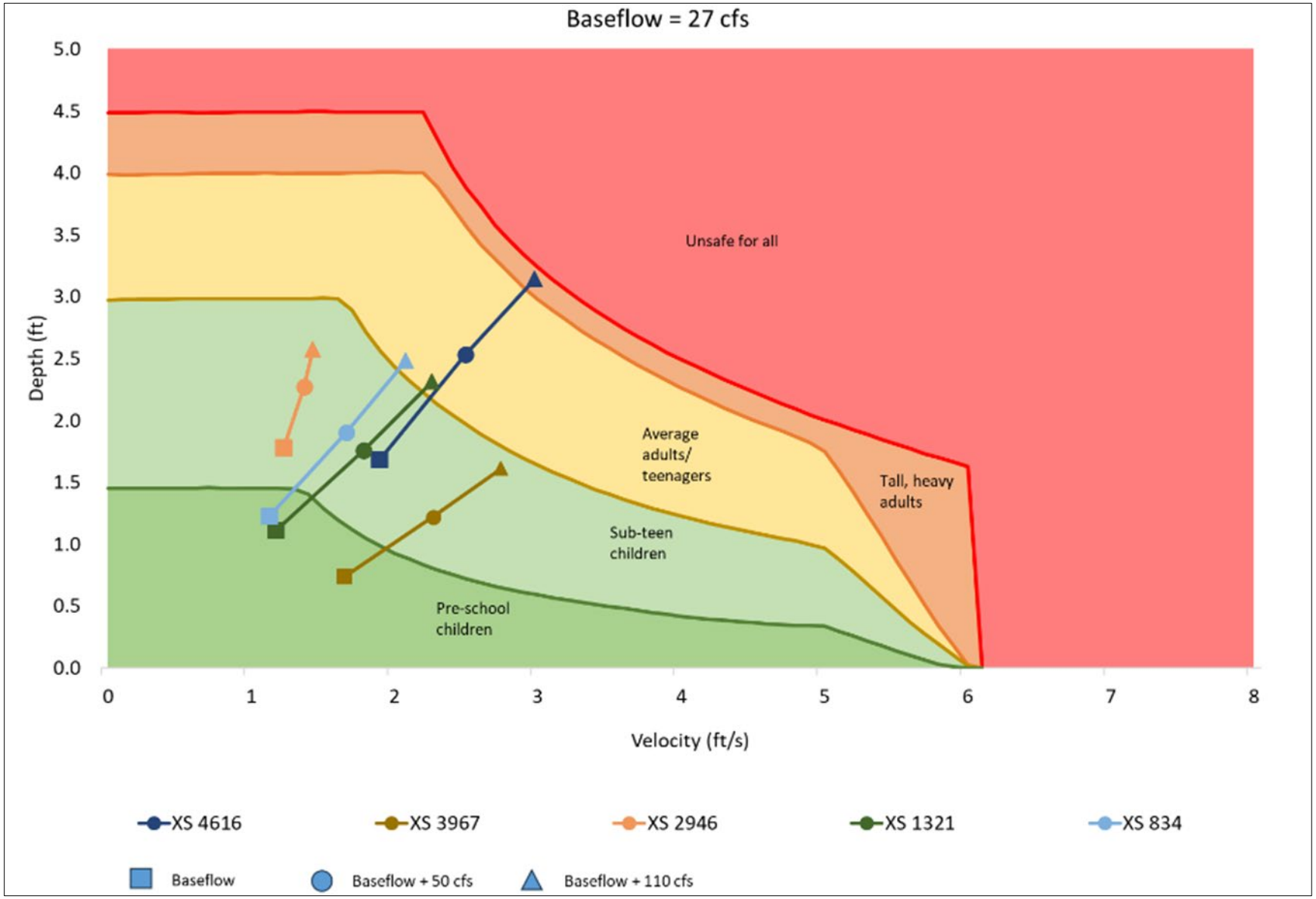

Figure 4 Wading Suitability in Lee Vining Creek at 27 cfs Baseflow and 0 cfs, 50 cfs, and 110 cfs Powerhouse Releases

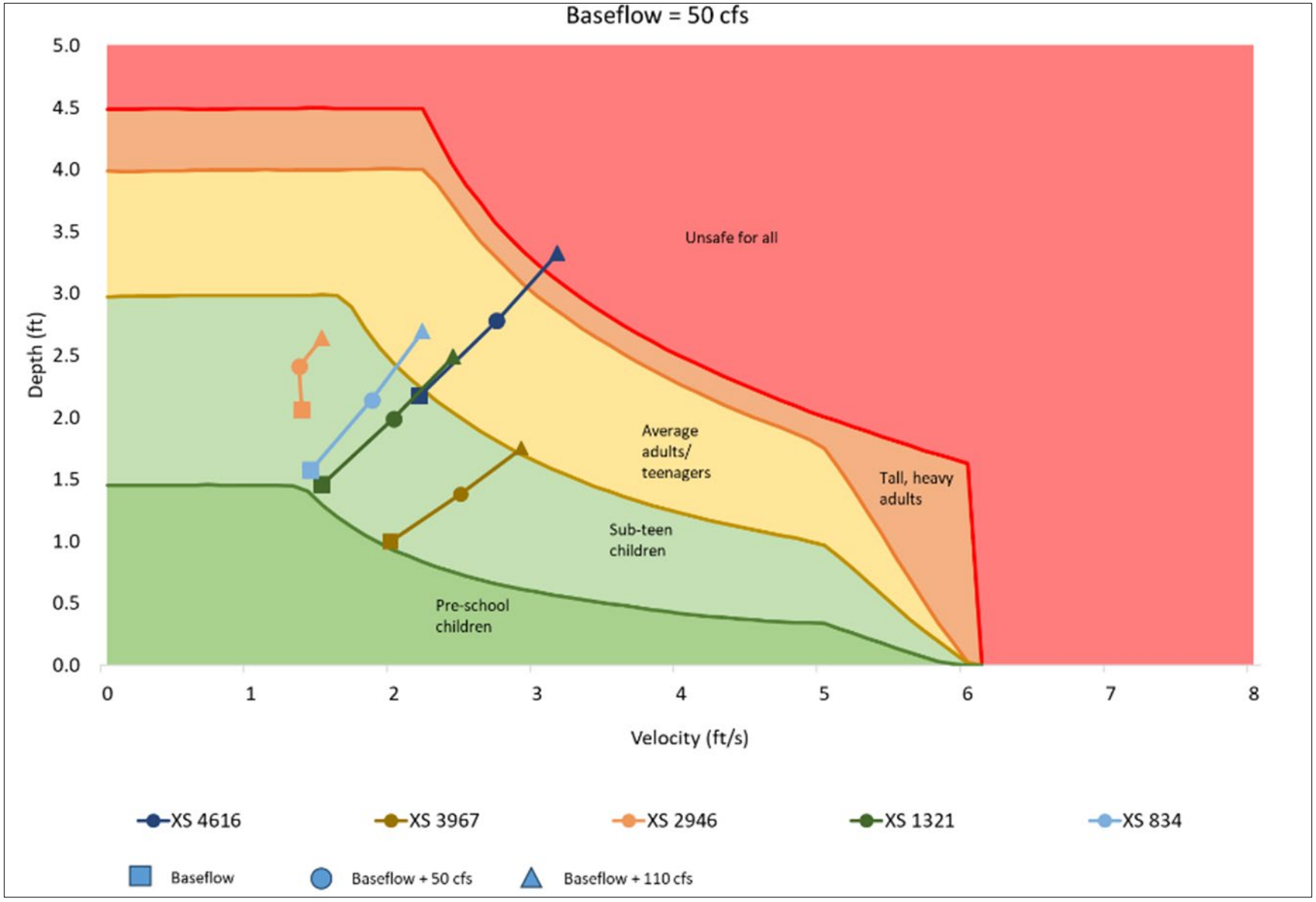

Figure 5 Wading Suitability in Lee Vining Creek at 50 cfs Baseflow and 0 cfs, 50 cfs, and 110 cfs Powerhouse Releases

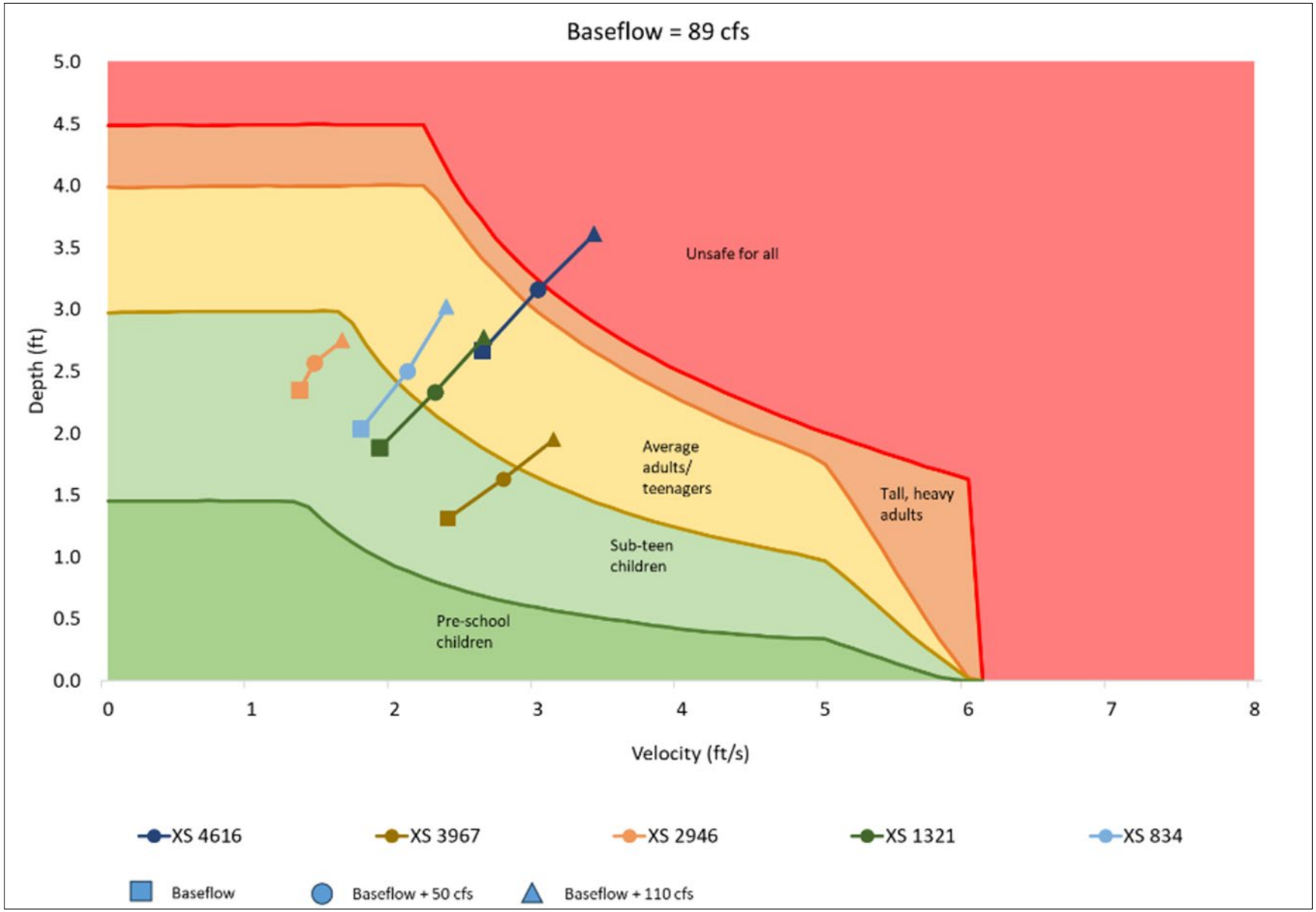

Figure 6 Wading Suitability in Lee Vining Creek at 89 cfs Baseflow and 0 cfs, 50 cfs, and 110 cfs Powerhouse Releases

In the above figures, for each cross section (shown as lines with varying markers and colors and with an "XS" in the legend), flows increase from the bottom left to the top right. The first marker in the bottom left represents the baseflow, the middle marker represents the baseflow plus 50 cfs, and the top right marker represents the baseflow plus 110 cfs.

The results in Figure 3 indicate that for a baseflow of 10 cfs, all the cross sections are safe for wading for all ages, including pre-school children. However, as the flows increase (Figure 4 through Figure 6), the wading suitability in most cross sections becomes unsuitable for pre-school children and is only appropriate for sub-teen children and beyond. For higher baseflows, the channel is unsuitable for pre-school children even without powerhouse operation, but the upstream-most cross section immediately below the Poole Powerhouse tailrace (XS 4616) may be unsuitable for all people with powerhouse operations. However, even at higher baseflows, the more downstream cross sections, nearer to the campgrounds, are suitable for average adults and teenagers during powerhouse operations. This indicates that hydro-resource optimization affects wading suitability more significantly closer to Poole Powerhouse and attenuates as it moves downstream.

In addition to the Mosely (1983) curve above, modeled depth and velocity data were also compared to the U.S. Geological Survey (USGS 1997) guidelines on safety in field activities. The USGS suggests that wading in a stream where the depth values multiplied by the velocity values equal or exceed 10 square feet per second (ft^2/s) is unsafe (USGS 1997). Although this is a recommendation for field work, it provides additional context for the values reported here. The maximum modeled depth multiplied by the velocity value in lower Lee Vining Creek is 7.8 ft^2/s at the upstream cross section for 105 cfs flow, less than the unsafe value identified by USGS. However, at 200 cfs, the upstream cross section shows a depth times velocity value of 12.3 ft^2/s, which does not meet the USGS safety criteria. Table 6 below shows the maximum depth multiplied by velocity values for each cross section.

Table 6 Depth * Velocity Values (ft^2/s) by Cross Section

Flow (cfs)	XS 4616	XS 3967	XS 2946	XS 1321	XS 834
27	3.2	1.2	2.3	1.3	1.4
40	4.2	1.7	2.8	1.8	1.9
50	4.2	1.7	2.8	1.8	1.9
60	5.4	2.3	3.3	2.6	2.6
70	6.0	2.6	3.5	3.0	3.0
80	6.5	2.9	3.6	3.3	3.3
90	7.1	3.1	3.7	3.6	3.7
105	7.9	3.6	4.0	4.2	4.2
150	10.0	4.8	4.5	5.7	5.6
200	12.3	6.1	5.1	7.4	7.2

However, it must be noted that the one-dimensional hydraulic model produces a depth- and cross section-averaged velocity. Localized velocities and depths across the cross sections may vary, potentially affecting the results presented in this analysis. Additionally, changes in operations, channel geomorphology, vegetation, or other factors may impact pedestrian safety in lower Lee Vining Creek.

Recreators in and adjacent to water bodies should always be cautious, particularly when they are downstream of a dam.

5.0 REFERENCES

Mosley, M. P. 1983. Flow requirements for recreation and wildlife in New Zealand rivers – A review. Journal of Hydrology (N.Z.) 22(2):152-174.

U.S. Geological Survey (USGS). 1997. National field manual for the collection of water-quality data, Chapter A9. Safety in Field Activities. USGS Techniques of Water-Resources Investigations, Book 9, Chapter A9. Available at: https://pubs.usgs.gov/publication/twri09.

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