

SOUTHERN CALIFORNIA EDISON LUNDY HYDROELECTRIC PROJECT (FERC PROJECT No. 1390)



DRAFT LICENSE APPLICATION VOLUME II



October 2026

SOUTHERN CALIFORNIA EDISON

Lundy Hydroelectric Project (FERC Project No. 1390)

Draft License Application Volume II

Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA 91770

October 2026

Support from:

Kleinschmidt

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RESOURCES MANAGEMENT PLAN

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DRAFT RESOURCES MANAGEMENT PLAN



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LIST OF ACRONYMS AND ABBREVIATIONS

A

APP Avian Protection Plan

B

BMP Best management practice

C

Cal-IPC California Invasive Plant Council

CDFW California Department of Fish and Wildlife

D

DLA Draft License Application

E

ESAP Endangered Species Alert Program

F

FERC Federal Energy Regulatory Commission

H

HFTD High Fire Threat District

L

Lundy Project Lundy Hydroelectric Project (FERC Project No. 1390)

M

MCRD Mill Creek Return Ditch

O

O&M Operations and maintenance

P

PME Protection, mitigation, and enhancement

Project Lundy Hydroelectric Project (FERC Project No. 1390)

R

RMP Resources Management Plan

S

SCE Southern California Edison [Company]

U

USFS U.S. Forest Service

USFWS U.S. Fish and Wildlife Service

1.0 INTRODUCTION

Southern California Edison (SCE) has prepared this Resources Management Plan (RMP) to accompany SCE's application for a new Federal Energy Regulatory Commission (FERC) license for the Lundy Hydroelectric Project (Lundy Project or Project; FERC Project No. 1390).

Combining resource areas under one RMP will enable SCE to more comprehensively train staff and successfully implement protection, mitigation, and enhancement (PME) measures. This plan also describes routine operations and maintenance (O&M) activities that occur within the FERC Project Boundary.

The RMP will guide SCE management and stewardship activities as outlined in this document. Specifically, the following activities are governed by this RMP:

- Routine O&M activities
- Implementation of SCE company-wide management and protection plans
- Monitoring of invasive plants

Additionally, a Historic Properties Management Plan, Recreation Resources Management Plan, and Water Management Plan are being prepared as part of the relicensing for the Project and will be filed with FERC as standalone documents.

2.0 PROJECT OPERATIONS

SCE provides the following high-level overview of Project operations for background and informational purposes only. A more detailed description of Project facilities operations is included in Exhibit A, filed in Volume I of the Draft License Application (DLA). The Project consists of Lundy Dam and Lundy Lake, a flowline consisting of a pipeline and penstock, a powerhouse, and the Mill Creek Return Ditch (MCRD).

The Project is operated in compliance with existing regulatory requirements, agreements, and water rights to generate power. Sections 2.1 *Water Management* and 2.2 *Inspections and Maintenance* describe how the Project manages water in compliance with its FERC license and water delivery agreements to support its operations, and how inspections and maintenance of Project facilities are carried out. Project operations are described in further detail in Exhibit A of the DLA.

2.1. WATER MANAGEMENT

Water management at the Lundy Hydroelectric Project is governed by a combination of adjudicated Mill Creek water rights and FERC license requirements. Project operations are designed to balance hydropower generation, water rights deliveries, aquatic resource protection, and compliance with applicable regulatory requirements.

The Project utilizes Lundy Lake to store runoff and regulate releases to Mill Creek while satisfying downstream water rights obligations. SCE operates the Project in accordance with the Mill Creek water rights adjudication, which establishes a priority system for the allocation and delivery of water to downstream users. To support these obligations, SCE developed an Annual Operations Plan and utilizes the Mill Creek Accounting and Planning Tool, which incorporates hydrologic forecasts, observed runoff conditions, and water rights priorities to guide reservoir operations and water deliveries.

Water released from Lundy Lake is managed through a system of Project and non-Project conveyance facilities that distribute water to downstream water rights holders while also supporting hydropower generation. Operational decisions concerning reservoir storage, water deliveries, powerhouse generation, and flow releases are coordinated to maintain compliance with water rights obligations and settlement commitments.

In addition to water rights deliveries, Project operations incorporate minimum flow requirements and controlled release procedures intended to maintain aquatic habitat conditions and minimize potential effects associated with rapid changes in streamflow. Controlled release provisions establish limits on the rate at which flows may be increased or decreased from Lundy Dam, while minimum flow requirements ensure continuous flow below the dam under a range of hydrologic conditions. These requirements are implemented consistent with the Streamflow Gaging Plan.

2.2. ROUTINE INSPECTIONS AND MAINTENANCE

Routine inspections and maintenance activities are conducted at Project facilities to verify the structural and/or functional integrity of the facilities, identify conditions that might

disrupt operations or threaten public safety, and maintain the facilities in safe and operational conditions (Table 1). These activities are further described below.

Routine inspections are conducted by an operator 4 to 5 days per week. Monthly spill prevention, control, and countermeasure inspections, as well as switchyard inspections, also occur. During spring and summer peak runoff conditions, inspections occur daily; weekly and monthly inspections occur outside of peak runoff, while hydrographers perform weekly inspections of Lundy Dam in summer months. Monthly inspections occur at Lundy Dam year-round; however, there is limited visibility in winter months.

Routine O&M activities include minor road and trail maintenance; power and communication line maintenance; maintenance outages; powerhouse inspections and maintenance; and flowline inspections and maintenance. Maintenance work is conducted as needed throughout the year. Trash rack grids are raked to ensure they are clean and free of debris. Minor concrete repairs and spalling are addressed as needed. Other normal maintenance includes snow removal and emergency repairs to the generator and associated equipment.

Table 1. Routine Project Inspection and Maintenance Activities

Maintenance Activity	Relevant Project Area	Frequency	Description
Maintenance of dirt/native roads and parking areas, including ditch and culvert maintenance	All native Project roads and parking areas (e.g., Flowline Access Road off from Lundy Lake Road) <i>Recreation Access at Dam*</i> <i>Parking areas at boater put-in/take-outs</i>	Annually, and as needed	Minor Project road maintenance: Grading approximately within the road prism Debris removal and basic repairs, including filling of pothole Maintenance of erosion control features such as drains, ditches, and water bars Repair, replacement, or installation of access control structures such as posts, cables, and barrier rock Cleaning and clearing debris and sediment from culverts with a backhoe or hand shovel Repair and replacement of signage Vegetation management may be conducted concurrently with road maintenance on an as-needed basis Major Project road maintenance: Placement or replacement of culverts and other drainage features
Vegetation trimming and removal/clearing	All Project roads Project facilities: powerhouse, dams, water conveyance system, penstock, and stream gage sites <i>Project Recreation Facilities, including camping and day use</i>	Every other year Mono County as needed	Brush mow along the roadway to maintain the road as necessary for a safe line of sight and passage Trimming performed both manually and with tools/equipment (i.e., weed whacker or chainsaw) Maintain access and horizontal clearances
Hazard tree inspection and removal	All Project roads Project facilities: powerhouse, dams, water conveyance system, penstock, and stream gage sites <i>Recreation sites and day-use areas</i>	Weekly and monthly inspections Removal as needed	Remove hazardous brush and trees threatening roads, vehicles, and Project infrastructure. Removal performed both manually and with tools/equipment

Slide debris removal	All Project roads	As needed, typically following winter rains	Remove slide debris with grader, loader, and dump truck Spread material on road near debris slide as road base
Herbicide spraying	<i>Recreation and day-use facilities</i>	Annually	Pre-emergent herbicide spraying followed by post-emergent, as necessary, on private land only If necessary, weed-whack within flat areas prior to spraying, on private land only
Structural inspection and maintenance	Powerhouse Lundy Dam Penstock Water conveyance system	Weekly and monthly inspections Daily during spring/summer in peak runoff conditions Maintenance work as needed	Rake trash rack grids to ensure they are clean and free of debris Address minor concrete repairs/spalling MCRD repairs including but not limited to; Concrete repairs Excavations Recompacting soil
Material/slash burning	Varies, depending upon source material location	Annually, or as needed	Obtain permit from the U.S. Forest Service when needed Burn brush, slash, or other vegetation accumulated from various Project operations
Manage access gates and security fencing	Vicinity of powerhouse Selected locations around access points at open flumes	Inspect weekly and monthly during other facility inspections	Repair as needed
Sediment management (physical removal)	Intake areas Splitter box and other ditches necessary for water deliveries	As needed	Hand shovels or backhoe used to remove sediment, if needed
Facility painting	Powerhouse, handrails, maintenance buildings Penstock	Annually maintain, as needed (facilities on a rotation of every 10–20 years)	Follow general aesthetic guidelines (e.g., painting in earth tones, landscaping with vegetation similar to surrounding areas)

*Italicized text indicates activities that were implemented by Mono County under its license agreement with SCE.

2.2.1. FACILITIES REPAIR

SCE routinely makes repairs to structures and facilities and conducts maintenance to retain the functional and structural integrity of the Project facilities. Facilities include gaging stations and flumes, intakes and diversion structures, and flow meters. Within these facilities, maintenance and repairs may occur on gates, barricades, small structures (e.g., gaging stations and storage facilities), streambanks, and diversions. Major categories of facilities include the following:

- Measuring stations and flumes: SCE uses measuring stations and flumes to measure water in the waterways. Maintenance work related to gaging stations and flumes includes mowing vegetation to provide access along channel banks and removing stream deposits within an area of measuring stations to allow unobstructed water flow and the accurate reading of water flow in waterways.
- Intake and diversion structures: SCE uses intake and diversion structures to divert water from a stream or canal. Stream deposits (accumulated sediment and woody debris) are removed above and/or below intake structures, as needed.
- Gate inspection and maintenance: This may include the operation of intake drain gates, sand traps, and chamber drain gates. These routine operations do not result in the draining of any ponds, which minimizes effects to the stream. SCE is required to inspect penstocks, which does involve lowering the ponds to expose the entry point to the penstock.

2.2.2. MAINTENANCE OUTAGE

SCE conducts annual maintenance outages at the Lundy Powerhouse to support minor maintenance and repair any wear and tear, typically during low-flow periods (fall). The maintenance outage typically lasts for 1 to 3 weeks. During the outage, SCE conducts mechanical and electrical inspections and maintenance of powerhouse appurtenances. In conjunction with the maintenance outage, SCE also makes minor repairs (e.g., trash rack grid raking, spillway debris removal, concrete spalling/repairs, handrail repairs) to the dam, as appropriate.

SCE conducts physical inspections of the flowline/penstock every quarter.

2.2.3. DISTRIBUTION, POWER, AND COMMUNICATION LINE MAINTENANCE

The Project includes a 15-foot section of transmission line to the point of interconnection at the non-Project switchyard immediately adjacent to the Lundy Powerhouse. This short connection is maintained by Project personnel.

3.0 NON-PROJECT CORPORATE-WIDE PLANS

The following are non-Project, SCE management plans that will continue to be implemented during the new license, in conjunction with the RMP. These existing plans are corporate-wide, non-Project plans that outline general internal processes and procedures, providing direction to SCE staff when working across all SCE-owned facilities. For these reasons, they are not considered part of the FERC license, but rather are described below to indicate, for informational purposes only, how these plans are implemented for this Project.

3.1. WILDFIRE MITIGATION PLAN

SCE has an existing and recently updated Wildfire Mitigation Plan (SCE, 2022). The plan outlines methods to reduce the risk of wildfire that may be caused by utility actions or equipment and to minimize consequences of wildfire by managing vegetation and other potential fuel sources. The Wildfire Mitigation Plan includes an actionable, measurable, and adaptive plan to reduce the risk of potential ignitions associated with SCE's electrical infrastructure in high fire risk areas by increasing system hardening, bolstering situational awareness, and enhancing operational practices. While the Wildfire Mitigation Plan is considered confidential because of the sensitive facility information, it is available for review by resource agencies at their request. The key provisions are listed below:

- Risk assessment and mapping
- Situational awareness
- Grid design and system hardening
- Asset management and inspections
- Vegetation management and inspections
- Grid operations and protocols
- Data governance
- Resource allocation methodology
- Emergency planning and preparedness
- Stakeholder cooperation and community engagement
- Agency consultation

SCE conducts additional vegetation inspections and maintenance in High Fire Threat Districts (HFTDs) as part of the Wildfire Mitigation Plan (SCE, 2022). Sites located in the HFTD are inspected on an annual basis, and many sites have an expanded clearance; expanded clearances in HFTDs for high voltage facilities have a 100-foot clearance, and

low voltage sites have a 30-foot clearance to reduce wildfire ignition risks. To maintain the expanded clearances, vegetation maintenance is done annually on a regularly scheduled rotation.

SCE maintains rights-of-way to approximately 10 feet on either side of Project flowlines, penstocks, Project roads, and Project structures to prevent buildup of woody growth and dead debris that could contribute to wildfire risks.

3.2. AVIAN PROTECTION PLAN

SCE developed the Avian Protection Plan (APP) as company-wide guidance for the protection of avian species at SCE-owned facilities (SCE, 2019). The APP is implemented for the Project in accordance with primary federal laws protecting birds, the Bald and Golden Eagle Protection Act, the federal Endangered Species Act, and the Migratory Bird Treaty Act. Within the plan, there are established roles for various SCE personnel to follow state and federal laws as they relate to the protection of bird species within the FERC Project Boundary. The primary procedures discussed in this document include permitting, avian mortality notification and prevention, proactive retrofits, bird nest removal, injured bird discovery, and ground-disturbing activities. As this plan is adapted to meet the needs of each specific activity and is implemented in accordance with other best management practices (BMPs) and appropriate consultation activities, a plan specific to the Project is not necessary.

3.3. NESTING BIRD MANAGEMENT GUIDANCE FOR SMALL PROJECTS

SCE's Nesting Bird Management Guidance for Small Projects was approved in April 2016 as a company-wide plan to provide guidance to staff when working at SCE-owned facilities. This plan is implemented as needed at the Project to prevent take of active nests, eggs, nestlings, or nesting birds as a result of construction activities. SCE defines management of nesting birds as "avoiding or minimizing project activities that have the potential to cause active nest failures as well as to minimize or avoid construction delays" (SCE, 2016). For each activity, SCE's avian biologist defines a buffer around existing nests at the Project site(s) based on guidelines provided in the guidance document. Pre-activity nesting bird surveys are conducted during the recognized nesting season and adjusted for altitude across the FERC Project Boundary. As this guidance document was developed to meet the needs of each specific activity and implemented in accordance with other best management practices (BMPs) and appropriate consultation activities across all SCE facilities statewide, a plan specific to the Project is not necessary.

3.4. VEGETATION MANAGEMENT PROGRAM GUIDES

SCE has two main corporate-wide documents that guide vegetation management at any SCE-owned site: the *Vegetation Management Operations Manual* (SCE, 2017a) and the *SCE VM-3 Program Guide WMP: VM-3 Expanded Clearances for Legacy Facilities* (Vegetation Management Activity of the Wildfire Mitigation Plan) (SCE, 2021). The *Vegetation Management Operations Manual* is guidance primarily for keeping trees clear of transmission lines. The Vegetation Management Activity of the Wildfire Mitigation Plan

outlines other procedures for keeping hydropower facilities clear of vegetation and reducing the risk of wildfire.

Along buried pipelines, SCE focuses on removing or preventing tree growth where roots could intrude on the pipelines and diminish their integrity. Routine maintenance around access locations such as hatches or maintenance holes involves clearing the area free of vegetation out to 10 feet. SCE monitors vegetation growth on a yearly basis and treats as needed. However, conveyance systems/pipelines are scheduled for routine clearing on a 3-year rotation, with a decadal cycle for larger tree and wood-debris removal.

As the vegetation management program is adapted to meet the needs of each specific activity and implemented in accordance with other BMPs and appropriate consultation activities across all SCE facilities statewide, a plan specific to the Project is not necessary.

3.5. ENDANGERED SPECIES ALERT PROGRAM

The Endangered Species Alert Program (ESAP; SCE, 2005) was developed to provide SCE personnel with a means to identify when they may be working within an area with the potential occurrence of legally protected plant and animal species in the SCE service territory. For each of these species within the SCE service territory, the ESAP Manual includes a photograph, description, natural history information, and map showing the species' distribution in relation to SCE facilities. Should a proposed activity have potential to adversely affect a known special-status species population, SCE's Environmental Department staff will be notified to evaluate the situation and, if needed, participate in consultation with the relevant regulatory agencies.

3.6. INVASIVE MUSSEL PREVENTION PLAN

SCE implemented the Invasive Mussel Prevention Plan in July 2017, which outlines the prevention of introduction and spread of invasive quagga mussel (*Dreissena rostriformis bugensis*) and zebra mussel (*Dreissena polymorpha*) into Project lakes. Quagga and zebra mussels have rapidly spread throughout the United States; once established, these mussels have the potential to result in physical damage to intake pipes and similar hard surfaces that would compromise the Project's infrastructure. Establishment of mussel species is most often the direct result of transportation via boats or vessels. Most Project lakes are open to the public for recreation, so transportation of these species is possible. Lakes operated by SCE are hydrologically connected and susceptible to sequential infestation (SCE, 2017b).

SCE conducted a company-wide vulnerability assessment of its lakes in 2009-2010 to evaluate susceptibility to invasive quagga and zebra mussel establishment. The assessment concluded that all Project lakes were at low risk for invasion and informed development of SCE's Invasive Mussel Prevention Plan (SCE, 2017b). SCE continues to provide public education and outreach through signs, kiosks, and brochures regarding invasive mussel prevention and the potential economic impacts associated with mussel infestations (SCE, 2017b). In 2024, golden mussel (*Limnoperna fortunei*) was first detected in North America in California (CDFW, 2026; CFGC, 2024). Golden mussel is

similar to quagga and zebra mussels in its potential to attach to hard surfaces, foul infrastructure, and affect water conveyance and hydropower facilities; however, it may tolerate a broader range of environmental conditions (CDFW, 2026; CFGC, 2024). In response to this emerging invasive species concern, California is revising its invasive mussel regulations and statutes to address golden mussel and other invasive mussel species more broadly (CDFW, 2026; CFGC, 2024).

SCE will revise its Invasive Mussel Prevention Plan, as appropriate, to address golden mussel prevention, inspection, decontamination, reporting, and response measures consistent with applicable state requirements. The revised plan will be implemented at the Project, as applicable. Because the corporate plan applies across SCE-owned facilities statewide and provides the framework for invasive mussel prevention and response, a separate Project-specific invasive mussel prevention plan is not necessary.

3.7. HAZARDOUS SUBSTANCES PLAN

The Project follows the Plan for Oil and Hazardous Waste Storage and Spill Prevention and Cleanup. The plan requires SCE to (1) maintain a cache of spill cleanup equipment suitable in the FERC Project Boundary for any spill from a project; (2) periodically inform the U.S. Forest Service (USFS) of the location of the spill cleanup equipment on USFS lands and of the location, type, and quantity of oil and hazardous substances stored in the project area; and (3) inform the USFS immediately of the nature, time, date, location, and action taken for any spill. Additionally, the plan describes approximate quantities of hazardous materials stored within the FERC Project Boundary, storage procedures, spill prevention measures, and cleanup measures.

4.0 PROJECT-SPECIFIC MANAGEMENT PLANS AND MEASURES

The following are SCE's proposed Project-specific plans or measures, developed as part of the Project relicensing, which will be implemented, when appropriate, as part of routine O&M activities at the Project described in Section 2.2.

4.1. PIPELINE MONITORING PLAN

Patrol and inspection of the Lundy Project pipeline and penstock will be performed on a quarterly basis, on or before March 31, June 30, September 30, and December 31 of each year. These quarterly patrols and inspections shall begin after FERC issues a new license and continue throughout the life of the license, including any extensions thereof. Additionally, a patrol and inspection shall also be done after any surges or unexpected flow reductions have occurred in the penstock or pipeline, and a patrol and inspection will be performed after a seismic event of 5.0 magnitude (M5), or greater, centered within 50 miles of the penstock and pipeline.

In the event of rupture of the Lundy Project pipeline or penstock, measures shall be taken immediately to close the upper penstock valve (located at Lundy Dam) and then drain the pipeline or penstock through the powerhouse and/or other ancillary drain valves.

Depending on the severity of damage to the pipe or penstock, a temporary repair may be made following informal communication with FERC, USFS, and the California Department of Fish and Wildlife (CDFW).

As soon as practicable following the incident, SCE will provide a plan for permanent remedy of the ruptured pipeline or penstock and repair of damage to property. This plan will first be submitted to the following agencies: USFS, Bureau of Land Management (if affected), and CDFW. Each of these agencies will be given 30 days to review and comment in writing to SCE concerning the proposed remedy. At the end of the 30-day period, SCE will file the plan for remedy, including specific descriptions of how the plan accommodates the comments and recommendations of the agencies, to FERC for approval. This filing will include copies of all documentation from the agencies and comments and recommendations that they have offered. In the event SCE does not adopt a recommendation, the filing shall include SCE's reasons based on Project-specific information.

4.2. BOTANICAL AND WILDLIFE RESOURCES

Routine Project O&M includes numerous activities to ensure the safe operation of the Project. Botanical and wildlife resource surveys were conducted as part of the relicensing; based on the data collected during relicensing surveys, no adverse effects to botanical or wildlife resources, including special-status species, within the FERC Project Boundary were identified as a result of routine O&M activities.

The below sections identify routine O&M activities associated with the Project that may pertain to botanical or wildlife resources. These activities typically occur within previously

disturbed areas or in areas that are regularly maintained and cleared of vegetation surrounding the Project facilities.

4.2.1. MEASURES TO PROTECT BOTANICAL RESOURCES

The goals and objectives of this section include the following:

- Provide a clear operational decision-making process related to botanical resources when planning and/or implementing routine O&M activities.
- During routine O&M activities, prevent disturbance or effects to federally and state-listed rare, threatened, or endangered species; USFS Species of Conservation Concern; species with a California Rare Plant Rank designation of 1 or 2; or other special-status plant species.
- During routine O&M activities, reduce spread of existing populations and introduction of non-native invasive species through the use of BMPs.

4.2.1.1. Special-Status Plants and Sensitive Natural Communities

GENERAL AVOIDANCE MEASURES

During routine O&M activities, where special-status species and sensitive natural communities exist, avoidance of those species will be employed wherever possible. Measures to facilitate avoidance may include, but are not restricted to, the following:

- Demarcation of the maximum extent of the special-status resource(s) to be avoided: This may include flagging of individual resources or installation of a temporary barrier (e.g., roping off areas to be avoided; installation of silt fencing, straw wattles, or gravel/sandbags if soil disturbance is anticipated) to prevent effects to the species.
- Retention of a biological monitor during ground-disturbing or vegetation removal activities so that special-status resources are avoided: SCE, its biologist, and appropriate agencies will jointly determine the need for monitoring. Any effects to federally or state-listed species will be reported to USFS, the U.S. Fish and Wildlife Service (USFWS), FERC (as appropriate), and CDFW within 24 hours.

MITIGATION FOR UNAVOIDABLE EFFECTS

If effects of a routine O&M activity to special-status plant species or sensitive natural communities cannot be avoided, effects will be minimized to the extent possible. Mitigation of effects may be required depending on the status and size of the affected population.

Measures to mitigate for unavoidable effects may include, but are not restricted to, the following:

- Collection of plant material (e.g., seeds, corms, bulbs, whole plants) for distribution and revegetation after the activity is completed
- Translocation of special-status plants

Implementation of the appropriate mitigation measures will be managed by SCE's Environmental Manager. If deemed necessary, a plan will be developed and submitted to USFS and/or CDFW (as appropriate) for review and approval prior to implementation.

4.2.1.2. Invasive Plants

Implementation of BMPs that reduce invasive plant introduction and spread can help reduce future maintenance needs and costs; reduce fire hazards; reduce herbicide use; enhance access and safety; limit liability for the governing agency or lessee; maintain good public relations; and protect existing wildlife habitat, native plant populations, beneficial insects, as well as threatened and endangered species (Cal-IPC, 2012).

For non-routine O&M activities that could introduce a new species or cause an existing species to propagate, SCE will consult with the Inyo National Forest to determine the appropriate measures to be implemented with respect to control of invasive plants.

BEST MANAGEMENT PRACTICES

Appropriate BMPs will depend on the type of work activity; location of the work (e.g., existing disturbed area, naturally vegetated area); timing of the work; invasive plant species identified; and treatment method required. The following general BMPs are recommended to avoid/minimize the spread of invasive plant species when conducting routine O&M activities:

- Where feasible, do not stage equipment, materials, or crews in invasive plant-infested areas.
- Where feasible, invasive plant infestations will be designated as control areas (i.e., areas where equipment, traffic, and soil-disturbing activities will be excluded). If control areas are designated, they will be identified on Project maps and delineated in the field with flagging.
- All equipment and vehicles used for ground-disturbing activities will be free of invasive plant material before entering the FERC Project Boundary. Equipment will be considered clean when visual inspection does not reveal soil, seeds, plant material, or other such debris. Cleaning will occur at a vehicle washing station or steam cleaning facility before the equipment and vehicles enter the FERC Project Boundary.
- When working in areas of known invasive plant infestations within the FERC Project Boundary, equipment will be cleaned before moving to other work sites to prevent the spread of invasive plant species from an infested to potentially non-infested area. Prior to accessing sites free of non-native invasive plants, SCE personnel will clean footwear of soil and seeds and disinfect soles with bleach. In instances where SCE

staff members have been working in an area with infestation and the intent is to move to an area that is infestation free, SCE staff members are trained annually to clean the equipment before use in the new area (FERC-required annual training). Depending on the circumstances, the equipment is either moved via trailer to an off-site location and cleaned, or is cleaned on site (before moving), as appropriate. Infested areas will be identified on Project maps.

- If erosion control measures are used (e.g., hay bales, straw wattles), they will be certified weed-free. If certified weed-free materials are not available, weed-free rice straw or non-vegetated material (e.g., sand or gravel bags) will be substituted.

4.2.1.3. Trimming and Mowing Along Roads and Around Project Facilities

As part of routine O&M at the Project, vegetation trimming and removal/clearing is performed as needed at all Project facilities, including Lundy Powerhouse, Lundy Dam, penstock, and stream gages for safety purposes and to prevent overgrowth of vegetation that interferes with the flow of water and the measurement of flow through the gaging stations. SCE staff brush mow using a flail-type mower along roadways to maintain roads as necessary for safe line of sight and passage, as well as wildfire mitigation. Trimming is performed both manually and with tools/equipment (i.e., string trimmer or chainsaw). Herbicides are only used in the Inyo National Forest with USFS approval under specific conditions, and consistent with the *Forest-wide Invasive Plants Treatment Project Environmental Assessment* (USFS, 2019).

4.2.1.4. Hazard Tree Removal

Hazard tree¹ inspection and removal are performed as needed at Project facilities as part of routine O&M activities. SCE staff remove hazard brush and trees deemed a threat to road or vehicles traveling them, or near Project infrastructure. Removal occurs as needed and is performed both manually and with tools/equipment.

4.2.2. MEASURES TO PROTECT WILDLIFE RESOURCES

The goals and objectives of this section include the following:

- Provide a clear operational decision-making process related to special-status wildlife resources when planning and/or implementing routine O&M activities.
- During routine O&M activities, prevent disturbance or adverse effect on special-status wildlife species including federally and state-listed endangered and threatened

¹ Hazard trees include dead, decadent, or rotten trees; forked trees; trees weakened by decay or disease; trees susceptible to wind-throw; and trees that are leaning toward the conductors or have large branches that may fall on the lines or facilities. Hazard trees will be felled and left as is, just as they would have been if nature had allowed them to fall. The maximum stump height of any tree felled will be 12 inches measured from the uphill side of the stump. No removal of wood is authorized for any SCE or contractor employee for personal use or gain.

species, USFS At-Risk Species and Species of Conservation Concern, California Species of Special Concern, and nesting birds and raptors.

4.2.2.1. Special-Status Wildlife

PME measures for special-status wildlife during routine O&M activities are described below. These measures are intended to protect resources in the FERC Project Boundary and are not indicative of an identified Project effect.

GENERAL AVOIDANCE MEASURES

During routine O&M activities, effects to special-status species will be avoided wherever possible. During the annual planning process, the SCE Environmental Manager will review the planned routine O&M locations and determine if there is the potential for special-status wildlife to occur. If the SCE Environmental Manager determines that any planned routine O&M location has the potential to support a special-status wildlife species, field surveys will be conducted as early as possible in the planning process to allow modifications to routine O&M activities, where feasible, to avoid or reduce a potential effect.

BIGHORN SHEEP

Bighorn sheep (*Ovis canadensis*) freely roam throughout the vicinity of the FERC Project Boundary without interference from the Project. No special measures are needed to protect bighorn sheep with respect to routine O&M activities.

GREATER SAGE-GROUSE

Greater sage-grouse (*Centrocercus urophasianus*) may occur in the vicinity of the FERC Project Boundary without interference from the Project. No special measures are needed to protect greater sage-grouse with respect to routine O&M activities.

5.0 CONSULTATION AND PLAN REVIEW

5.1. PRE-LICENSE CONSULTATION

This RMP is being developed during the relicensing process and filed with the DLA as indicated below.

- October 1, 2026: RMP filed as part of the Project DLA
- October 1, 2026, through December 30, 2026: Formal DLA comment period
- DLA comments addressed in revised RMP, where appropriate
- Anticipated February 28, 2027: RMP filed as part of the Project Final License Application

5.2. FUTURE AMENDMENTS TO THE RESOURCES MANAGEMENT PLAN

This RMP will be reviewed internally by SCE Operations staff on an annual basis and included in any environmental training for the Project. SCE may propose revisions to this RMP, as needed, subject to FERC approval. Prior to filing any substantive revisions with FERC, SCE will provide the proposed revisions to USFS, USFWS, the Bureau of Land Management, and CDFW for review and comment. SCE will allow 30 days for agency comments and will consider any comments received before filing the proposed revised RMP with FERC. The filing will include a summary of agency comments received and a brief description of how SCE addressed those comments, as appropriate.

Any amendments to this RMP will become effective upon approval by FERC.

6.0 REFERENCES

- CDFW (California Department of Fish and Wildlife). 2026. *California's Invaders: Golden Mussel*. Accessed: August 2026. Available at: <https://wildlife.ca.gov/Conservation/Invasives/Species/Golden-Mussel>
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APPENDIX E.2
WATER MANAGEMENT PLAN
(TO BE INCLUDED WITH FINAL LICENSE APPLICATION)

APPENDIX E.3
RECREATION RESOURCES MANAGEMENT PLAN

DRAFT RECREATION RESOURCES MANAGEMENT PLAN

**LUNDY HYDROELECTRIC PROJECT
FERC No. 1390**



Source: SCE, 2023



DRAFT RECREATION RESOURCES MANAGEMENT PLAN

**LUNDY HYDROELECTRIC PROJECT
FERC No. 1390**

Prepared for:



Energy for What's AheadSM

Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA 91770

Prepared by:

Kleinschmidt

October 2026

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TERMS AND ABBREVIATIONS

C

CM	County of Mono
Commission	Federal Energy Regulatory Commission

F

FERC	Federal Energy Regulatory Commission
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L

Lundy Project	Lundy Hydroelectric Project (FERC Project No. 1390)
---------------	---

P

Project	Lundy Hydroelectric Project (FERC Project No. 1390)
---------	---

R

REC-1	Recreation Use and Needs Assessment
REC-2	Recreation Facilities Inventory Assessment
RRMP	Recreation Resources Management Plan

S

SCE	Southern California Edison
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1.0 INTRODUCTION

1.1. BACKGROUND

Southern California Edison (SCE) is the licensee, owner, and operator of the Lundy Hydroelectric Project (Lundy Project or Project), Federal Energy Regulatory Commission (FERC or Commission) Project No. 1390, SCE is applying for a new license for the Project in accordance with FERC's Integrated Licensing Process. The Project has a total capacity of 3.0 megawatts.

The FERC relicensing process regarding recreation issues required scoping, execution of recreation studies, consultation with relevant agencies, and public involvement. The Recreation Use and Needs Assessment (REC-1) and the Recreation Facilities Inventory Assessment (REC-2) were conducted for the relicensing effort to assess recreation use at the Project and conduct an inventory and condition assessment of the Project recreation facilities. The results of REC-1 and REC-2 are summarized in Exhibit E of the Draft License Application. SCE will implement this Recreation Resources Management Plan (RRMP) following issuance of the FERC license.

1.2. REGIONAL RECREATION OPPORTUNITIES

Recreation opportunities in the Project vicinity are shaped by the combination of alpine scenery, accessible water resources, and proximity to the Eastern Sierra Nevada travel corridor. The Project provides recreation facilities that support camping, boating, fishing, and day use activities, which complement additional dispersed opportunities available on surrounding Inyo National Forest lands. These opportunities attract visitors seeking accessible outdoor experiences, particularly those traveling along U.S. Highway 395.

1.3. PROJECT RECREATION SITES

The primary draw for recreation within the Project Boundary is Lundy Lake, which provides opportunities for fishing, boating, and scenic viewing. Mill Creek and its surrounding riparian corridor also support angling. Hiking opportunities are more limited within the Project Boundary but are available nearby on public lands (Inyo National Forest) where visitors can access informal routes and trails. Scenic viewing, photography, and wildlife observation are commonly reported activities throughout the Project Area due to the high-quality visual setting. Consistent with these characteristics, recreation use at the Project is dominated by camping and fishing activities, with hiking and scenic viewing also commonly reported. The Project serves as a localized recreation destination that provides facilities in an area otherwise dominated by dispersed recreation opportunities.

1.4. PURPOSE AND CONTENT OF THE RECREATION MANAGEMENT PLAN

The purpose of this RRMP is to describe the existing Project-related recreation sites and provide procedures to support the operation and maintenance of these Project-related recreation sites over the term of the license, consistent with FERC requirements. Section 2.0 describes the existing recreation sites associated with the Project. Section 3.0

presents proposed recreation enhancements and associated implementation schedule. Section 4.0 summarizes recreation facility operations and maintenance procedures. Section 5.0 discusses recreation reporting and RRMP update procedures, if needed, over the term of the new license.

2.0 PROJECT RECREATION SITES

Project-related recreation sites included as part of this RRMP are shown on Figure 2-1 and include the Lundy Lake Boat Launch, Lundy Dam Day Use Area, Lundy Campground, Lundy Day Use Area 1, Lundy Day Use Area 2, Lundy Day Use Area 3, and Lundy Day Use Area 4. Descriptions of the Project-related recreation sites and facilities are provided below.

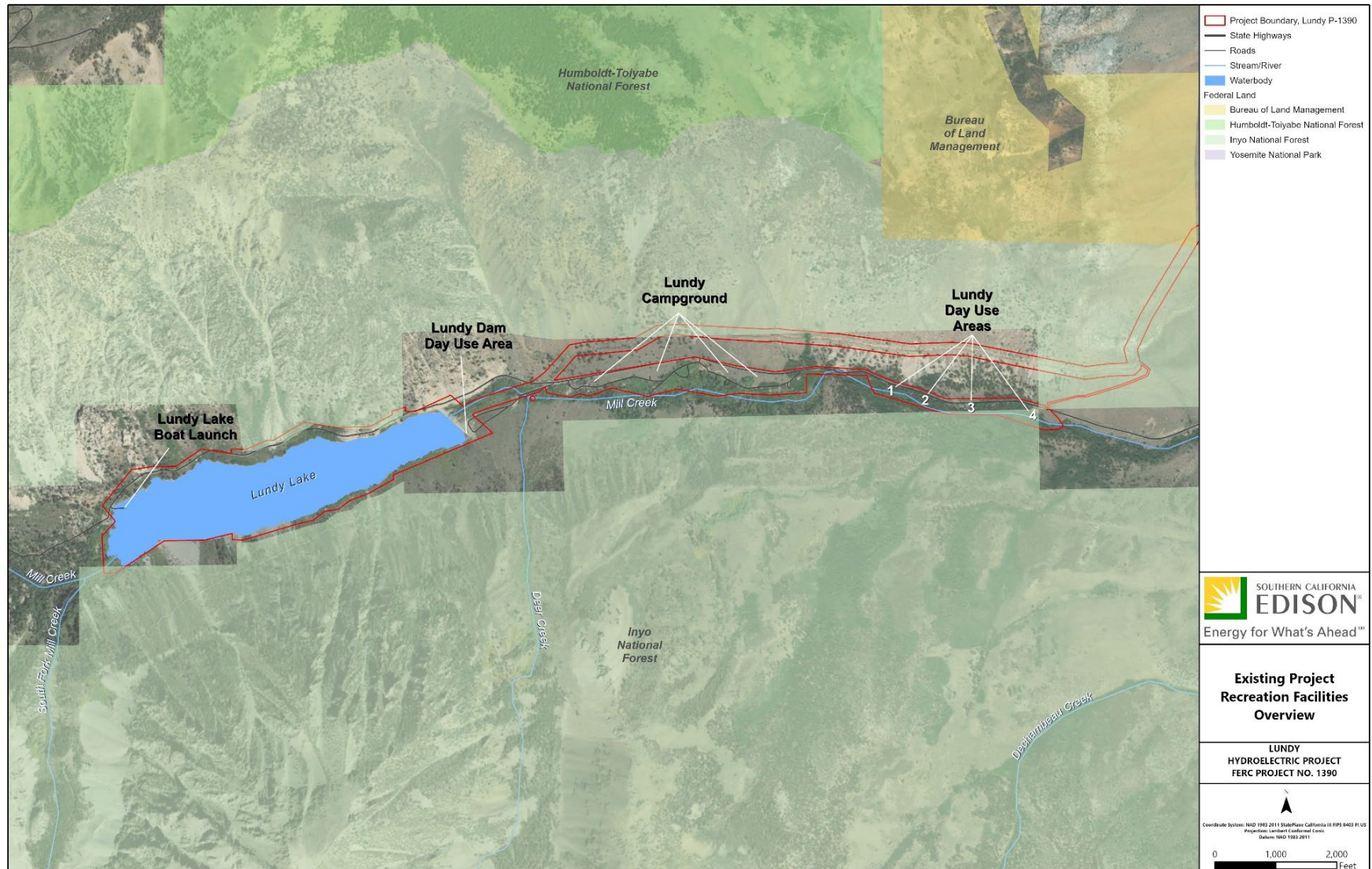


Figure 2-1. Lundy Project Recreation Sites.

2.1. LUNDY LAKE BOAT LAUNCH

The Lundy Lake Boat Launch (Photo 2-1) is the west-most recreation site at the Lundy Project and sits on the northwestern end of Lundy Lake. The site includes a boat launch concrete slab that extends into the lake, portable restrooms across the street from the boat launch, a small parking area of approximately 3,000 square feet to the left of the launch that holds five spaces for vehicles with trailer parking, and beach access throughout the area. Signage is also present, which captures the extents of invasive species known throughout the area and ways to mitigate the spread. A floatable dock is provided by Lundy Lake Resort located on the left side of the boat launch where boats and rafts can dock. A fishing line disposal receptacle is located on entry into the site, where anglers are encouraged to throw unused and tangled line into the container. The site is owned by SCE, while the operation and maintenance are provided by Mono County through a license agreement (CM and SCE, 2023).



Photo 2-1. Lundy Lake Boat Launch and Parking Area.

2.2. LUNDY DAM DAY USE AREA

The Lundy Dam Day Use Area (Photo 2-2) is located east of Lundy Lake at/around the Lundy Dam itself. The site includes a parking area that is approximately 3,550 square feet and holds approximately 20 single vehicle parking spaces, informational and safety signage, Americans with Disabilities Act accessible restroom, and a trash can. The site includes access to the lake and lakeshore via a walkway from the parking area to the lake. In addition, the site provides access to hiking and biking trails located outside of the Project Boundary. The site is owned, operated, and maintained by SCE, except for the restroom facility, which is maintained by Mono County through a license agreement (CM and SCE, 2023).



Photo 2-2. Lundy Dam Day Use Parking Area.

2.3. LUNDY CAMPGROUND

The Lundy Campground (Photo 2-3) is located east of Lundy Lake and consists of 38 individual campsites with three separate entrances into the campground. The campground consists of dirt/gravel roads to travel between campsites and hosts numerous amenities such as bear boxes, campfire rings, portable restrooms, vault restrooms, picnic tables, and signage. The campground costs \$15 per night per site (2026\$). Additional information about the campground, wildlife, and other concerns is located on a signage board in the middle of the campground near the central entrance. The Lundy Campground is owned by SCE, while the operation and maintenance are provided by Mono County through a license agreement (CM and SCE, 2023).



Photo 2-3. Lundy Campground Typical Site.

2.4. LUNDY DAY USE AREA 1

Lundy Day Use Area 1 (Photo 2-4) is found east of the Lundy Campground. Lundy Day Use Area 1 consists of a picnic table and a portable restroom. A parking space is located behind the portable restroom. This site is owned by SCE, while the operation and maintenance are provided by Mono County through a license agreement (CM and SCE, 2023). Lundy Day Use Area 1 access road and parking consist of a gravel road within Lundy Day Use Area 1 and a gravel parking area that is approximately 200 square feet.



Photo 2-4. Lundy Day Use Area 1.

2.5. LUNDY DAY USE AREA 2

Lundy Day Use Area 2 (Photo 2-5) is east of the Lundy Campground. Lundy Day Use Area 2 consists of two picnic tables and a social firepit on an old service road. The site is owned by SCE¹, while the operation and maintenance are provided by Mono County through a license agreement (CM and SCE, 2023). Lundy Day Use Area 2 access road and parking consist of a gravel road within Lundy Day Use Area 2. Parking was noted at three different locations where signs of past vehicles were found that total approximately 786 square feet.



Photo 2-5. Lundy Day Use Area 2.

¹ SCE is actively working to finalize the LAND-1 Study as part of relicensing to identify accurate land ownership within the Project boundary. Once the LAND-1 Study is final, ownership information at this site may be updated.

2.6. LUNDY DAY USE AREA 3

Lundy Day Use Area 3 (Photo 2-6) is located east of the Lundy Campground. Lundy Day Use Area 3 consists of a picnic table and a portable restroom. Parking is in three general areas of Lundy Day Use Area 3, with no true defined area for parking. The area consists of gravel. The site is owned by SCE², while the operation and maintenance are provided by Mono County through a license agreement (CM and SCE, 2023). Lundy Day Use Area 3 access road and parking consist of a gravel road within Lundy Day Use Area 3 and gravel parking areas that total approximately 720 square feet.



Photo 2-6. Lundy Day Use Area 3.

² SCE is actively working to finalize the LAND-1 Study as part of relicensing to identify accurate land ownership within the Project boundary. Once the LAND-1 Study is final, ownership information at this site may be updated.

2.7. LUNDY DAY USE AREA 4

Lundy Day Use Area 4 (Photo 2-7) is the furthest site east of the Lundy Campground. Lundy Day Use Area 4 consists of a picnic table and a portable restroom. The site is owned by SCE³, while the operation and maintenance are provided by Mono County through a license agreement (CM and SCE, 2023). Lundy Day Use Area 4 access road and parking consist of a gravel road within Lundy Day Use Area 4 and two gravel parking areas, which equal approximately 560 square feet.



Photo 2-7. Lundy Day Use Area 4.

³ SCE is actively working to finalize the LAND-1 Study as part of relicensing to identify accurate land ownership within the Project boundary. Once the LAND-1 Study is final, ownership information at this site may be updated.

3.0 PROPOSED RECREATION FACILITY ENHANCEMENTS

3.1. PROPOSED RECREATION FACILITY ENHANCEMENTS

SCE completed REC-1 and REC-2 during the relicensing process to help identify future recreation needs at the Project (described in Section 1.0). SCE used the findings from these studies to identify potential recreation improvements for implementation during the license term. No improvements are proposed currently. This section will be updated for the Final License Application, if needed.

4.0 RECREATION FACILITIES OPERATION AND MAINTENANCE

SCE proposes to maintain the Project-related recreation sites and associated facilities identified in Section 2.0 and Section 3.0 of this RRMP over the term of the new license. Maintenance, improvements, and repairs such as upkeep of parking areas, landscaping, restrooms, utilities, and other site amenities will be conducted on an observed, as-needed basis. The following list outlines the general operations and maintenance activities for each type of developed facility. SCE may use contracted staff, equipment, or materials as needed to meet these standards.

- **Buildings/restrooms:** Structures will be sanitary and maintained in good repair. If a structure is deemed in need of repair, it will be closed until repairs are completed.
- **Boat ramps:** Surfaces are to be kept in good and serviceable condition, and free of debris.
- **Picnic sites/campsites:** Picnic sites/campsites will be inspected for cleanliness, damage, and vandalism. Tables will be sturdy and ready for use. Campfire rings will be in good working condition.
- **Trash/litter collection:** The recreation areas will be kept clean. Trash containers will be emptied regularly.
- **Access roads:** Roads will be maintained in good and passable condition.
- **Site grounds:** Grass areas will be maintained in good condition. Grass will be mowed based on need. Trees will be trimmed as needed.
- **Signage:** Informational, interpretive, safety, and Project signage will be maintained in good condition.

5.0 REPORTING AND UPDATES

Every 15 years, SCE will review the RRMP and file a letter with FERC summarizing the condition of the FERC-approved recreation facilities and any available recreation use data collected at those facilities. If updates to the RRMP are warranted, SCE will consult with interested parties by distributing a revised draft RRMP and providing at least 30 days for review and comment before filing the revised RRMP with FERC for approval. If the review determines that no revisions are necessary, SCE will submit a written statement to FERC explaining why upgrades to the FERC-approved recreation facilities or other modifications to the RRMP are not needed.

6.0 REFERENCES

- CM (County of Mono) and SCE (Southern California Edison). 2023. License Agreement (Contract No. 9.1629) for Lundy Canyon Campground, Lundy Lake Boat Ramp, and Mill Creek Day Use Areas. Executed November 9, 2023 and November 13, 2023.
- SCE (Southern California Edison). 2023. *Photograph of Lundy Dam, Lundy Hydroelectric Project (FERC Project No. 1390), Mono County, California*. Unpublished photograph.

APPENDIX E.4
PROJECT ROADS MANAGEMENT PLAN

DRAFT PROJECT ROADS MANAGEMENT PLAN

LUNDY HYDROELECTRIC PROJECT FERC No. 1390



Source: SCE, 2023



DRAFT PROJECT ROADS MANAGEMENT PLAN

**LUNDY HYDROELECTRIC PROJECT
FERC No. 1390**

Prepared for:



Energy for What's AheadSM

Southern California Edison
2244 Walnut Grove Avenue
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Prepared by:

Kleinschmidt

October 2026

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Attachment A Detailed Map Set Showing Lundy Project Roads (to be included in Final License Application)	
Attachment B Project Roads Data from Studies Conducted in August 2026	

TERMS AND ABBREVIATIONS

B

BLM	Bureau of Land Management
BMP	best management practice

C

Commission	Federal Energy Regulatory Commission
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F

FERC	Federal Energy Regulatory Commission
------	--------------------------------------

L

LAND-1	Project Lands and Roads Study
Lundy Project	Lundy Hydroelectric Project (FERC Project No. 1390)

M

ML	maintenance level
----	-------------------

N

NFS	National Forest System
-----	------------------------

O

O&M	operation and maintenance
-----	---------------------------

P

Project	Lundy Hydroelectric Project (FERC Project No. 1390)
PRMP	Project Roads Management Plan

S

SCE	Southern California Edison
-----	----------------------------

U

USFS

U.S. Forest Service

1.0 INTRODUCTION

Southern California Edison (SCE) is the licensee, owner, and operator of the Lundy Hydroelectric Project (Lundy Project or Project), Federal Energy Regulatory Commission (FERC or Commission) Project No. 1390. The Lundy Project includes XX Project roads that are used to access, maintain, and operate the Project facilities. This Project Roads Management Plan (PRMP) describes SCE's responsibilities related to the maintenance of the Project roads during the license term.

1.1. PROJECT LOCATION AND FEATURE DESCRIPTION

The Lundy Project is located on the eastern slope of the Sierra Nevada along Mill Creek, approximately 5 miles west of Mono City off Lundy Road in Mono County, California. The Project has an authorized operating capacity of 3.0 megawatts. The primary Lundy Project facilities include Lundy Dam, Lundy Lake, a flowline consisting of a pipeline and penstock, Lundy Powerhouse, and the Mill Creek Return Ditch. The Project includes seven developed recreation sites: Lundy Lake Boat Launch, Lundy Dam Day Use Area, Lundy Campground, Lundy Day Use Area 1, Lundy Day Use Area 2, Lundy Day Use Area 3, and Lundy Day Use Area 4.

Most Lundy Project facilities are located on land owned by SCE. Small portions of the Project are partly within National Forest System (NFS) lands administered by the Inyo National Forest, and partly on federal lands administered by the Bureau of Land Management (BLM).¹ There are a total of 29,527.72 feet of Project roads that intersect NFS land: three sections of the penstock access road (14,340.78 feet) and two Mill Creek Return Ditch access roads (8,684.78 feet). All Lundy Project roads within the FERC Project Boundary are covered by this PRMP, regardless of land jurisdiction.

1.2. CONTENTS OF PLAN

This PRMP is organized into the following sections:

- Section 1.0: Introduction.
- Section 2.0: Plan Goal and Objectives.
- Section 3.0: Roads Covered Under this Plan. This section lists the Project roads that are covered under this plan.
- Section 4.0: Inspection and Maintenance Activities. This section identifies the inspection and maintenance activities that SCE will implement along the Project roads during the license term.

¹ While there are approximately 2.9 acres of BLM-managed lands within the proposed Project Boundary, no Project roads are included within that area.

- Section 5.0: Project-related Erosion along Project Roads. This section identifies the Project road segments with erosion and provides a schedule for repairs.
- Section 6.0: Environmental and Cultural Resource Protection Measures. This section describes measures for the protection of environmental and cultural resources when conducting non-routine, non-emergency maintenance along a Project road.
- Section 7.0: Permitting. This section describes SCE's responsibilities for obtaining permits prior to implementing non-routine maintenance along a Project road.
- Section 8.0: Reporting, Consultation, and Plan Revisions. This section describes annual reporting of non-routine maintenance projects along a Project road, consultation requirements, and the process for revising the PRMP.
- Section 9.0: References.

2.0 PLAN GOAL AND OBJECTIVES

The goal of this PRMP is to outline SCE's responsibilities regarding Lundy Project road maintenance. The objectives of this PRMP are to:

- Identify the Lundy Project roads covered under this plan;
- Describe SCE's road inspection practices, road maintenance objectives, routine and non-routine maintenance practices, and procedures that would be implemented in the event that emergency road repairs are needed;
- Identify how SCE will address Lundy Project-related erosion along Project roads;
- Identify the measures that SCE will implement to protect environmental and cultural resources, and to protect water quality, when conducting Lundy Project road maintenance;
- Identify SCE's consultation, permitting, and reporting requirements; and
- Identify procedures for periodically updating this PRMP.

3.0 ROADS COVERED UNDER THIS PLAN

The measures outlined in this PRMP are applicable to the Lundy Project roads identified in Table 1; these roads are those that are used almost exclusively by SCE to access, operate, and maintain the Lundy Project facilities. Additionally, this PRMP is applicable to FERC-approved recreation site access roads within the Lundy Project Boundary which are used and maintained by others and are described in the Recreation Management Plan.

Table 1. Lundy Project Roads. (Note: Final License Application will include maps and figures delineating locations, lengths, nomenclature, and landownership of Project Roads)

Name	Jurisdiction/Ownership	Approximate Length (feet)
Lundy Dam Valve House Access Road	SCE	250
Weather Station Access Road	SCE	152
Penstock/Flowline Access Road	SCE/USFS	7,174/3,3111
Sand Trap Access Road	SCE	782
Powerhouse Access Road	SCE	482
Return Ditch Access Road-North	USFS	374
Return Ditch Access Road-South	USFS	368

USFS = U.S. Forest Service; SCE = Southern California Edison

The Lundy Project roads in Table 1 were identified based on the Project Lands and Roads Study (LAND-1) conducted by SCE in 2025 and 2026, which was one of 12 FERC-approved studies implemented by SCE in association with the Lundy Project relicensing effort. LAND-1 methods and results are documented in detail in the LAND-1 draft report (DLA Volume III), which is included in the license application.

The locations of all the Lundy Project roads identified in Table 1 are shown on the detailed map set included in Attachment A of this PRMP. Description and condition information for the Lundy Project roads covered in this PRMP and all associated features (e.g., gates, culverts, signage) are provided in Attachment B. The information included in Attachment B was developed as part of LAND-1.

As summarized in Table 1 and depicted on the detailed map set in Attachment A, the Lundy Project roads cross (1) private land owned by SCE; and (2) public lands managed by the U.S. Forest Service (USFS)—Inyo National Forest. The Project roads in Table 1 are subject to the inspection and maintenance procedures described in Section 4.0, regardless of landownership and/or jurisdiction.

Future additions or removals of Project roads may require updates to Attachment A, Attachment B, and Table 1 through the plan revision process described in Section 8.3.

4.0 INSPECTION AND MAINTENANCE ACTIVITIES

This section identifies the inspection and maintenance activities that SCE will implement along the Lundy Project roads identified in Table 1 above during the license term. Maintenance activities shall be implemented consistent with the environmental and cultural resource protection measures described in Section 6.0. As described in the RRMP the Project Roads in day-use areas and the campgrounds are maintained by Mono County under agreement with SCE.

4.1. REGULAR INSPECTIONS

SCE will inspect Lundy Project roads during standard operation and maintenance (O&M) of the Project facilities to identify issues and maintenance needs. Maintenance of the Lundy Project roads, routine and non-routine, as identified during standard O&M activities will be completed on an as-needed basis, as discussed in the following sections. Maintenance needs that are identified during standard O&M activities will typically be addressed within 2 weeks, provided:

- Weather conditions are acceptable to ensure safe access by SCE and/or SCE's contractors;
- Physical conditions are acceptable to ensure safe access by SCE and/or SCE's contractors; and
- The necessary supplies and equipment can be obtained.

Larger issues (e.g., road blockages, substantive erosion) may require additional time depending upon the extent and complexity of the issue. Some non-routine maintenance activities may be subject to permitting and consultation requirements, as outlined in Sections 7.0 and 8.0 of this PRMP.

4.2. MAINTENANCE OBJECTIVES

Lundy Project roads will be maintained at a level suitable for safe travel using high-clearance vehicles. Lundy Project roads on USFS land will be maintained to meet USFS road maintenance levels (MLs). The USFS road ML for all the Lundy Project roads that cross USFS land is ML 2, which is defined in Forest Service Handbook 7709.59, section 62.32 (as cited in USFS, 2012a), as follows:

“Assigned to roads open for use by high-clearance vehicles. Passenger car traffic, user comfort, and user convenience are not considerations. Warning signs and traffic control devices are not provided with the exception that some signing, such as W-18-1 ‘No Traffic Signs’ may be posted at intersections. Motorists should have no expectations of being alerted to potential hazards while driving these roads. Traffic normally is minor, usually consisting of one or a combination of administrative, permitted, disperse recreation or other specialized uses. Log haul may occur at this level.” (p. 6)

Additional information and guidance about USFS MLs is available in the following USFS publication: *Guidelines for Road Maintenance Levels* (USFS, 2012a).

4.3. ROUTINE MAINTENANCE

Routine maintenance of Lundy Project roads described in Table 1 will be completed by SCE during normal Project O&M activities. Routine maintenance of the Lundy Project roads includes the following types of activities:

- Debris removal;
- Vegetation management, including manual weed removal, and undergrowth and hazard tree maintenance within 10 feet of the edge of a Project road;
- Surface maintenance, which includes grading and placing aggregate fill in ruts and potholes;
- Drainage management, which includes clearing and maintenance of existing erosion control features such as culverts, drains, ditches, lead-off ditches, and water bars, and creation of new water bars, as needed;
- Repair, replacement, or installation of access control features such as posts, rails, gates, and barrier rock;
- Repair and/or replacement of existing signage; and

- Snow plowing, which is conducted on an as-needed basis using a grader or truck-mounted plow.

The routine maintenance activities identified above are minor in nature and occur within the existing, previously disturbed road alignments. Therefore, no impacts to environmental or cultural resources associated with the above-referenced maintenance activities are expected. Accordingly, the above-referenced routine maintenance activities are allowed under the Commission's standard Use and Occupancy article and exempt from the consultation, permitting, monitoring, and reporting requirements described in this PRMP. Overall, implementation of the routine maintenance activities identified above will help ensure the Lundy Project facilities are safely accessible, reduce the potential for excessive erosion and sedimentation, and defer the need for non-routine maintenance.

4.4. NON-ROUTINE MAINTENANCE

Non-routine maintenance of Lundy Project roads describe in Table 1 may sometimes be necessary. For the purposes of this PRMP, non-routine maintenance includes the following types of activities:

- Installing a new culvert;
- Removing, replacing, or upsizing an existing culvert;
- Chip sealing or paving an aggregate or native surface road;
- Completely resurfacing an existing paved road;
- Removing a hazard tree beyond 10 feet of the edge of a Project road;
- Developing a new road or realigning an existing Lundy Project road;
- Constructing or replacing a bridge deck or ford; and
- Implementing large-scale slope stabilization measures.

Non-routine maintenance will be implemented in accordance with either Mono County or USFS land management practices, as applicable, based on landownership where the work is to occur, with consideration to the type and level of use that occurs along the Project road. Non-routine road maintenance activities on road segments that cross NFS or BLM land will be planned and implemented in consultation and coordination with USFS and BLM, depending upon land jurisdiction. Upon mutual agreement of the work to be completed, SCE will notify USFS or BLM at least 3 business days prior to beginning non-routine maintenance activities on NFS or BLM land.

4.5. EMERGENCY ROAD REPAIRS

In the event of an emergency incident that blocks road access to a Lundy Project facility and/or threatens public safety, SCE will notify the appropriate land management agency

(i.e., USFS or Mono County) to coordinate the repair. Emergency road repairs will be documented in the annual report described in Section 8.0 of this PRMP.

5.0 PROJECT-RELATED EROSION ALONG PROJECT ROADS

As of preparation of this PRMP, no Lundy Project-related erosion sites requiring corrective action have been identified along Project roads. Any future erosion issues identified during inspections will be evaluated and addressed through the maintenance procedures described in Section 4.0.

6.0 ENVIRONMENTAL AND CULTURAL RESOURCE PROTECTION MEASURES

SCE developed a variety of management plans that are designed to protect environmental and cultural resources within the Lundy Project Boundary. The management plans identified below provide resource-specific avoidance, minimization, and best management practices (BMPs) that supplement the maintenance procedures described in Sections 4.0 and 5.0 of this PRMP:

- Resources Management Plan (Appendix E.1, DLA Volume II),
- Recreation Resources Management Plan (Appendix E.3, DLA Volume II), and
- Historic Properties Management Plan (Appendix E.5, to be filed with the Final License Application).

Non-routine road maintenance activities described in Section 4.4 and emergency repairs described in Section 4.5 are subject to the applicable BMPs and protection measures identified below, as appropriate. Specific BMPs and avoidance and protection measures will be applied on a case-by-case basis, in consultation with the land or resource agencies, with consideration to the location, extent, and type of work to be performed. All road improvements or rehabilitation activities conducted on NFS land will include BMPs identified in the following USFS documents, or more current versions of these documents, if available:

- National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1. National Core BMP Technical Guide – FS-990a. (USFS, 2012b).
- Forest Service Handbook, Southwest Region (Region 5), Vallejo, CA. R5 FSH 2509.22 – Soil and Water Conservation Handbook, Chapter 10 – Water Quality Management Handbook (USFS, 2011).

The BMPs identified in the above-referenced documents are designed to minimize soil disturbance and reduce delivery of sediment to waterbodies.

7.0 PERMITTING

SCE will be responsible for obtaining all necessary permits and approvals prior to implementing a non-routine maintenance project along a Lundy Project road. Permitting requirements apply only to the non-routine maintenance activities identified in Section 4.4. Necessary permits will be identified in consultation with the appropriate resource agency, with consideration to the type of work to be completed, the location of the work, and proximity to a waterbody.

8.0 REPORTING, CONSULTATION, AND PLAN REVISIONS

This section identifies SCE's requirements regarding reporting, consultation, and plan revisions. Reporting and consultation requirements apply to non-routine road maintenance activities described in Section 4.4 and emergency repairs described in Section 4.5.

8.1. ANNUAL REPORTING

All non-routine maintenance projects implemented along a Lundy Project road on federal land will be summarized in an annual Project Road Maintenance Summary Report (Summary Report). The Summary Report will document SCE's consultation efforts, such as any significant decisions made in collaboration with the resource agencies, including during the Annual Consultation Meeting to be conducted with USFS. A courtesy copy of the annual Summary Report will be provided to USFS and FERC.

8.2. CONSULTATION

SCE will consult with Mono County and USFS, as appropriate based on landownership and jurisdiction, at least 60 days prior to implementing any non-routine, non-emergency maintenance along a Lundy Project road situated on their property to:

- Review and modify the proposed action;
- Identify appropriate BMPs and avoidance protection measures that may be necessary to protect water quality, special-status plants and special-status wildlife, and cultural resources; and
- Identify periods when maintenance activities may be limited based on the proximity of special-status wildlife species.

All consultation discussions and decisions will be documented, as necessary, and included in the annual report described in Section 8.1 of this PRMP.

8.3. PLAN REVISIONS

If significant changes in the existing conditions occur, SCE will review this PRMP and update or revise, as necessary, in consultation with the following agencies to the extent these agencies are interested in consulting: USFS and Mono County.

Changes may be implemented if feedback indicates that the resource objectives identified in this PRMP are not being met. Sixty days will be allowed for the aforementioned parties to provide written comments and recommendations. After consultation and written agreement with USFS, SCE will file the updated PRMP with FERC for approval. SCE will include all relevant documentation of coordination and consultation with the updated PRMP filed with FERC. If SCE does not adopt a particular recommendation by an agency, the filing will include the reasons for not doing so.

9.0 REFERENCES

SCE (Southern California Edison). 2023. *Photograph of Lundy Campground Access Roads, Lundy Hydroelectric Project (FERC Project No. 1390), Mono County, California*. Unpublished photograph.

USFS (U.S. Forest Service). 2011. Forest Service Handbook (FSH) 2509.22, Soil and Water Conservation Handbook, Chapter 10, Water Quality Management Handbook. Pacific Southwest Region (Region 5). Vallejo, California.

_____. 2012a. Guidelines for Road Maintenance Levels. National Technology and Development Program, 1177-1811-SDTDC, June 2012. San Dimas, California.

_____. 2012b. National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1: National Core BMP Technical Guide (FS-990a). Washington D.C.

ATTACHMENT A
DETAILED MAP SET SHOWING LUNDY PROJECT ROADS
[TO BE INCLUDED WITH FINAL LICENSE APPLICATION]

ATTACHMENT B
PROJECT ROADS DATA FROM STUDIES CONDUCTED IN AUGUST 2026

Project Roads Inventory and Condition Assessment

Road Name	Project Purpose	Condition Assessment	Improvements/Maintenance Needed
Lundy Dam Valve House Access Road	Provides access to the Lundy Dam Valve House	Fair to poor condition minor grading and repair, brush removal	Maintenance only
Weather Station Access Road	Provides access to the Project weather station	Fair to poor condition minor grading and repair, brush removal	Maintenance only
Flowline and Penstock Access Road	Provides access to the Flowline and Penstock	Good condition	None
Sand Trap Access Road	Provides access to the Project Sand Trap	Fair to poor condition minor grading and repair, brush removal	Maintenance only
Powerhouse Access Road	Project access is limited to road provided beyond the gate to the Project Powerhouse	Good condition	None
Return Ditch Access Road-North	Provides access to the Return Ditch for maintenance	Fair to poor condition minor grading and repair, brush removal	Maintenance only
Return Ditch Access Road-South	Provides access to the Return Ditch for maintenance	Fair to poor condition minor grading and repair, brush removal	Maintenance only

APPENDIX E.5
HISTORIC PROPERTIES MANAGEMENT PLAN
(TO BE INCLUDED WITH FINAL LICENSE APPLICATION)

APPENDIX E.6
CONSULTATION LOG



Outlook

Lundy Hydroelectric Relicensing Follow-up, Mono County, CA

From Steve Norton <steve.norton@psomas.com>

Date Wed 7/29/2026 11:59 AM

To Mellison, Chad <chad_mellison@fws.gov>

Cc Matthew Woodhall <matthew.woodhall@sce.com>; Finlay Anderson <finlay.anderson@kleinschmidtgroup.com>; Angela Whelpley <Angela.Whelpley@KleinschmidtGroup.com>; Allison Rudalevige <allison.rudalevige@psomas.com>; Brad Blood <bblood@psomas.com>; Stephenson, Tom@Wildlife <Tom.Stephenson@wildlife.ca.gov>

Good morning Chad,

Southern California Edison, SCE, is the licensee of the Lundy Hydroelectric Project, located in Mono County, CA. The Federal Energy Regulatory Commission (FERC) has designated SCE as its non-federal representative for Endangered Species Act (ESA) consultation. On behalf of SCE, we are requesting the following regarding the relicensing of the Lundy Hydroelectric Project located in Mono County, CA. Please confirm the federally-listed species listed in the 2026 IPAC report (as listed below) are sufficient for a review for this relicensing effort. These species are:

- gray wolf;
- North American wolverine;
- Sierra Nevada bighorn sheep;
- Sierra Nevada red fox;
- greater sage-grouse;
- Southwestern willow flycatcher;
- yellow-billed cuckoo;
- Northwestern pond turtle;
- foothill yellow-legged frog;
- Sierra Nevada yellow-legged frog;
- monarch butterfly; and
- whitebark pine.

A reissuance of this FERC license, as currently proposed, would result in continuing the existing conditions onsite. As no changes would occur as a result of relicensing this Project, we do not currently anticipate any of the species listed above would be adversely affected.

Please confirm receipt of this correspondence and let me know if you have any edits, concerns, questions, or findings that would conflict with the above language.

Thank you,

Steve Norton

Senior Biologist

Office/Mobile: 714.481.8037

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CALIFORNIA COASTAL COMMISSION

ENERGY, OCEAN RESOURCES AND FEDERAL CONSISTENCY
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
VOICE (415) 904-5200
WEB: WWW.COASTAL.CA.GOV



June 4, 2026

Angela Whelpley
Project Regulatory Consultant
Southern California Edison
Lundy Hydroelectric Project Relicensing
Via email to: Angela.Whelpley@KleinschmidtGroup.com

Re: No Effects Determination, Lundy Hydroelectric Project Relicensing (FERC Project No. P-1390)

Dear Ms. Whelpley:

We have received your e-mail inquiry dated June 3, 2026, in which you have determined that the above-referenced relicensing of Southern California Edison (SCE)'s Lundy Hydroelectric Project, in Mono County, California, would be consistent to the maximum extent practicable with the California Coastal Management Program. The proposed issuance of a new operation license by the Federal Energy Regulatory Commission (FERC) would extend authorization of the project for 30 years.

Because the proposed project is located outside of California's coastal zone and would not have reasonably foreseeable coastal effects, Commission staff concurs with your determination. If you have any questions, please contact me at joseph.street@coastal.ca.gov

Sincerely,

A handwritten signature in blue ink that reads "Joseph Street".

Joseph Street (Manager)
Energy, Ocean Resources,
and Federal Consistency Division

**APPENDIX E.7
FLOW DURATION CURVES
(WATER YEARS 1988–2025)**

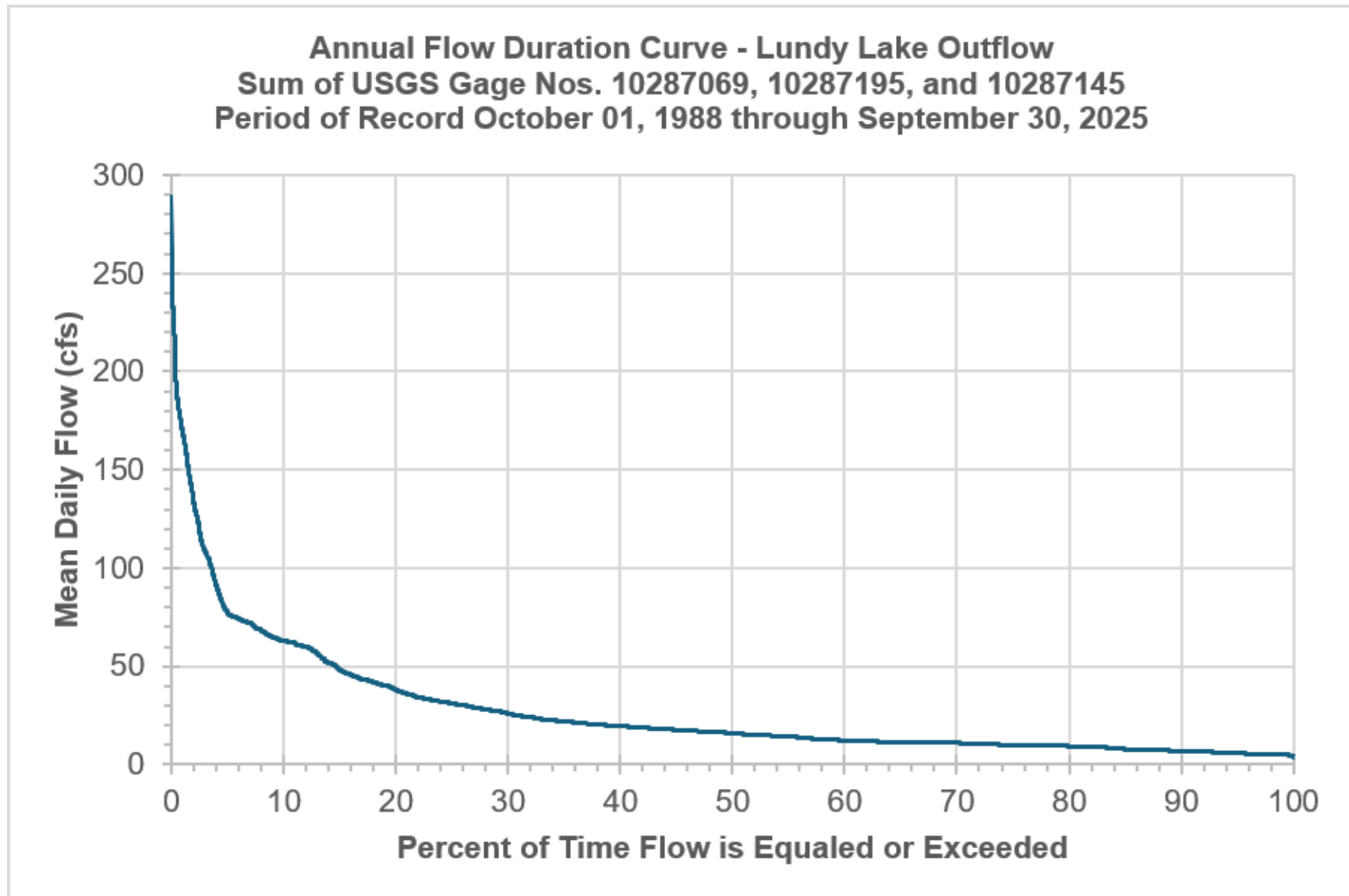


Figure 1. Annual Flow Duration Curve for Lundy Lake Outflow, 1988–2025.

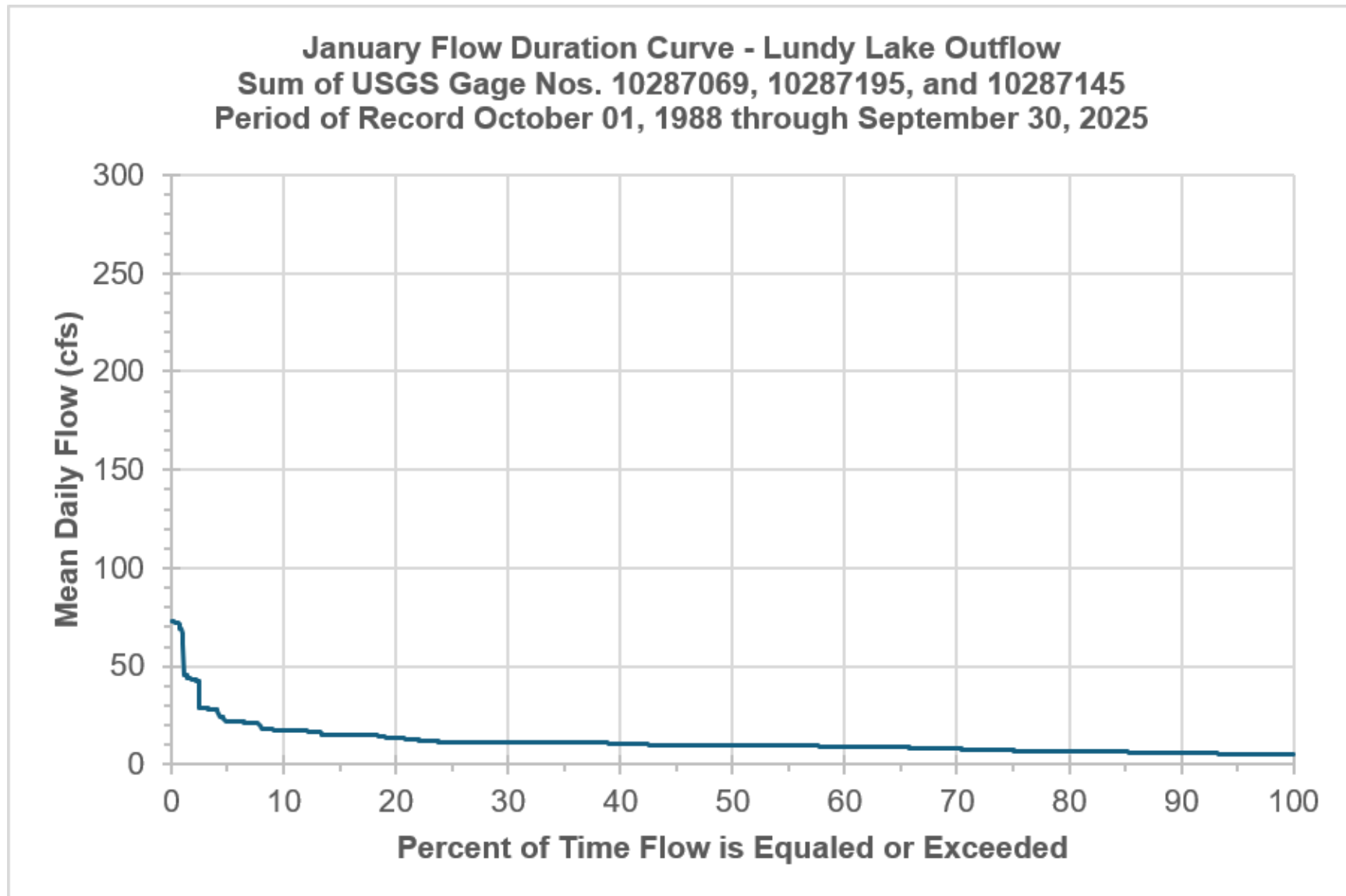


Figure 2. Monthly Flow Duration Curve for Lundy Lake Outflow, January 1988–2025.

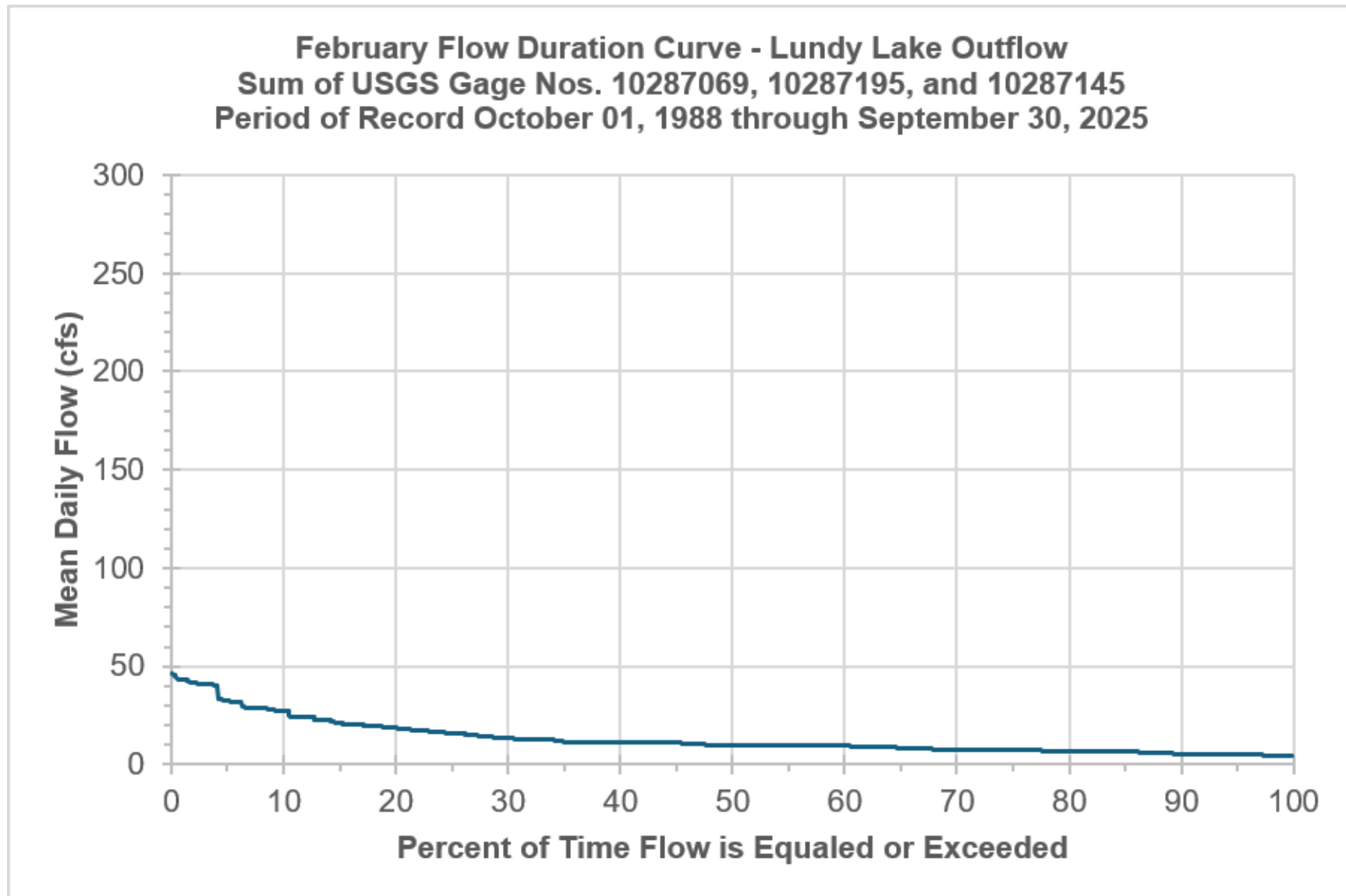


Figure 3. Monthly Flow Duration Curve for Lundy Lake Outflow, February 1988–2025.

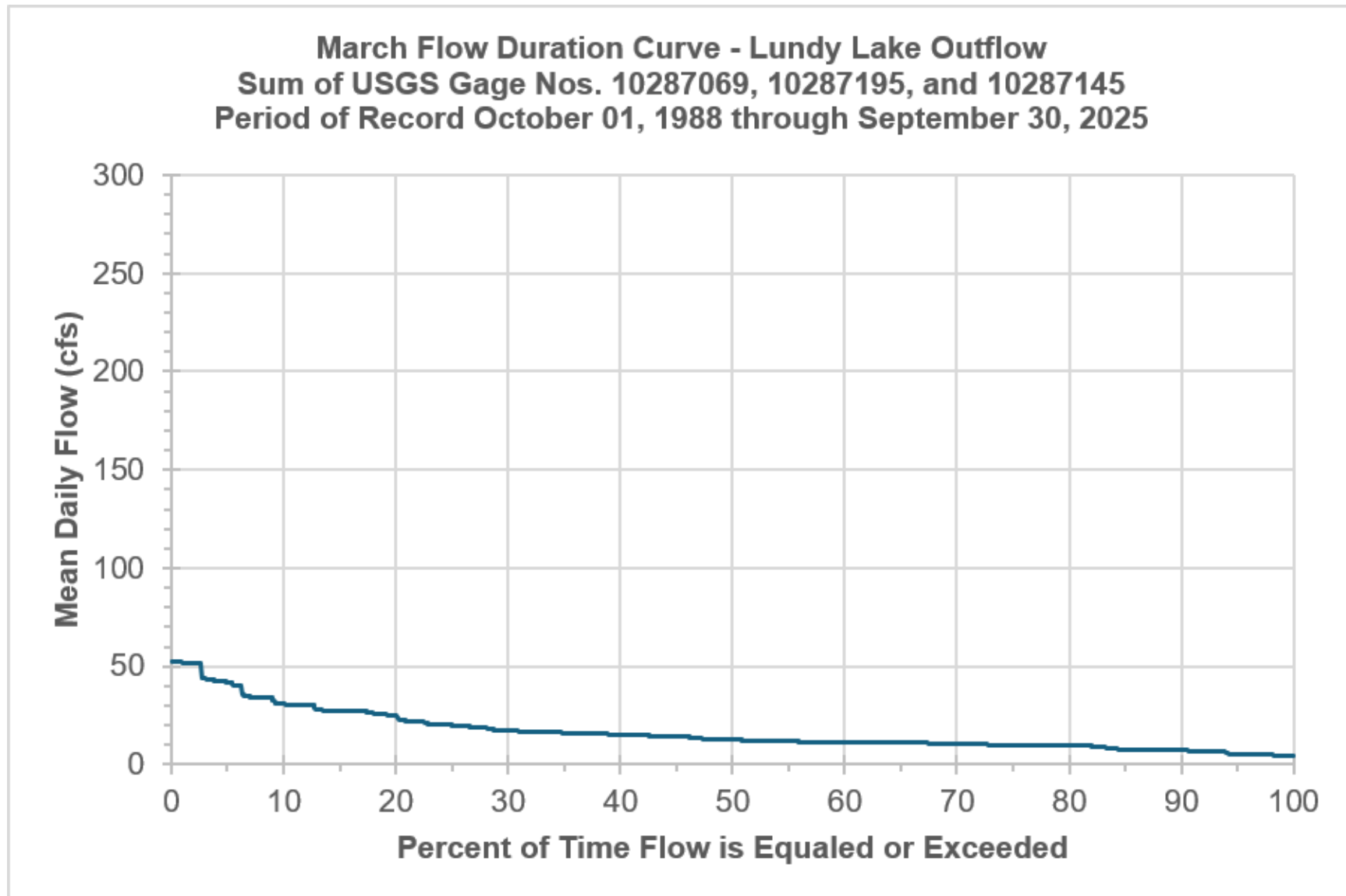


Figure 4. Monthly Flow Duration Curve for Lundy Lake Outflow, March 1988–2025.

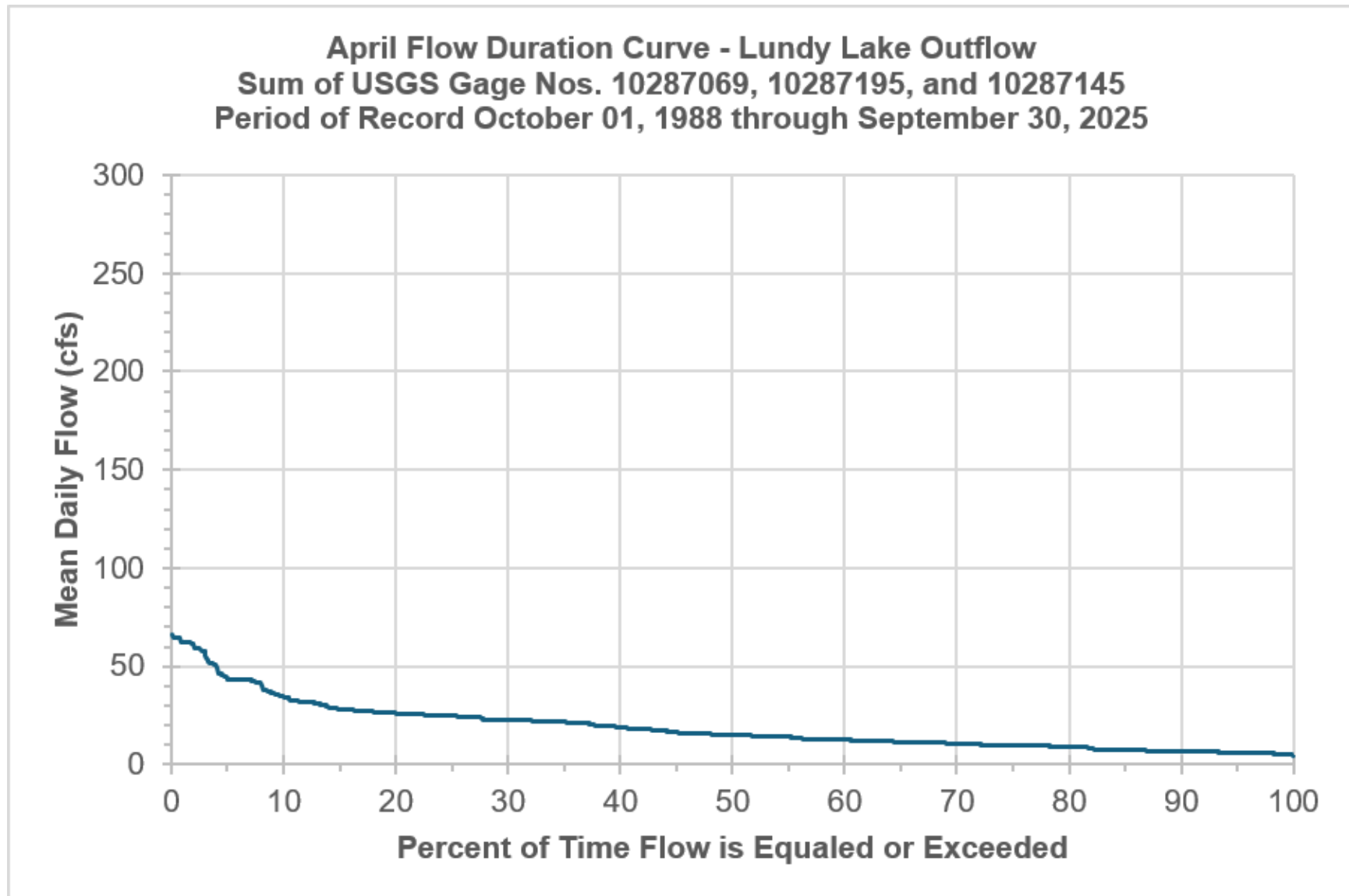


Figure 5. Monthly Flow Duration Curve for Lundy Lake Outflow, April 1988–2025.

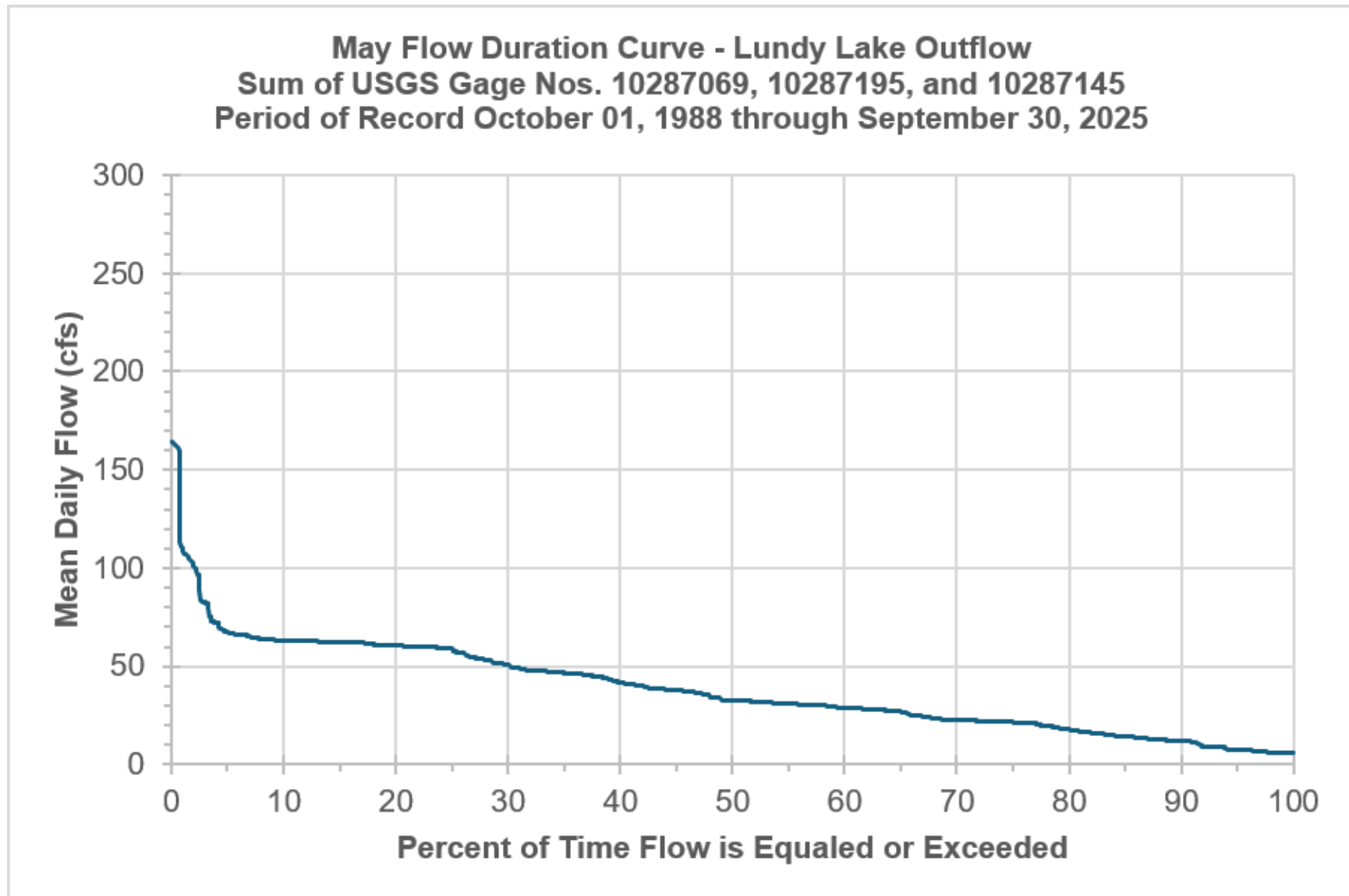


Figure 6. Monthly Flow Duration Curve for Lundy Lake Outflow, May 1988–2025.

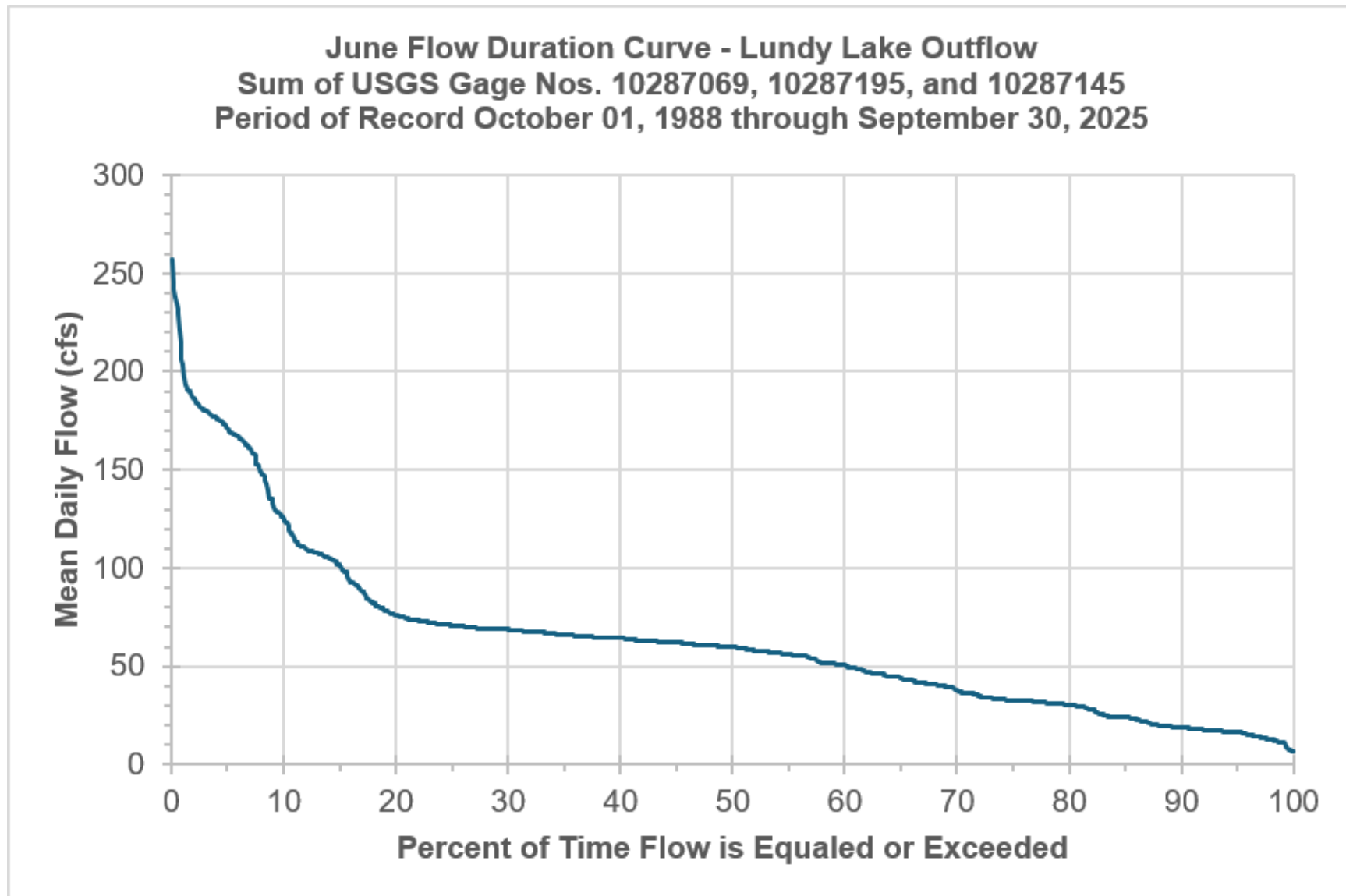


Figure 7. Monthly Flow Duration Curve for Lundy Lake Outflow, June 1988–2025.

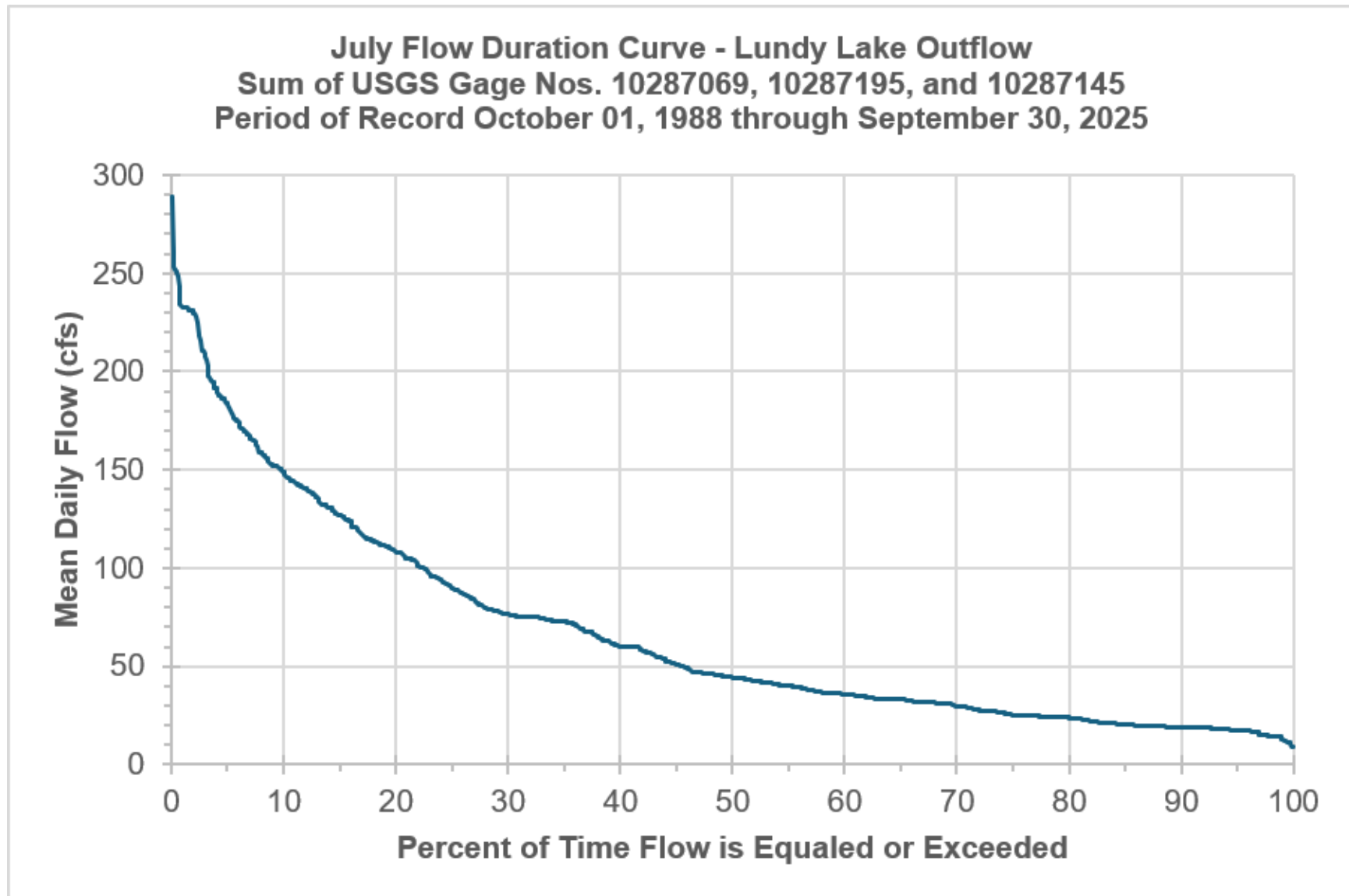


Figure 8. Monthly Flow Duration Curve for Lundy Lake Outflow, July 1988–2025.

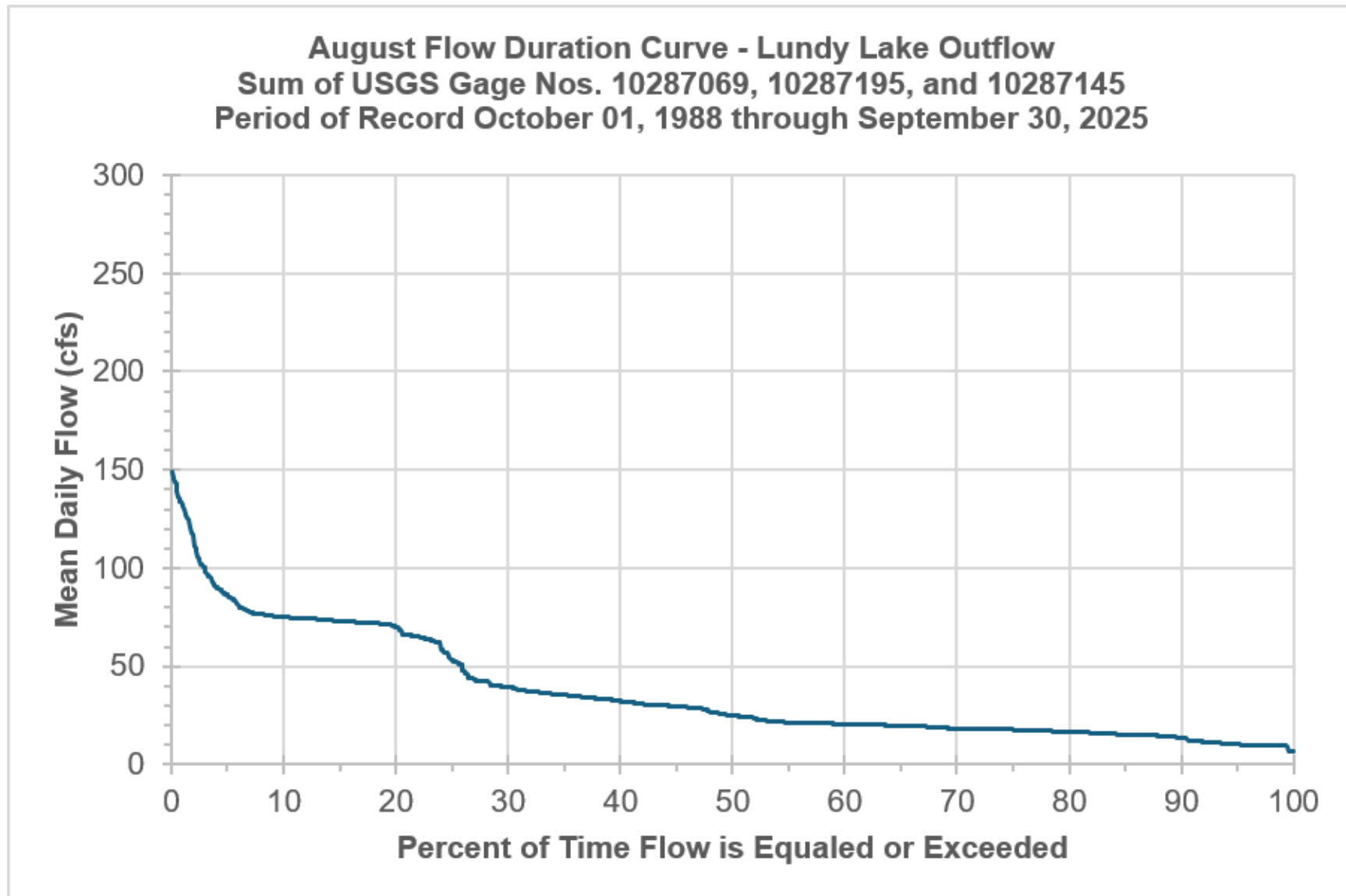


Figure 9. Monthly Flow Duration Curve for Lundy Lake Outflow, August 1988–2025.

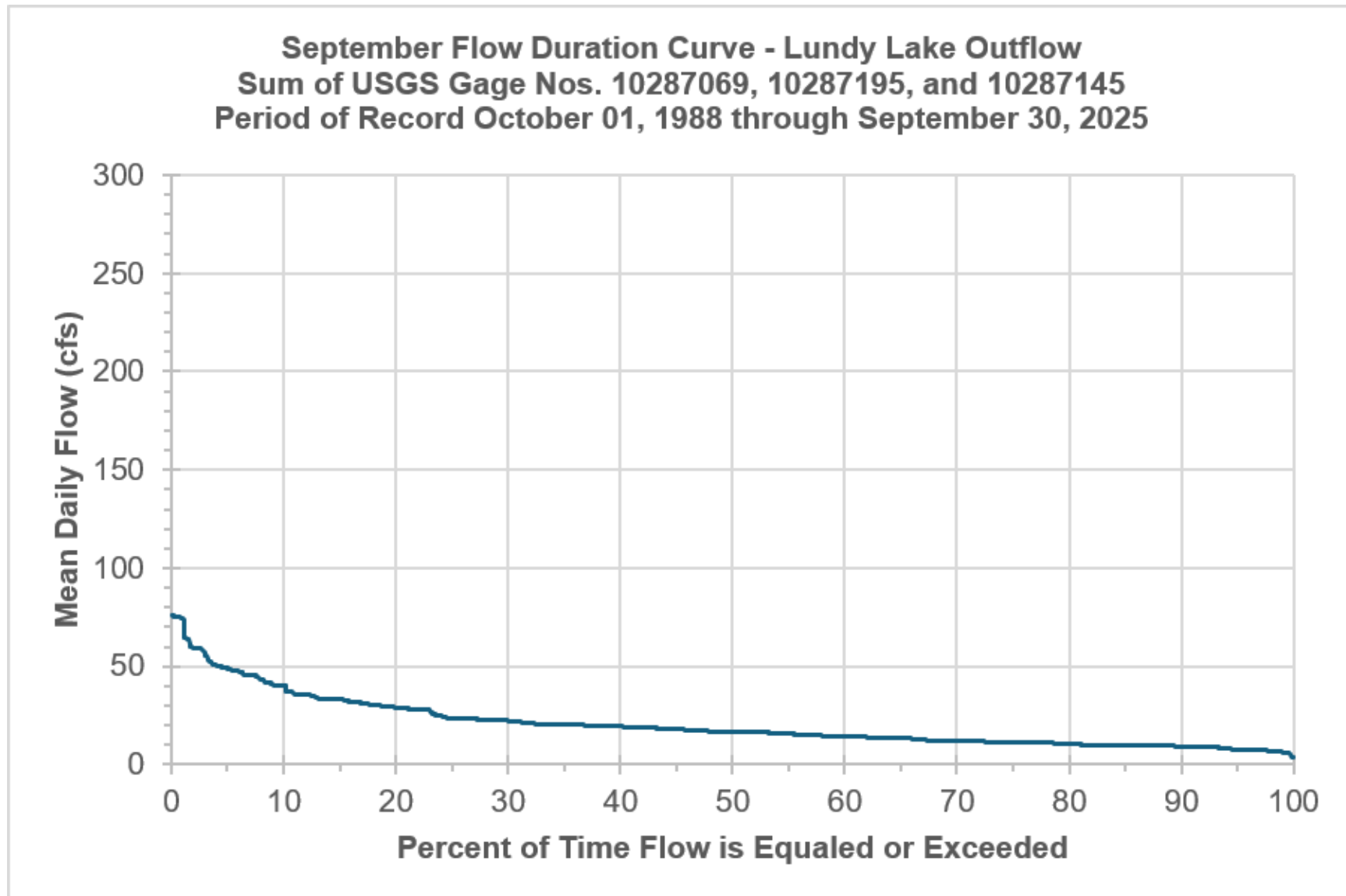


Figure 10. Monthly Flow Duration Curve for Lundy Lake Outflow, September 1988–2025.

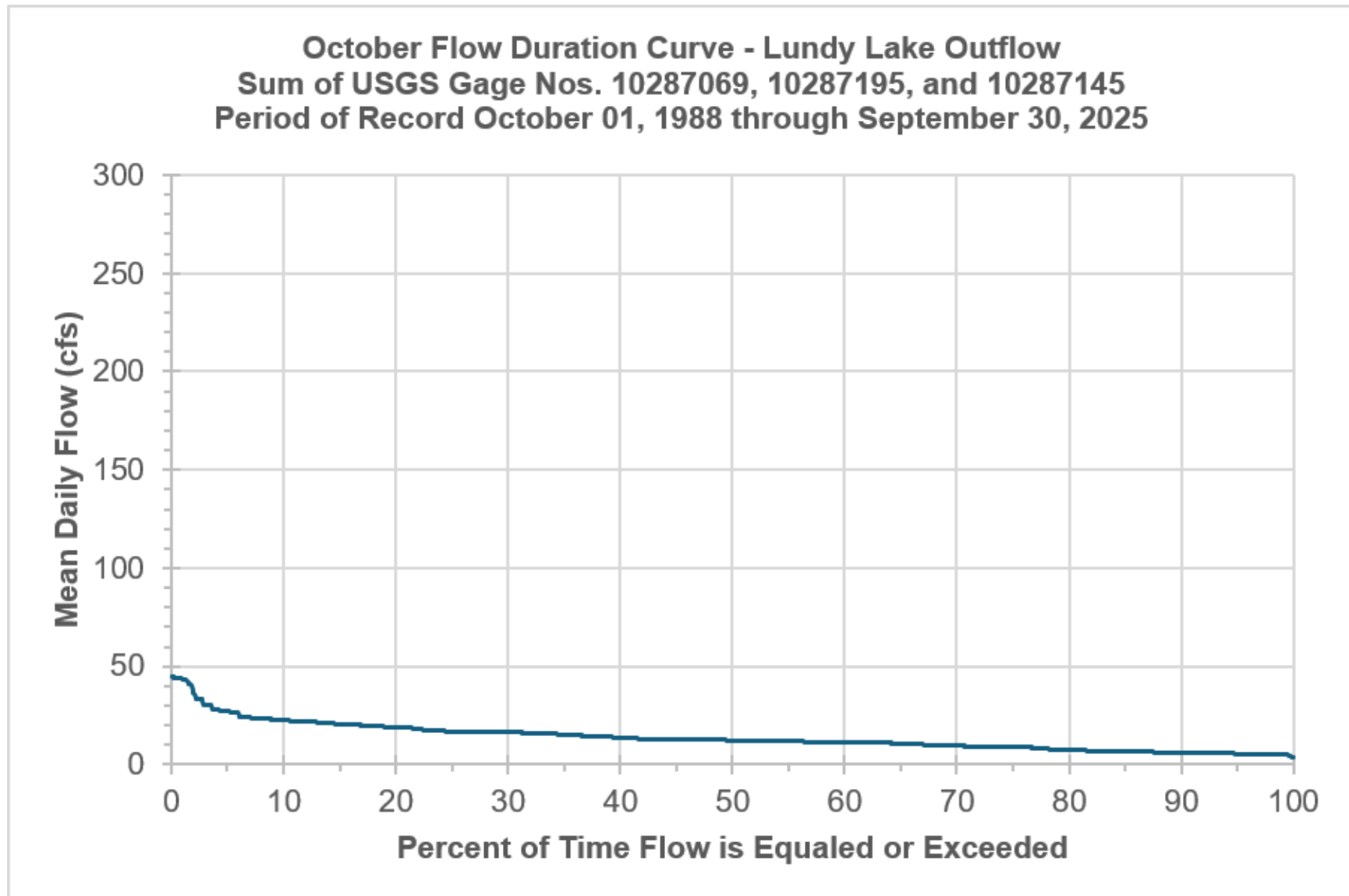


Figure 11. Monthly Flow Duration Curve for Lundy Lake Outflow, October 1988–2025.

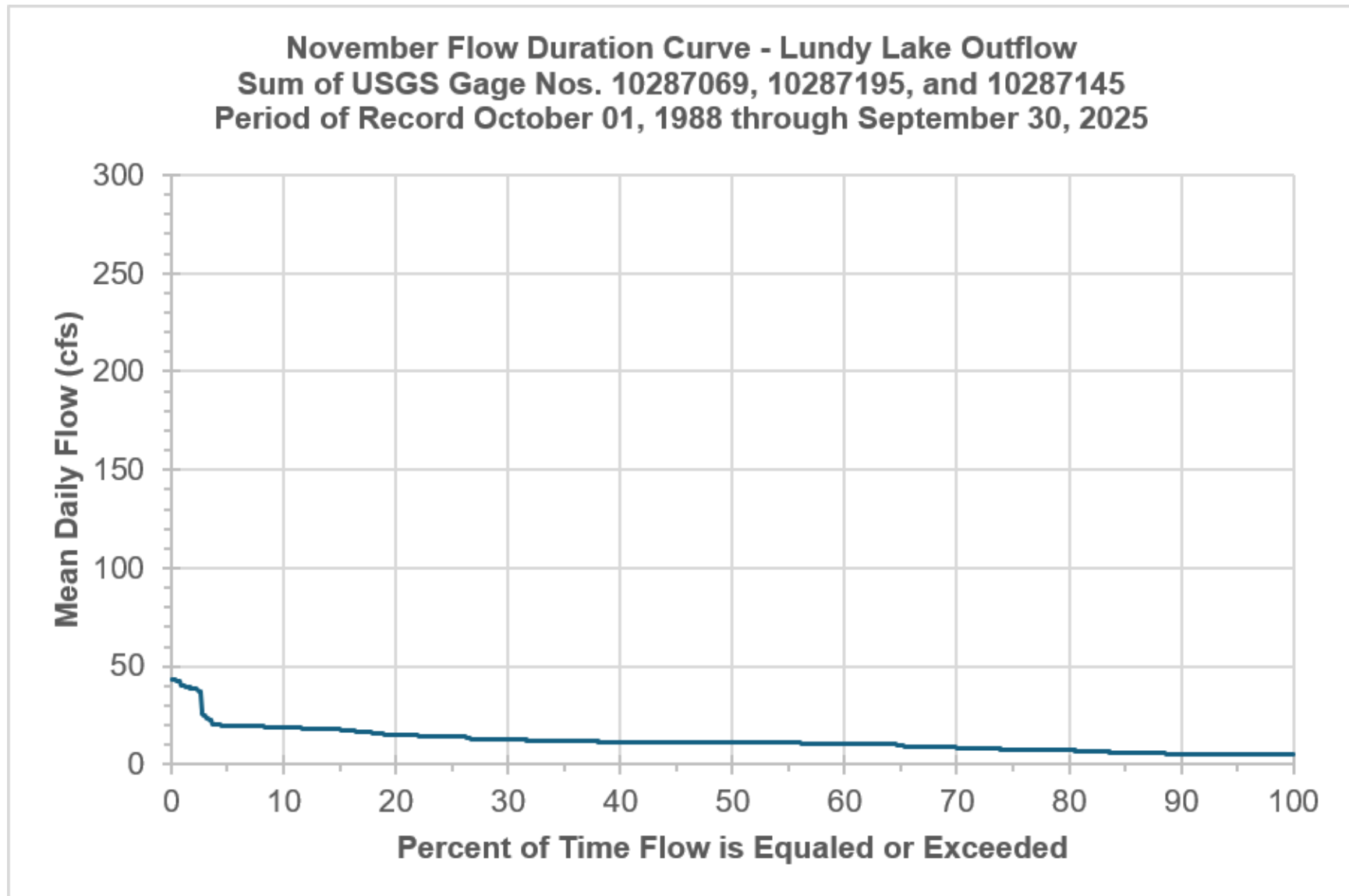


Figure 12. Monthly Flow Duration Curve for Lundy Lake Outflow, November 1988–2025.

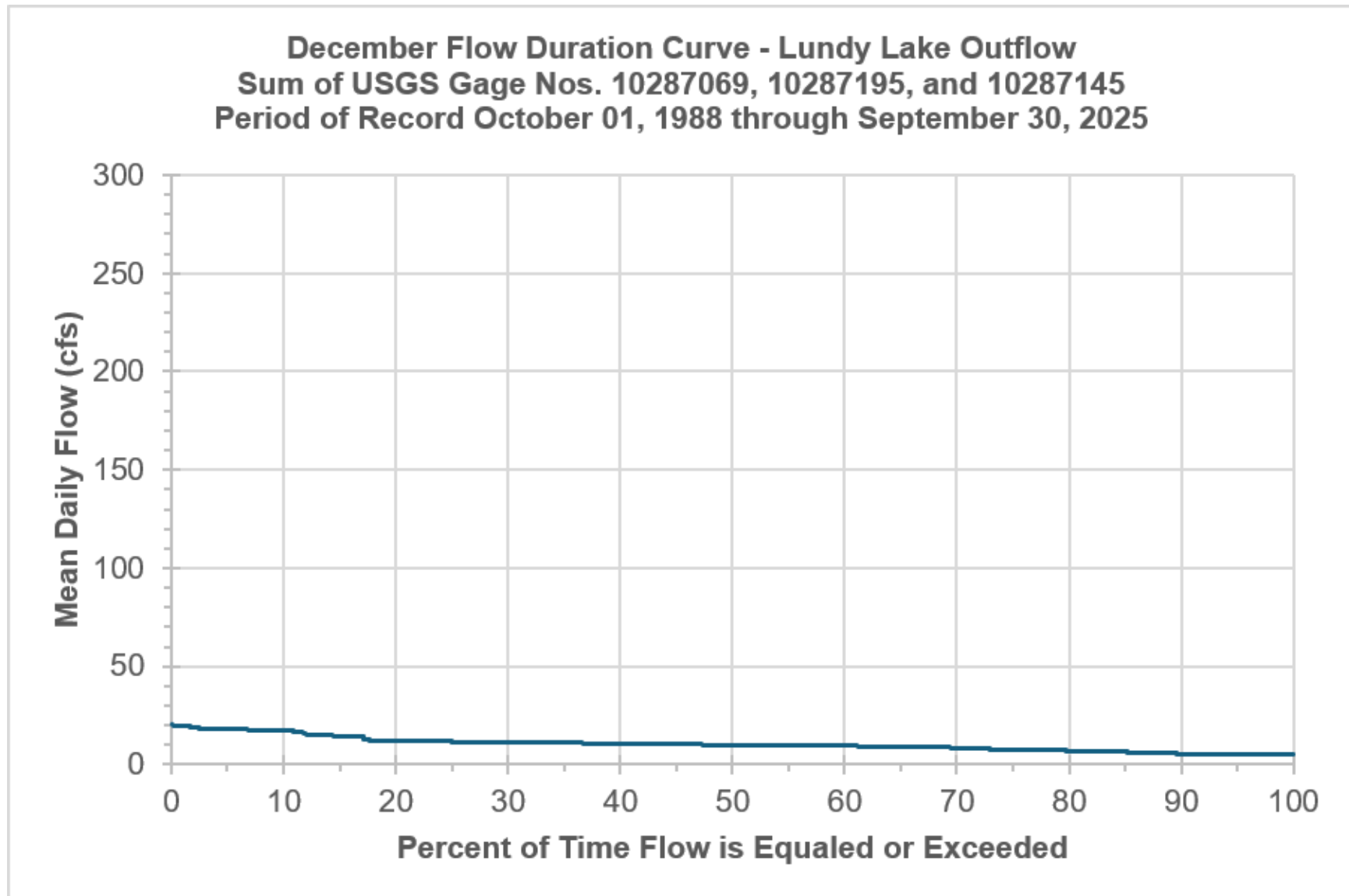


Figure 13. Monthly Flow Duration Curve for Lundy Lake Outflow, December 1988–2025.