Rush Creek Project, FERC Project No. 1389

LAND 1 – Aesthetics Technical Study Report

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List of Acronyms

cfs cubic feet per second

ESI Existing Scenic Integrity

FERC Federal Energy Regulatory Commission

Forest Service United States Forest Service

GPS Global Positioning System

INF Inyo National Forest

KOP Key Observation Point

kV kilovolt

PCT Pacific Crest Trail

Project Rush Creek Project

SCE Southern California Edison

SMS Scenery Management System

SOI Scenic Integrity Objective

SR State Route

TSP Technical Study Plan

TSR Technical Study Report

1 INTRODUCTION

This Technical Study Report (TSR) describes the methods and results associated with implementation of the LAND 1 – Aesthetics Technical Study Plan (TSP) for the Rush Creek Project (Project). The Aesthetics TSP was included in Southern California Edison's (SCE) Revised Study Plan¹ and was approved by the Federal Energy Regulatory Commission (FERC) on October 26, 2022, as part of Study Plan Determination. Specifically, this report describes the methods and results of implementing the Aesthetics TSP.

2 STUDY OBJECTIVES

- Establish Key Observation Points (KOP) from which the Project facilities are visible by the public.
- Document the existing scenic integrity (ESI) of the existing Project facilities on National Forest System land and their associated viewsheds relative to the U.S. Forest Service (Forest Service) scenic integrity objectives (SIO).
- Document the visual condition of the existing Project facilities on private land relative to Mono County goals and policies that pertain to visual resources.
- Document the visual character of Horsetail Falls under different flow conditions.
- Prepare visual renderings of the Project alternatives.

3 STUDY IMPLEMENTATION

Study elements described in the Aesthetics TSP were initiated in 2023. The study elements that have been completed, any deviations or proposed modifications to the study plan, and study elements that are outstanding, are discussed in the following subsections.

3.1 STUDY ELEMENTS COMPLETED

The following study elements were completed in 2023:

- Establish KOPs and describe the landscape character of the Project facility viewsheds.
- Document the ESI of the existing Project facilities relative to Forest Service SIOs.
- Determine consistency of the existing Project facilities with relevant Mono County goals and policies.

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SCE filed a Proposed Study Plan on May 26, 2022 (SCE 2022a). Four comment letters were filed on the Proposed Study Plan; and six study plans were revised. Therefore, SCE filed a Revised Study Plan on September 23, 2022 (SCE 2022b). FERC subsequently issued a Study Plan Determination on October 26, 2022, approving all study plans for the Rush Creek Project (FERC 2022).

- Characterize Horsetail Falls under various flow conditions.
- Prepare visual renderings of Project alternatives.

3.2 VARIANCES FROM THE AESTHETICS TSP

There was one variance to study implementation from the Aesthetics TSP pertaining to characterization of Horsetail Falls under various flow conditions The Aesthetics TSP identified the following target flows for photo documentation: (1) a spill event; (2) 70 to 85 cubic feet per second (cfs); (3) 13 to 20 cfs; (4) 5 to 8 cfs; and (5) 1 cfs (current minimum instream flow release requirement). All these flows were photo documented with the following variations noted:

- a "spill event" was defined as spring runoff conditions with all Project valves and gates open;
- a variety of flows in the 9 to 10 cfs range were photo documented to satisfy the 5 to 8 cfs range flow condition; and
- flows in the 2 cfs range were photo documented to satisfy the minimum flow condition (1 cfs).

3.3 OUTSTANDING STUDY ELEMENTS

There are no outstanding study elements.

4 STUDY AREA AND STUDY SITES

The study area for the visual resource assessment includes the Project facilities identified in Table LAND 1-1 and their associated viewsheds. The study area also includes the Horsetail Falls viewshed.

For the purposes of this study, a viewshed is defined as an area of the landscape that is visible from a particular location or series of points (e.g., an overlook or a trail, respectively). The viewsheds include the primary travel routes and recreation areas from which the existing Project facilities are visible to the public.

5 STUDY APPROACH

Most Project facilities are located on federal land within the Inyo National Forest (INF) and Ansel Adams Wilderness Area, both managed by the Forest Service. The INF Land Management Plan (Forest Service 2019) established SIOs for INF lands using the Forest Service Scenery Management System (SMS; Forest Service 1995).² The SIOs identify the desired level of scenic quality and diversity of a landscape based on physical and sociological characteristics of an area. Therefore, Project facilities located on National

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Forest Service Handbook, Landscape Aesthetics – A Handbook for Scenery Management (Forest Service 1995), describes the Forest Service Scenery Management System (SMS), a system to inventory and analyze aesthetic values of National Forest System land.

Forest System land are assessed with respect to the management objectives established by the INF. Forest Service SIOs do not apply to private land.

The Rush Creek Powerhouse and most of the associated ancillary facilities are located on private land (SCE-owned lands) within Mono County. Project facilities on private lands are assessed relative to the goals and policies outlined in the Mono County General Plan that pertain to visual resources, to the extent these goals and policies apply to the Project.

5.1 ESTABLISH KOPS AND DESCRIBE THE LANDSCAPE CHARACTER OF THE PROJECT FACILITY VIEWSHEDS

Seventeen Project facility KOPs were selected from locations at or adjacent to the Rush Creek Trail and the Pacific Crest Trail during the 2023 field season (July and September). The location of each KOP was recorded using a sub-meter global positioning system (GPS) unit for mapping purposes. To document the viewshed from each KOP at least one photo was taken and a standardized inventory form was completed during the Project visual assessment field study in the summer of 2023. Photos of Horsetail Falls were also captured during the fall of 2024. The standardized inventory form was developed to prompt a consistent descriptive account of the Project facility viewsheds from each KOP in terms of landscape attributes (i.e., forms, lines, colors, and textures that constitute the view); ecological unit descriptions; and scenic attractiveness. The standardized inventory form was shared with INF staff for feedback³ prior to study implementation.

5.2 DOCUMENT THE ESI OF THE EXISTING PROJECT FACILITIES RELATIVE TO FOREST SERVICE SIOS

An ESI rating for each Project facility viewshed was established using the same rating system as used in the SMS for scenic integrity: very high, high, moderate, low, and very low. Using the ESI ratings, the compatibility of Project facilities was assessed with the surrounding landscape SIOs and a determination was made as to whether the Project facilities conform to established applicable Forest Service SIOs for the landscape.

5.3 DETERMINE CONSISTENCY OF THE EXISTING PROJECT FACILITIES WITH RELEVANT MONO COUNTY GOALS AND POLICIES

The Rush Creek Powerhouse and most of the associated ancillary facilities are on private land in Mono County. The landscape character of these Project facilities was assessed from viewpoints along State Route (SR) 158 and their visual character evaluated for consistency with the visual resource goals and policies in the Mono County General Plan (Mono County 2015).

5.4 CHARACTERIZE HORSETAIL FALLS UNDER VARIOUS FLOW CONDITIONS

To characterize Horsetail Falls under various flow conditions, two KOPs were established at locations from which Horsetail Falls is readily visible by the public: one along the east shoulder of SR 158 heading north toward the Project from June Lake and the other from the Rush Creek Trail. Over the course of the 2023 field season (beginning in late May

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³ Personal communication between Adam Barnett, Public Services Staff Officer, Inyo National Forest, and Patricia Sussman, Stantec, July 14, 2023.

2023 and going through the end of October 2023), field staff visited the KOPs to photo document Horsetail Falls under different flow conditions. Field staff also visited the KOPs during the fall of 2024 to capture additional flow conditions not photographed in 2023.

5.5 Prepare Visual Renderings of Project Alternatives

From select representative KOPs, at least two visual renderings (one looking upstream and one looking downstream) of each Project alternative were prepared. Visual renderings were also prepared for the full decommissioning options. The visual renderings prepared included:

- Rush Meadows Dam partial and full removal
- Gem Dam retrofit, partial removal, and full removal
- Agnew Dam partial and full removal

6 STUDY RESULTS

6.1 KOPs and the Landscape Character of Project Facility Viewsheds

Refer to Table LAND 1-2 for a list of the Project facility KOP coordinates, to Appendix A for photographs of Project facility viewsheds from each KOP, and to Map LAND-1 for an illustrative overview of the location of each of the 17 Project facility KOPs in relation to the study area and INF SIOs (where applicable). Maps LAND 1-2a-d provide a more detailed illustration of the location of each KOP in relation to Project facilities. The viewshed from each KOP is described below.

6.1.1 KOP 1, Penstock and Tram Tracks

- GPS Coordinates: 37.7655, -119.13
- Location Description: Rush Creek Trail heading toward Horsetail Falls
- Viewshed Description: Horsetail Falls is the prominent view heading up the trail. Obviously, visible Project facilities include the tram tracks, Agnew 4-kilovolt (kV) line, and penstock/flowline. The Agnew 4-kV line and associated poles are a component of the middleground view. Looking east from the trail into the valley, the developed areas of the June Lake Loop are visible to the south of Silver Lake. The tram tracks and partial views of the penstock/flowline are among the elements in the foreground while walking. Project facilities, while contrasting in line and form with the natural landscape are generally consistent with other landscape colors (not contrasting).

6.1.2 KOP 2, Agnew 4-kV Line

- GPS Coordinates: 37.7628, -119.129
- Location Description: Viewpoint along the Rush Creek Trail with views directly down the Agnew 4-kV line east into the valley.
- Viewshed Description: Steep slope of the mountain to the west and views over the
 valley to the east as the trail climbs toward Horsetail Falls. The slope is rocky talus
 with large granite outcroppings and occasional shrubby vegetation, though there
 are few trees along the trail. The developed background of the valley limits visual
 awareness of facility infrastructure, though the tram tracks and Agnew 4-kV line
 are present at the viewpoint and all along the trail.

6.1.3 KOP 3, Agnew Dam and Ancillary Facilities—View from Downstream

- GPS Coordinates: 37.7593, -119.132
- Location Description: Along the Rush Creek Trail above Rush Creek just east and above Agnew Junction.
- Viewshed Description: From this location perched along the trail above Rush Creek multiple Project facilities are visually prominent within the foreground and middleground, including the flowline, and tram tracks (below the trail), the downstream view of Agnew Dam, stand pipe, valve house, Agnew flume, and various other buildings and infrastructure. While contrasting in line, form and texture with the natural landscape, the weathered historical feel of buildings and of the tram tracks lessen their contrast with the natural setting – a backdrop of high Sierra rocks and mountains.

6.1.4 KOP 4, Agnew Lake and Dam at Shoreline

- GPS Coordinates: 37.7579, -119.132
- Location Description: Directly adjacent to the upstream end of Agnew Dam along the shoreline of the lake.
- Viewshed Description: Views upstream (southwest) are across Agnew Lake toward Gem Dam which is just visible at the top of the drainage (a uniform gray against the red/tan rock and green vegetation). Downstream views are dominated by the foreground of the Agnew Dam, while the boathouse and other ancillary facilities take up most of the visual foreground space when looking toward the Rush Creek Trail. The Agnew Lake motor barge is a prominent visual element when standing at the shoreline looking out across the lake and contrasts sharply in form, line, shape, and color (the barge is red) with the surrounding lake and granite rock. Surrounding mountains rise steeply several thousand feet above the facilities. Shoreline vegetation includes minimal grasses and some shrubs.

6.1.5 KOP 5, Agnew Lake—View from Upstream

- GPS Coordinates: 37.7574, -119.135
- Location Description: Along the Rush Creek Trail above Agnew Lake looking towards the upstream face of Agnew Dam.
- Viewshed Description: The Rush Creek Trail runs mid-slope along the rocky talus
 of the mountain that climbs above Agnew Lake on its northeast shoreline.
 Vegetation is sparse. The white geomembrane of Agnew Dam contrasts sharply
 against the grey and tan of the surrounding rocky environment. A powerline tower
 is visible in the skyline to the north of the dam.

6.1.6 KOP 6, Agnew Lake and Dam—View from Above

- GPS Coordinates: 37.7528, -119.141
- Location Description: Rush Creek Trail at the top of the drainage immediately north of Gem Dam (Gem Dam not visible).
- Viewshed description: Exposed ridgetop with expansive view encompassing all of Agnew Lake to the east. Agnew Dam's white geomembrane is visible at the eastern end of the lake and the red motor barge is a prominent visual element in the lake itself. Swimmers are visible below along the western shoreline of Agnew Lake. Rush Creek Trail and Spooky Meadows Trail are linear features that rise away from the lake to the west along the talus slopes that create the lake basin. Topography and vegetation obstruct any views of Gem Dam to the west.

6.1.7 KOP 7, Gem Dam

- GPS Coordinates: 37.7525, -119.141
- Location Description: Top of the ridge between Gem Lake and Agnew Lake south of Rush Creek Trail.
- Viewshed Description: View from a rocky exposed ridge above Gem Dam approximately one hundred yards south and above the Rush Creek Trail. The entirety of Gem's Dam crest is visible from the ridge as is Rush Creek and many of the ancillary facilities on the downstream side of the dam. The generation facilities are weathered, like the landscape, though the angular forms of the buildings and some of the equipment, especially at the landing area across the other side of the dam, create an industrial sense of place. Dominant landscape elements in the foreground include red and tan rocks, and shrubby vegetation, while the backdrop includes towering mountains to the west. Gem Lake appears as an obvious reservoir with a clear gap of several feet in elevation between the edge of the water and the line of vegetation around its shore.

6.1.8 KOP 8, Gem Dam—View from Upstream

- GPS Coordinates: 37.7546, -119.144
- Location Description: Rush Creek Trail along the north side of Gem Dam just west of the dam itself.
- Viewshed Description: Facing west along the trail Gem Dam's white geomembrane
 is a dominant element of the foreground and middleground spanning the narrow
 mouth of the lake basin. Gem Lake is an obvious reservoir with a defined "bathtub
 ring" even with the water at high elevation. There is no access to the lake itself
 as steep rocky slopes and cliffs scarce of vegetation separate the trail from
 the shoreline.

6.1.9 KOP 9, Gem Lake

- GPS Coordinates: 37.7535, -119.148
- Location Description: View across Gem Lake from a mid-point of the trail along the northern shoreline.
- Viewshed Description: Viewpoint of a large portion of Gem Lake to the east, south and west. The Sierra crest is visible to the west and the mountains that constitute the basin of Gem Lake visible in all directions. No Project facilities are visible, however, the "bathtub ring" around the lake indicates the viewshed is not of a natural lake basin.

6.1.10 KOP 10, Rush Meadows Dam—View from Downstream

- GPS Coordinates: 37.7512, -119.181
- Location Description: Along Rush Creek Trail downstream of Rush Meadows Dam

 initial view of dam.
- Viewshed Description: Foreground is dominated by the face of the dam which
 obstructs views of the mountains to the west beyond the dam. The dam and its
 notch are visible as is Rush Creek as it passes through the notch. The surrounding
 environment is rocky high Sierra with vegetation consisting of various conifers and
 some low grasses and shrubs. The color of the dam is consistent with surrounding
 colors: gray, tan and weathered.

6.1.11 KOP 11, Rush Meadows Dam—View from Weber Lake Trail

- GPS Coordinates: 37.7501, -119.182
- Location Description: View of downstream face of Rush Meadows Dam from Weber Lake Trail.

 Viewshed Description: The entire length of the upstream face of Rush Meadows Dam dominates the view. The upstream face of the dam, covered by the geomembrane is starkly white against a rocky gray backdrop. The notch in the dam is clearly visible as is the railing across the dam's crest.

6.1.12 KOP 12, Rush Meadows Dam

- GPS Coordinates: 37.7517, -119.181
- Location Description: Rush Creek Trail adjacent and across from Rush Meadows Dam as the trail climbs from the dam base to Waugh Lake.
- Viewshed Description: The whole of the downstream face of the dam (including the notch) is the dominant visible element in the foreground. Ancillary infrastructure including the gage house, equipment shed, and valve house are also visible. Some of the lake and most of the Sierra crest (Mount Dana, Rodgers Peak and Mount Lyle) are the visible backdrop behind the dam. The dam itself, though an obvious visual intrusion, matches the weathered colors of the landscape. The yellow slide gates at the crest of the dam contrast with the colors of the landscape.

6.1.13 KOP 13, Waugh Lake—View from Rush Creek Trail Near Dam

- GPS Coordinates: 37.7519, -119.182
- Location Description: View from the shoreline area of Waugh Lake just beyond Rush Meadows Dam – looking west towards the Sierra crest.
- Viewshed Description: The view is expansive across the Waugh lakebed which
 comprises the foreground and middleground of the view while the high peaks of
 the Sierra crest dominate the backdrop. The lakebed itself appears as a drained
 reservoir with silty mud and meandering creek conditions visible across to the far
 side of the lake. Close to the location of the KOP, shallow riffles indicate the current
 of Rush Creek as it travels toward the notch in Rush Meadows Dam.

6.1.14 KOP 14, Rush Meadows Dam—View from Upstream

- GPS Coordinates: 37.7528, -119.185
- Location Description: Rush Creek Trail upstream of Rush Meadows Dam
- Viewshed Description: Dam is visible to the west heading down the trail. The white
 of the geomembrane is lighter in color than the surrounding rocks. The lake is low
 compared to the top of the dam and at lower water levels, the lake appears dry
 and a "bathtub ring" is visible. Sparse vegetation along the northern shoreline
 (south facing shoreline) allows for mostly unobstructed views.

6.1.15 KOP 15, Waugh Lake—Northern Shoreline

- GPS Coordinates: 37.7529, -119.195
- Location Description: KOP is on the far northern shoreline of Waugh Lake (just south of the Rush Creek Trail) towards its west end.
- Viewshed Description: Looking upstream, the silty lakebed of Waugh Lake is replaced by granite slabs of rock and a defined creek channel (mostly dry in September 2023). The high peaks of the Sierra crest dominate the upstream backdrop. Vegetation at the shoreline consists of scattered conifers (mostly lodgepole pine). Downstream the view during early summer (peak runoff) varies dramatically compared to later in the season after most of the snow has melted. During the early season, the lake appears nearly full with no lakebed visible and the crest of the dam just visible as a linear flat feature, distinctive compared to the rounded mountainous terrain on either side of the drainage. Later in the season the brown silt of the lakebed dominates the foreground and the whole of Rush Meadows Dam is visible at the eastern end, its white geomembrane contrasting starkly with the blue and brown of the lakebed and the rocky gray mountains beyond.

6.1.16 KOP 16, Waugh Lake—Western End

- GPS Coordinates: 37.7499, -119.201
- Location Description: Western end of Waugh Lake, just downstream from the inlet of Rush Creek to the lakebed.
- Viewshed Description: The upstream view is of the Rush Creek inlet to the lake.
 Coniferous forests ring the lakebed to the west and on either side of the inlet. The
 Sierra crest remains the prominent backdrop. Where the water has receded,
 stumps are visible scatted around the shoreline. Stranded rocky outcroppings
 create varied topography across the lakebed at lower water elevations. In areas of
 permanently exposed sediment uniform stands of young lodgepole pines are
 well established.

6.1.17 KOP 17, Waugh Lake from the Pacific Crest Trail

- GPS Coordinates: 37.7468, -119.215
- Location Description: Viewpoint along the Pacific Crest Trail (PCT) towards Waugh Lake.
- Viewshed Description: The PCT traverses the mountains high above Waugh Lake and the view is expansive to the east toward the Great Basin encompassing Waugh Lake in the middleground. Rush Meadows Dam is visible from the PCT as a uniform linear feature at the edge of the lakebed and the lakebed itself is

distinctive as a large and relatively disturbed area compared to the mature surrounding landscape.

6.2 EXISTING SCENIC INTEGRITY OF THE EXISTING PROJECT FACILITIES RELATIVE TO FOREST SCENIC INTEGRITY OBJECTIVES

6.2.1 Scenic Integrity Objective Ratings

In 1995, the Forest Service published *Landscape Aesthetics: A Handbook for Scenery Management*, which is the guidance document for the SMS. SIOs were assigned to the management areas that constitute the INF as a part of the most recent INF Land Management Plan update completed in 2019. SIO ratings range from very high to very low. Descriptions of each scenic integrity ratings are defined in the handbook as follows:

- Very high scenic integrity refers to landscapes where the valued landscape character "is" intact with only minute, if any, deviations. The existing landscape character and sense of place is expressed at the highest possible level.
- High scenic integrity refers to landscapes where the valued landscape character "appears" intact. Deviations may be present but must repeat the form, line, color, texture, and pattern common to the landscape character so completely and at such scale that they are not evident.
- Moderate scenic integrity refers to landscapes where the valued landscape character "appears slightly altered." Noticeable deviations must remain visually subordinate to the landscape character being viewed.
- Low scenic integrity refers to landscapes where the valued landscape character "appears moderately altered." Deviations begin to dominate the valued landscape character being viewed, but they borrow valued attributes such as size, shape, edge effect and pattern of natural openings, vegetative type changes, or architectural styles outside the landscape being viewed. They should not only appear as valued character outside the landscape being viewed but compatible or complementary to the character within.
- Very low scenic integrity refers to landscapes where the valued landscape character "appears heavily altered." Deviations may strongly dominate the valued landscape character. They may not borrow from valued attributes such as size, shape, edge effect and pattern of natural openings, vegetative type changes, or architectural styles within or outside the landscape being viewed. However, deviations must be shaped and blended with the natural terrain (landforms) so that elements such as unnatural edges, roads, landings, and structures do not dominate the composition.

The SIO for all lands within the Ansel Adams Wilderness is very high. All other National Forest System lands in the vicinity of the Project are designated as having a high SIO. Table LAND 1-1 identifies the above-ground Project facilities and the SIO associated with

the landscapes in which the facilities are located. Map LAND 1-1 illustrates the SIO for each management area of the INF in the study area.

6.2.2 Existing Scenic Integrity Ratings

Based on the landscape character assessed from each Project facility viewshed KOP, an ESI rating was established for each Project facility using the same rating system as used in the SMS for scenic integrity. While Project facilities were found to be non-compatible with Forest Service landscape SIOs in which they are located, Project facilities were originally constructed between 1915 and 1918, which pre-dates establishment of a Forest Service system for assigning visual management objectives to National Forest System land.⁴ Therefore, while informative, an evaluation of the compatibility of Project facilities with Forest Service SIOs is not applicable.

In addition, Project facilities were constructed before Congress' establishment of the Ansel Adams Wilderness Area. Ansel Adams Wilderness was established as part of the original Wilderness Act in 1964 (at that time, it was designated as the Minarets Wilderness). When the Wilderness Act was enacted, it was well understood that the protection for existing private rights would extend to federally licensed hydropower projects. During the prior Project relicensing in the 1990s, both FERC and the Forest Service accepted the Project facilities as "non-conforming uses" because they were built before the establishment of the wilderness.

Refer to Table LAND 1-3 for the ESI rating of each Project facility and the associated SIO compatibility determination.

6.3 Consistency of the Existing Project Facilities With Relevant Mono County Goals and Policies

Visual resource goals and policies from the Mono County General Plan (2015) include:

- Goal 13. Regulate use of other energy resources for power generation to ensure that environmental impacts and impacts to public health and safety are minimal.
 - Objective 13.B. Power generation facilities shall not adversely impact the visual resources, recreational resources, and noise environment in Mono County.
- Goal 20. Protect and enhance the visual resources and landscapes of Mono County.
 - Objective 20.A. Maintain and enhance visual resources in the county.
 - Policy 20.A.3 Preserve the visual identity of areas outside communities.
 - Policy 20.A.5. Restore visually degraded areas when possible.

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⁴ The first Forest Service system for assigning visual quality management objectives to National Forest System land was the Visual Management System established by the Forest Service in 1974. For most National Forests, this original system has been replaced with the 1995 SMS.

The Rush Creek Powerhouse and most of the powerhouse ancillary facilities are located on land owned by SCE directly adjacent to SR 158. KOPs of the powerhouse complex were not established along the highway, but views of the powerhouse complex when approaching from the north along the highway, from directly in front of the complex, and from the south along the highway were evaluated. The Rush Creek Powerhouse and ancillary facilities, including garages, machine shop, and pumphouse, are the most substantive foreground Project features of the landscape when directly facing the complex from the highway. Horsetail Falls and the mountains behind the falls are visible as a backdrop to the powerhouse complex and constitute the middleground and background of the view. The complex is not obvious when approaching from the north due to substantive vegetation screening. When approaching from the south, vegetation also screens views of the powerhouse complex, though not as completely. As a whole the powerhouse complex is generally visible for less than a few seconds by passing cars. While the shape, line, and some textures (e.g., metal roofs) of visible facilities in the complex contrast with the surrounding natural landscape, the colors are generally similar in shade to the natural colors in the area including white, tan, gray, brick-red, and brown. Neither the powerhouse itself nor any SCE-owned buildings within the complex are inconsistent with the visual resource goals and policies of the Mono County General Plan.

6.4 Horsetail Falls Under Various Flow Conditions

Horsetail Falls is a water feature along Rush Creek downstream of Agnew Dam where the creek falls and cascades approximately 500 vertical feet. Horsetail Falls is a dramatic and eye-catching component of the middleground view from SR 158 at high flows and an eye-catching, though less dramatic, visual phenomena at lower flows. At lower flows, time-of-day, and weather conditions (e.g., overcast or clear) may reduce or enhance the view of the falls from the highway. From the Rush Creek Trail, the falls are a larger component of the overall viewshed. While spectacular at high flows, they are an outstanding feature of the landscape from the trail even at 2 cfs.

To characterize Horsetail Falls under various flow conditions, two KOPs were established at locations from which Horsetail Falls is readily visible by the public: one along the east-shoulder of SR 158 heading north toward the Project from June Lake and the other from the Rush Creek Trail. Refer to Table LAND 1-2 for the Horsetail Falls KOP coordinates and to Map LAND 1-1 for an illustrative overview of the locations of the two KOPs.

Over the course of the 2023 and 2024 field season field staff visited the KOPs to photo document Horsetail Falls under different flow conditions. In some cases, coordination with SCE operations was necessary to organize releases commensurate with the desired flow condition because the flow condition was otherwise not present or only present for a short time period. For example, flows in the 13-to 20-cfs range occurred on just 2 days during the 2023 field season—October 11 and October 19—while flows in the 70-to 85-cfs range over the falls occurred on just 1 day—August 2, 2023. Because of the short period during which these flows occurred, field staff were not able to mobilize quickly enough to document flows under these two conditions during the 2023 season. Instead, field staff coordinated with SCE operations to arrange for these two flow conditions in October of

2024. Appendix B is a compilation of photos of Horsetail Falls from the two established KOPs at each of the following flows:

- 327 cfs
- 284 cfs
- 76 cfs
- 18 cfs
- 10-12 cfs
- 9.5 cfs
- 2.6 cfs
- 2.10 cfs

The hydrology model developed as part of the AQ 2 – Hydrology study was used to determine the frequency of various flow conditions over Horsetail Falls during the recreation season (May 1 to September 30) from 1990 to 2023. Although there is significant year-to-year variation across six flow categories, ranging from above 200 cfs to below 5 cfs, the model shows that the most frequent flow condition over Horsetail Falls, regardless of water year type, is less than 5 cfs. Specifically, during the recreation season, flows are below 5 cfs:

- 73% of the time in dry years
- 56% of the time in average years
- 38% of the time in wet years

Table LAND 1-4 summarizes the flow frequency results across these six flow categories for dry, average, and wet years from 1990 to 2023.

6.5 VISUAL RENDERINGS OF PROJECT ALTERNATIVES

From select representative KOPs, at least two visual renderings (one looking upstream and one looking downstream) of each Project alternative were prepared. The visual renderings prepared include:

- Rush Meadows Dam partial and full removal
- Gem Dam retrofit, partial removal, and full removal
- Agnew Dam partial and full removal

Refer to Appendix C for the visual renderings. The compatibility of the Project alternatives in relation to the Forest Service SIOs for the landscape are evaluated in the license application.

7 REFERENCES

- FERC (Federal Energy Regulatory Commission). 2022. Rush Creek Hydroelectric Project (FERC Project No. 1389). Study Plan Determination. October.
- Forest Service (U.S. Forest Service). 1974. National Forest Landscape Management, Volume 2. Chapter 1, The Visual Management System. Agriculture Handbook Number 462. (April).
- ——. 1995. Landscape Aesthetics A Handbook for Scenery Management. Agricultural Handbook Number 701. December.
- ——. 2019. Land Management Plan for the Inyo National Forest. September.
- Mono County. 2015. Mono County General Plan Update. Conservation/Open Space Element. Available at: https://monocounty.ca.gov/planning/page/general-plan.
- SCE (Southern California Edison Company). 2022a. Rush Creek Hydroelectric Project (FERC Project No. 1389) Proposed Study Plan. May.
- ——. 2022b. Rush Creek Hydroelectric Project (FERC Project No. 1389) Revised Study Plan. September.

TABLES

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Table LAND 1-1. Rush Creek Project Facilities and Scenic Integrity Objectives

Project Facility	Land Ownership/ Jurisdiction	Scenic Integrity Objective (as applicable)
Rush Meadows	Dam Area	•
Dams		
Rush Meadows Dam	Forest Service	Very high
Reservoirs		•
Waugh Lake	Forest Service	Very high
Valve House		
Rush Meadows Dam Valve House	Forest Service	Very high
Stream Gages		
Rush Creek below Rush Meadows (Waugh Lake) (U.S. Geological Survey [USGS] No. 10287262; SCE No. 359r)	Forest Service	Very high
Reservoir Gages		
Waugh Lake (USGS No. 10287260; SCE No. 359)	Forest Service	Very high
Trails		•
Rush Meadows Dam Access Trail	Forest Service	Very high
Rush Meadows Dam/Waugh Lake Ancillary and Su	pport Facilities	•
Rush Meadows Dam Equipment Shed	Forest Service	Very high
Rush Meadows Dam Gage House	Forest Service	Very high
Rush Meadows Dam Solar Facility	Forest Service	Very high
Gem Dam	Area	·
Dams		
Gem Dam	Forest Service	High
Reservoirs	,	•
Gem Lake	Forest Service	Very high
Flowline		•
Gem Dam to Agnew Junction Flowline	Forest Service	High
Valve House		
Gem Valve House and Cabin	Forest Service	High
Gem Dam Arch 8 Valve House	Forest Service	High
Gem Flowline Valve House	Forest Service	High
Stream Gages		
Rush Creek below Gem Lake (USGS No. 10287281; SCE No. 352r)	Forest Service	High

Project Facility	Land Ownership/ Jurisdiction	Scenic Integrity Objective (as applicable)
Reservoir Gages		
Gem Lake (USGS No. 10287280; SCE No. 352)	Forest Service	High
Communication Lines		
Communication Line from Rush Creek Powerhouse to Gem Lake Dam	Forest Service	High
Communication Line from Gem Valve House to Arch 8 Valve House	Forest Service	High
Communication Line from Gem Tram Hoist House to Gem Valve House	Forest Service	High
Trams and Hoist Houses		
Gem Tram	Forest Service	High
Gem Tram Hoist House	Forest Service	High
Gem Tram Lower/Upper Landing	Forest Service	High
Trails		
Lower Gem Dam Access Trail	Forest Service	High
Gem Dam Arch 8 Access Trail	Forest Service	High
Upper Gem Dam Access Trail	Forest Service	High
Gem Dam/Lake Ancillary and Support Facilities		
Gem Lake Dock	Forest Service	High
Gem Lake Motor Barge	Forest Service	High
Gem Bunkhouse	Forest Service	High
Gem Outhouse	Forest Service	High
Gem Cookhouse	Forest Service	High
Gem Dam Compressor Shed	Forest Service	High
Gem Dam Storage Shed	Forest Service	High
Gem Dam Overhead Hoist House for Dam Length	Forest Service	High
Gem Dam Overhead Hoist House	Forest Service	High
Gem Fish Release Footbridge	Forest Service	High
Gem Tram Landing Footbridge	Forest Service	High
Gem Tram Bridge	Forest Service	High
Gem Weather Station	Forest Service	High
Gem Satellite Dish	Forest Service	High
Gem Solar Facility	Forest Service	High
Gem Valve House Tunnel	Forest Service	High

Project Facility	Land Ownership/ Jurisdiction	Scenic Integrity Objective (as applicable)
Agnew Dar	n Area	
Dams		
Agnew Dam	Forest Service	High
Reservoirs		
Agnew Lake	Forest Service	High
Flowline		
Agnew Dam to Agnew Junction Flowline	Forest Service	High
Valve House		
Agnew Junction (Valve House and Stand Pipe)	Forest Service	High
Agnew Dam Valve House	Forest Service	High
Stream Gages		
Rush Creek below Agnew Lake (USGS No. 10287289; SCE No. 357)	Forest Service	High
Reservoir Gages		
Agnew Lake (USGS No. 10287285; SCE No. 351)	Forest Service	High
Power Lines		
4-kV Rush Creek Powerhouse to Agnew Dam Power Line	Forest Service	High
4-kV Agnew Lake Dam Power Line	Forest Service	High
4-kV Upper Agnew Boat Dock Power Line (non-operational)	Forest Service	High
Communication Lines		
Communication Line from Agnew Hoist House to Agnew Boathouse	Forest Service	High
Trams and Hoist Houses	•	•
Agnew Tram	Forest Service	High (the portion that is within Forest Service jurisdiction)
Agnew Tram Hoist House	Forest Service	High
Agnew Tram Landing	Forest Service	High
Trails	•	•
Agnew Stream Gage Access Trail	Forest Service	High
Agnew Dam/Lake Ancillary and Support Facilities		
Lower Agnew Lake Boathouse/Dock	Forest Service	High
Upper Agnew Lake Boathouse /Dock	Forest Service	High

Project Facility	Land Ownership/ Jurisdiction	Scenic Integrity Objective (as applicable)
Agnew Lake Motor Barge	Forest Service	High
Agnew Cabin	Forest Service	High
Agnew Weather Station	Forest Service	High
Agnew Flume (downstream of Agnew Dam)	Forest Service	High
Rush Creek Pow	erhouse Area	
Penstocks		
Agnew Junction to Rush Creek Powerhouse Penstock (No. 1)	SCE & Forest Service	High (the portion that is within Forest Service jurisdiction)
Agnew Junction to Rush Creek Powerhouse Penstock (No. 2)	SCE & Forest Service	High (the portion that is within Forest Service jurisdiction)
Powerhouse	•	
Rush Creek Powerhouse	SCE	NA
Gages		
Rush Creek Powerhouse (USGS No. 10287300; SCE No. 367)	SCE	NA
Transmission Lines		
2.4-kV Switchyard to Powerhouse Transmission Line	SCE	NA
Powerhouse Ancillary and Support Facilities		
Rush Creek Powerhouse Complex Access Road	SCE	NA
Cottages (2)	SCE	NA
Garages (4)	SCE	NA
Warehouse and Dock	SCE	NA
Machine Shop	SCE	NA
Pump House	SCE	NA
Woodshed (2)	SCE	NA
Helicopter Landing Site	SCE	NA
Tank (propane)	SCE	NA
Bridge over Powerhouse Tailrace	SCE	NA
Bridge over Rush Creek	SCE	NA

Source: Forest Service 2019

Table LAND 1-2. Key Observation Point Coordinates

КОР	Coordinates (Latitude, Longitude)
KOP 1	37.7655, -119.129
KOP 2	37.7628, -119.129
KOP 3	37.7593, -119.132
KOP 4	37.7579, -119.132
KOP 5	37.7574, -119.135
KOP 6	37.7528, -119.141
KOP 7	37.7525, -119.141
KOP 8	37.7546, -119.144
KOP 9	37.7535, -119.148
KOP 10	37.7512, -119.181
KOP 11	37.7501, -119.182
KOP 12	37.7517, -119.181
KOP 13	37.7519, -119.182
KOP 14	37.7528, -119.185
KOP 15	37.7529, -119.195
KOP 16	37.7499, -119.201
KOP 17	37.7468, -119.215
Horsetail Falls KOP 1 – from SR 158	37.76475, -119.11748
Horsetail Falls KOP 2 – from Rush Creek Trail	37.767569, -119.128193

Table LAND 1-3. Existing Scenic Integrity Ratings and Scenic Integrity Objectives Compatibility Determination

Project Facility	Scenic Integrity Objective (as applicable)	Existing Scenic Integrity Rating	Conformity to Scenic Integrity Objective
	Rush Meadows	Dam	
Dams			
Rush Meadows Dam	Very high	Low	No
Reservoirs			
Waugh Lake	Very high	Low	No
Valve House			
Rush Meadows Dam Valve House	Very high	Low	No
Stream Gages			
Rush Creek below Rush Meadows (Waugh Lake) (USGS No. 10287262; SCE No. 359r)	Very high	Not obviously visible	NA
Reservoir Gages			
Waugh Lake (USGS No. 10287260; SCE No. 359)	Very high	Not obviously visible	NA
Trails			
Rush Meadows Dam Access Trail	Very high	High	No
Rush Meadows Dam/Waugh La	ke Ancillary and Supp	ort Facilities	
Rush Meadows Dam Equipment Shed	Very high	Low	No
Rush Meadows Dam Gage House	Very high	Low	No
Rush Meadows Dam Solar Facility	Very high	Low	No
	Gem Dam		
Dams			
Gem Dam	High	Low	No
Reservoirs			
Gem Lake	Very high	High	No
Flowline			
Gem Dam to Agnew Junction Flowline	High	Moderate	No

Project Facility	Scenic Integrity Objective (as applicable)	Existing Scenic Integrity Rating	Conformity to Scenic Integrity Objective
Valve House			
Gem Valve House and Cabin	High	Moderate	No
Gem Dam Arch 8 Valve House	High	Moderate	No
Gem Flowline Valve House	High	Moderate	No
Stream Gages			
Rush Creek below Gem Lake (USGS No. 10287281; SCE No. 352r)	High	Low	No
Reservoir Gages			
Gem Lake (USGS No. 10287280; SCE No. 352)	High	Not obviously visible	NA
Communication Lines			
Communication Line from Rush Creek Powerhouse to Gem Lake Dam	High	Low	No
Communication Line from Gem Valve House to Arch 8 Valve House	High	Low	No
Communication Line from Gem Tram Hoist House to Gem Valve House	High	Low	No
Trams and Hoist Houses			
Gem Tram	High	Low	No
Gem Tram Hoist House	High	Low	No
Gem Tram Lower/Upper Landing	High	Low	No
Trails			
Lower Gem Dam Access Trail	High	High	Yes
Gem Dam Arch 8 Access Trail	High	High	Yes
Upper Gem Dam Access Trail	High	High	Yes
Gem Dam/Lake Ancillary and S	upport Facilities		
Gem Lake Dock	High	Not obviously visible	NA
Gem Lake Motor Barge	High	Low	No
Gem Bunkhouse	High	Moderate	No

Project Facility	Scenic Integrity Objective (as applicable)	Existing Scenic Integrity Rating	Conformity to Scenic Integrity Objective
Gem Outhouse	High	Moderate	No
Gem Cookhouse	High	Moderate	No
Gem Dam Compressor Shed	High	Low	No
Gem Dam Storage Shed	High	Low	No
Gem Dam Overhead Hoist House for Dam Length	High	Low	No
Gem Dam Overhead Hoist House	High	Low	No
Gem Fish Release Footbridge	High	Moderate	No
Gem Tram Landing Footbridge	High	Moderate	No
Gem Tram Bridge	High	Moderate	No
Gem Weather Station	High	Low	No
Gem Satellite Dish	High	Low	No
Gem Solar Facility	High	Low	No
Gem Valve House Tunnel	High	Low	No
	Agnew Dar	n	
Dams			
Agnew Dam	High	Low	No
Reservoirs			
Agnew Lake	High	Moderate	No
Flowline			
Agnew Dam to Agnew Junction Flowline	High	Low	No
Valve House			
Agnew Junction (Valve House and Stand Pipe)	High	Low	No
Agnew Dam Valve House	High	Low	No
Stream Gages			
Rush Creek below Agnew Lake (USGS No. 10287289; SCE No. 357)	High	Not obviously visible	NA
Reservoir Gages		,	
Agnew Lake (USGS No. 10287285; SCE No. 351)	High	Not obviously visible	NA

Project Facility	Scenic Integrity Objective (as applicable)	Existing Scenic Integrity Rating	Conformity to Scenic Integrity Objective				
Power Lines							
4-kV Rush Creek Powerhouse to Agnew Dam Power Line	High	Low	No				
4-kV Agnew Lake Dam Power Line	High	Low	No				
4-kV Upper Agnew Boat Dock Power Line (non- operational)	High	Low	No				
Communication Lines							
Communication Line from Agnew Hoist House to Agnew Boathouse	High	Low	No				
Trams and Hoist Houses							
Agnew Tram	High (the portion that is within Forest Service jurisdiction)	Low	No				
Agnew Tram Hoist House	High	Low	No				
Agnew Tram Landing	High	Low	No				
Trails							
Agnew Stream Gage Access Trail	High	High	Yes				
Agnew Dam/Lake Ancillary and Support Facilities							
Lower Agnew Lake Boathouse/ Dock	High	Low	No				
Upper Agnew Lake Boathouse/ Dock	High	Low	No				
Agnew Lake Motor Barge	High	Low	No				
Agnew Cabin	High	Low	No				
Agnew Weather Station	High	Low	No				
Agnew Flume (downstream of Agnew Dam)	High	Low No					
Rush Creek Powerhouse Area	High	Low	No				

Project Facility	Scenic Integrity Objective (as applicable)	Existing Scenic Integrity Rating	Conformity to Scenic Integrity Objective				
Rush Creek Powerhouse Area							
Penstocks							
Agnew Junction to Rush Creek Powerhouse Penstock (No. 1)	High (the portion that is within Forest Service Jurisdiction)	Low	No				
Agnew Junction to Rush Creek Powerhouse Penstock (No. 2)	High (the portion that is within Forest Service Jurisdiction)	Low	No				
Powerhouse							
Rush Creek Powerhouse	NA	NA	NA				
Gages							
Rush Creek Powerhouse (USGS No. 10287300; SCE No. 367)	NA	NA	NA				
Transmission Lines							
2.4-kV Switchyard to Powerhouse Transmission Line	NA	NA	NA				
Powerhouse Ancillary and Support Facilities							
Rush Creek Powerhouse Complex Access Road	NA	NA	NA				
Cottages (2)	NA	NA	NA				
Garages (4)	NA	NA	NA				
Warehouse and Dock	NA	NA	NA				
Machine Shop	NA	NA	NA				
Pump House	NA	NA	NA				
Woodshed (2)	NA	NA	NA				
Helicopter Landing Site	NA	NA	NA				
Tank (propane)	NA	NA	NA				
Bridge over Powerhouse Tailrace	NA	NA	NA				
Bridge over Rush Creek	NA	NA	NA				

Notes:

As discussed in Section 6.2.2, while an evaluation of Project facilities with the landscape SIOs in which they are located is informative, because Project facilities were originally constructed between 1915 and 1918, well before the establishment of the Forest Service system for assigning visual management objectives to National Forest System land, evaluation of the compatibility of Project facilities with Forest Service SIOs is not applicable.

None of the facilities associated with the Rush Creek Powerhouse area are on Forest Service lands, and therefore SIO designations do not apply.

Table LAND 1-4. Frequency of Various Flow Conditions Over Horsetail Falls May 1 – September 30

Flow Cotogory	Average No. Days/Year		
Flow Category	Dry	Average	Wet
> 200 cfs	0.0	0.9	29.4
100-200 cfs	0.5	6.1	17.8
50-100 cfs	1.7	11.9	11.4
15-50 cfs	3.4	13.0	9.2
5-15 cfs	36.5	34.9	26.8
< 5	111.0	86.1	58.5

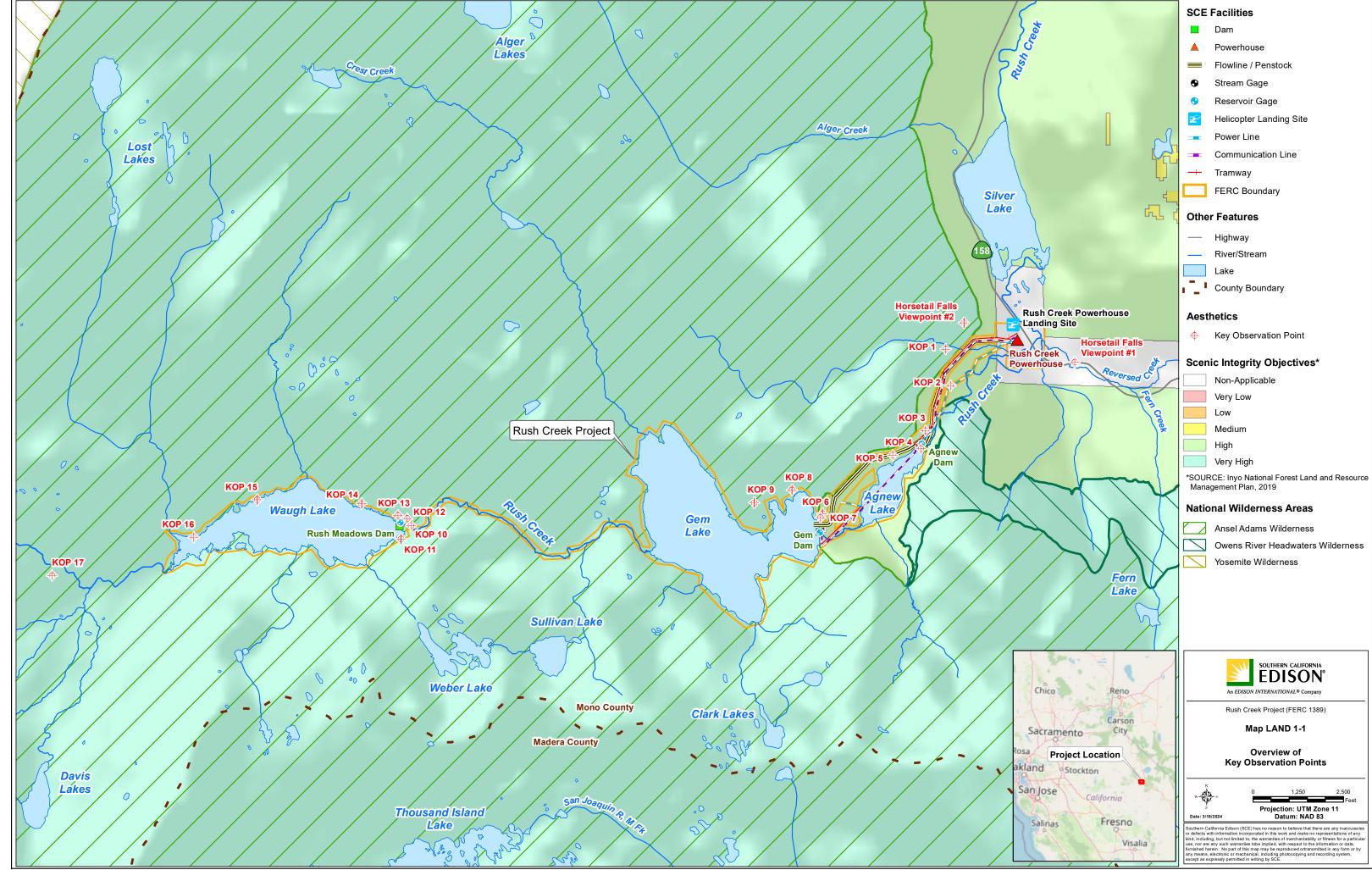
Notes:

Based on modeled period 1990-2023. Refer to the AQ 2 – Hydrology TSR for more information about the hydrology model and data sources.

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MAPS

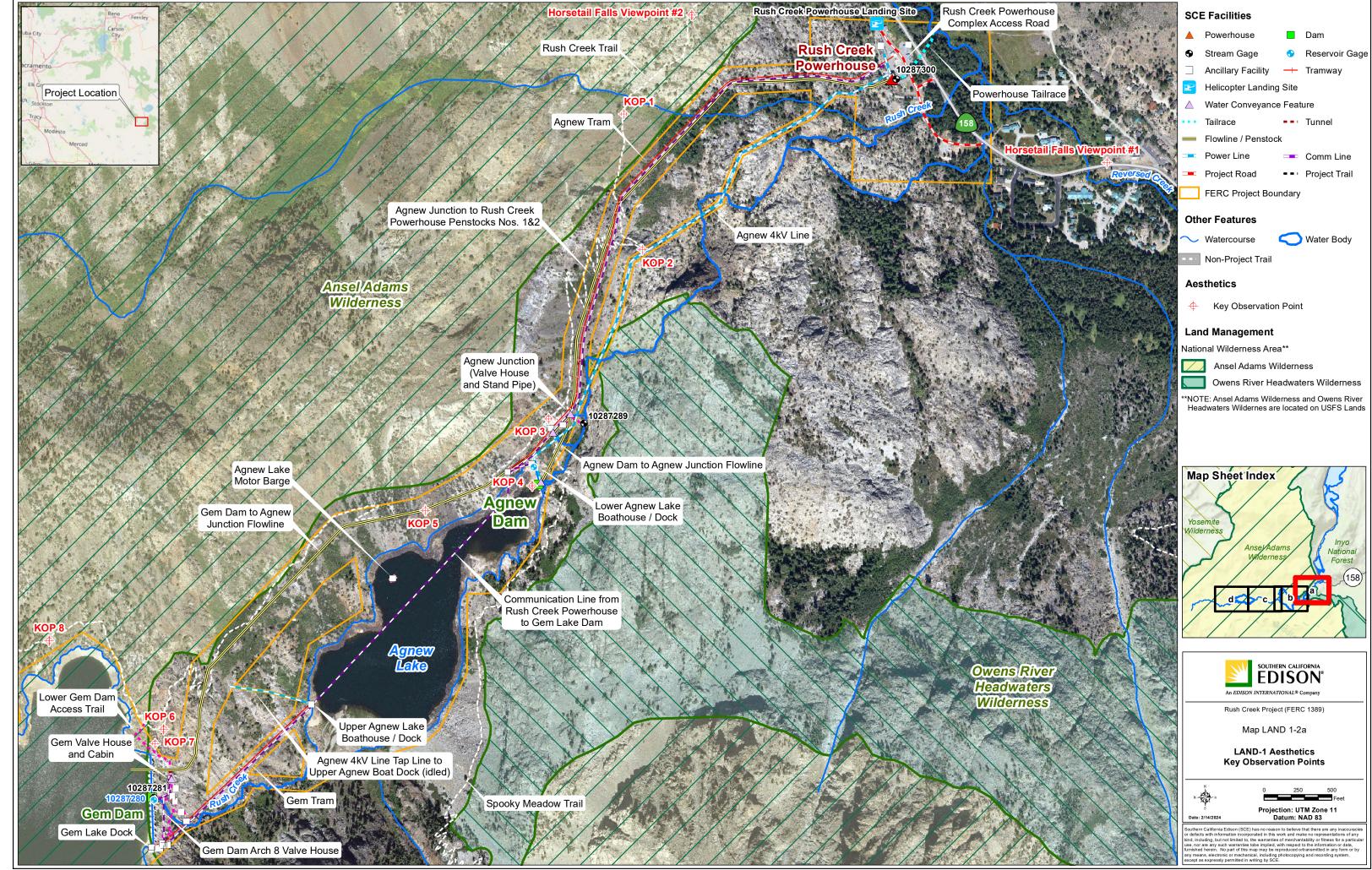
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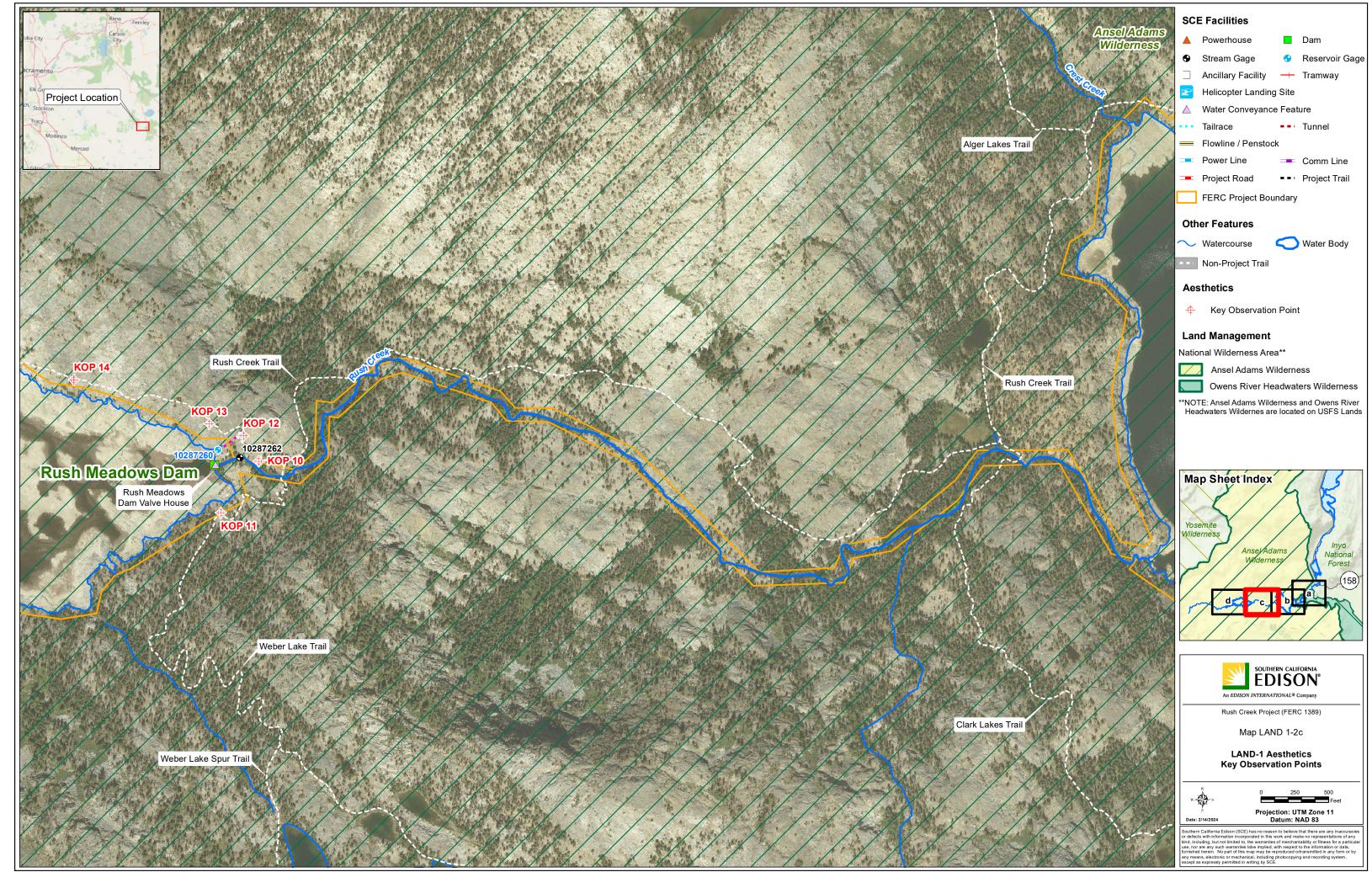
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Technical Study Report: LAND 1 – Aesthetics

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Technical Study Report: LAND 1 – Aesthetics

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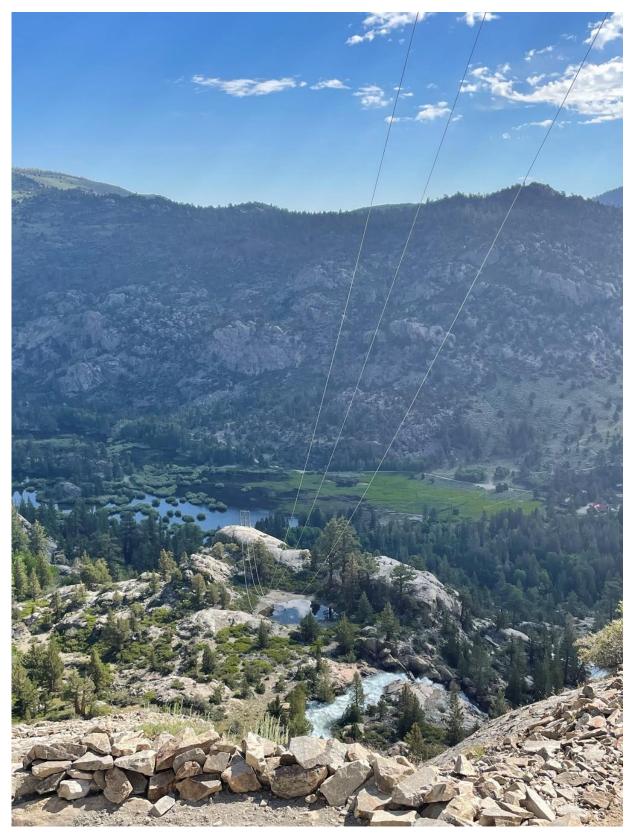
Rush Creek Project (FERC Project No. 1389)	Technical Study Report: LAND 1 – Aesthetic
APPEN	DIY A
Photographs of Project Facility Views	sheds from Key Observation Points

Technical Study Report: LAND 1 – Aesthetics	Rush Creek Project (FERC Project No. 1389)
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Note: July 17, 2023 (37.7655, -119.13)

Photo 1. Key Observation Point 1, Penstock and Tram Tracks



Note: July 17, 2023 (37.7628, -119.129)

Photo 2. Key Observation Point 2, Agnew 4-kV Line



Note: July 17, 2023. (37.7593, -119.132)

Photo 3. Key Observation Point 3, Agnew Dam and Ancillary Facilities—View from Downstream



Note: July 17, 2023 (37.7579, -119.132)

Photo 4. Key Observation Point 4, Agnew Lake and Dam at Shoreline—(looking upstream toward Gem Dam)



Note: July 17, 2023 (37.7579, -119.132)

Photo 5. Key Observation Point 4, Agnew Dam at Shoreline



Note: July 17, 2023 (37.7574, -119.135)

Photo 6. Key Observation Point 5, Agnew Lake—View from Upstream



Note: July 17, 2023 (37.7528, -119.141)

Photo 7. Key Observation Point 6, Agnew Lake and Dam—View from Above



Note: July 17, 2023 (37.7525, -119.141)

Photo 8. Key Observation Point 7, Gem Dam



Note: July 19, 2023 (37.7546, -119.144)

Photo 9. Key Observation Point 8, Gem Dam—View from Upstream (looking east)



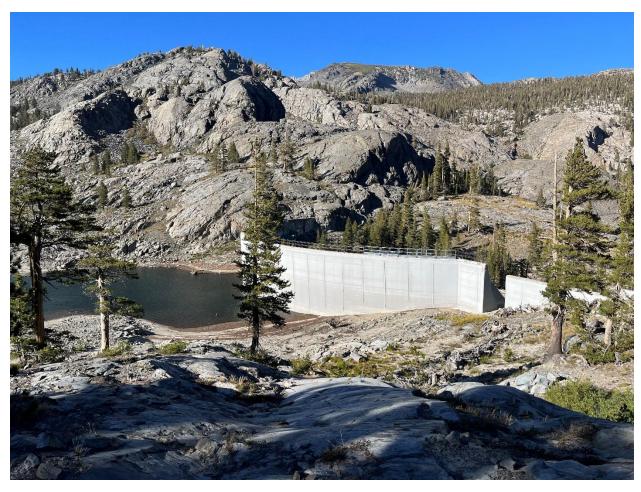
Note: July 17, 2023 (37.7535, -119.148)

Photo 10. Key Observation Point 9, Gem Lake (looking south)



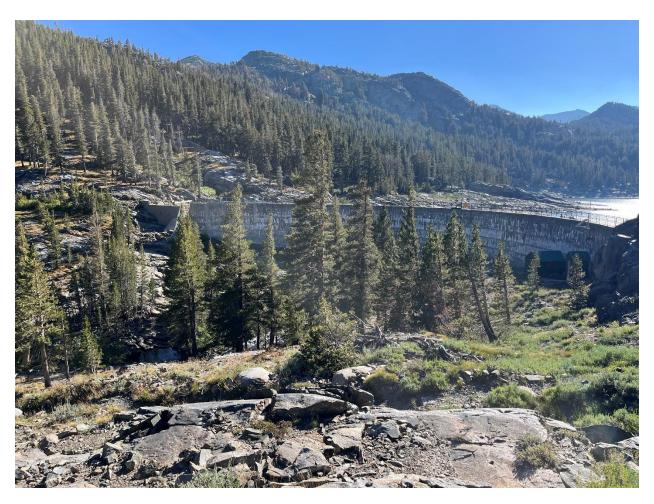
Note: July 18, 2023 (37.7512, -119.181)

Photo 11. Key Observation Point 10, Rush Meadows Dam—View from Downstream



Note: September 26, 2023 (37.7501, -119.182)

Photo 12. Key Observation Point 11, Rush Meadows Dam—View from Weber Lake Trail



Note: September 26, 2023 (37.7517, -119.181)

Photo 13. Key Observation Point 12, Rush Meadows Dam



Note: August 31, 2023 (37.7519, -119.182)

Photo 14. Key Observation Point 13, Waugh Lake—View from Rush Creek Trail Near Dam (looking upstream)



Note: September 26, 2023 (37.7528, -119.185)

Photo 15. Key Observation Point 14, Rush Meadows Dam—View from Upstream Toward Dam



Note: September 26, 2023 (37.7529, -119.195)

Photo 16. Key Observation Point 15, Waugh Lake—Northern Shoreline (looking upstream)



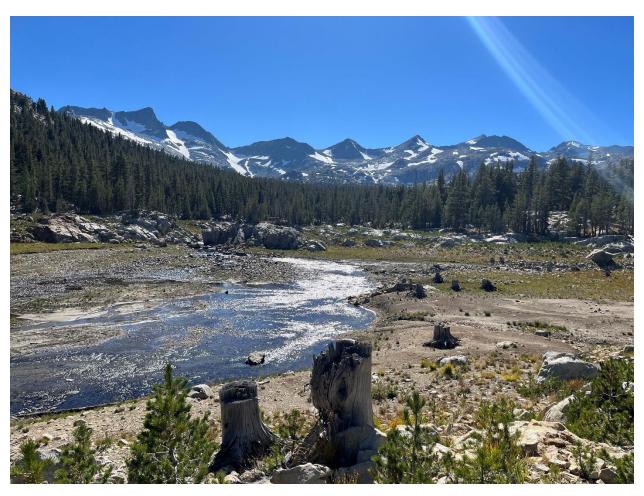
Note: September 26, 2023 (37.7529, -119.195)

Photo 17. Key Observation Point 15, Waugh Lake—Northern Shoreline (looking downstream)



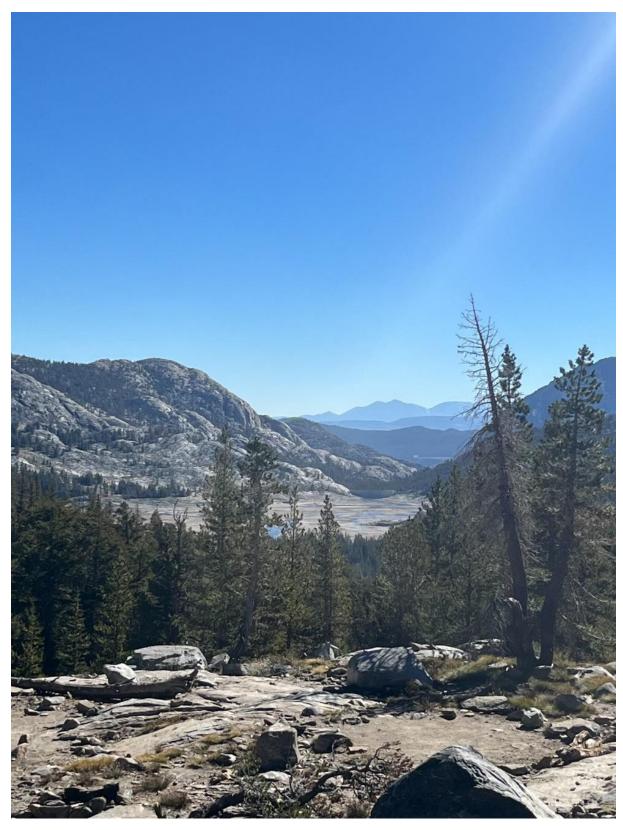
Note: July 18, 2023 (37.7529, -119.195)

Photo 18. Key Observation Point 15, Waugh Lake—Northern Shoreline (looking downstream)



Note: September 26, 2023 (37.7499, -119.201)

Photo 19. Key Observation Point 16, Waugh Lake—Western End (looking upstream)



Note: September 26, 2023 (37.7468, -119.215)

Photo 20. Key Observation Point 17, Waugh Lake from the Pacific Crest Trail

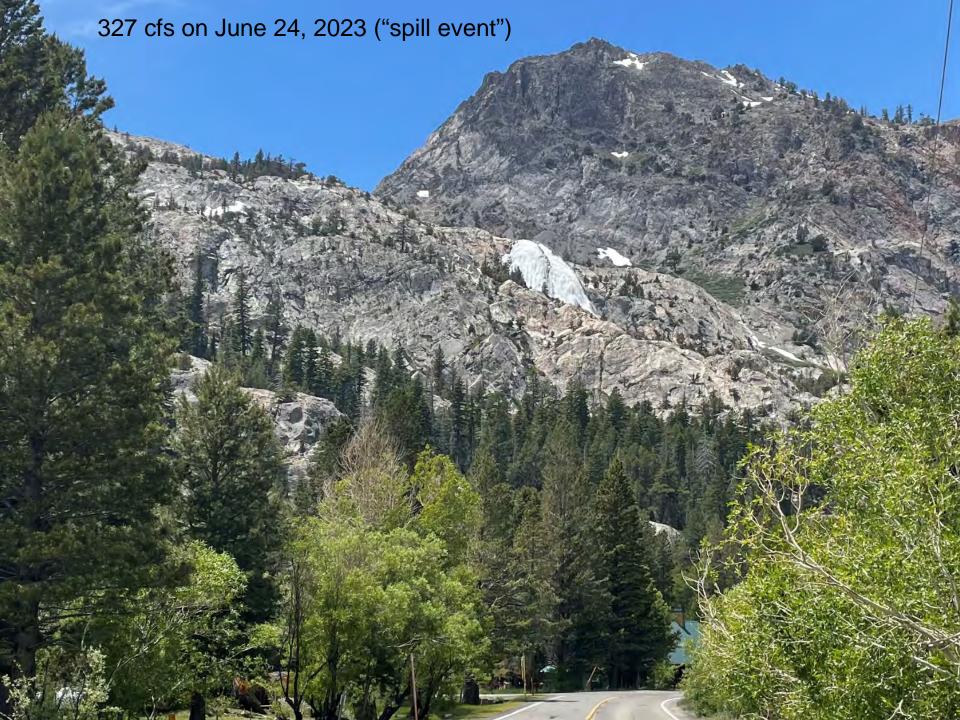
APPENDIX B

Horsetail Falls Photographs

Technical Study Report: LAND 1 – Aesthetics	Rush Creek Project (FERC Project No. 1389)
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FROM THE HIGHWAY

KEY OBSERVATION POINT 1

















FROM THE TRAIL

KEY OBSERVATION POINT 2

















APPENDIX C

Visual Renderings

Technical Study Report: LAND 1 – Aesthetics	Rush Creek Project (FERC Project No. 1389)
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RUSH MEADOWS DAM

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Technical Study Report: LAND 1 – Aesthetics

RUSH MEADOWS DAM - KOP 10



Simulation - Partial Removal



Simulation - Full Removal



RUSH MEADOWS DAM - KOP 12



Simulation – Partial Removal



Simulation – Full Removal



RUSH MEADOWS DAM - KOP 14



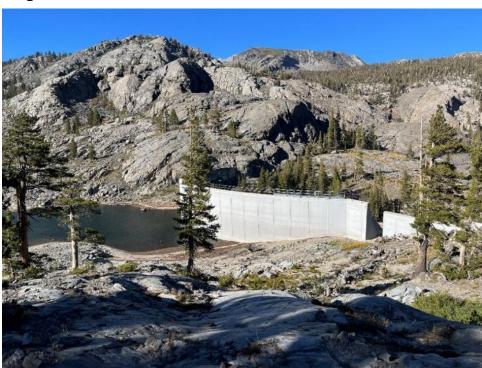
Simulation - Partial Removal



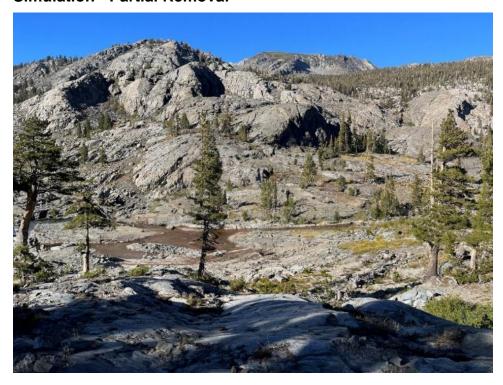
Simulation – Full Removal



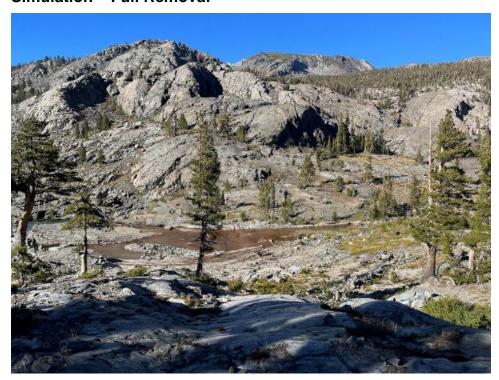
RUSH MEADOWS DAM - KOP 11



Simulation - Partial Removal



Simulation – Full Removal



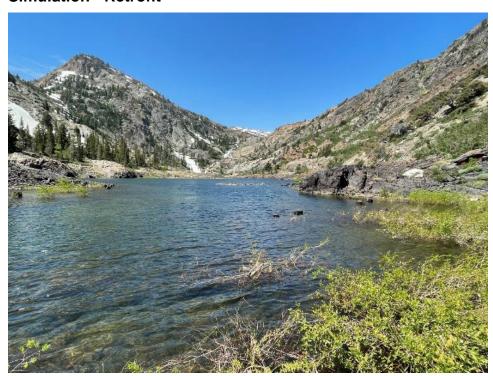
GEM DAM

Technical Study Report: LAND 1 – Aesthetics	Rush Creek Project (FERC Project No. 1389)
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GEM DAM - KOP 4



Simulation - Retrofit



Simulation - Partial Removal



Simulation - Full Removal



GEM DAM – KOP 7



Simulation - Retrofit



Simulation – Partial Removal



Simulation - Full Removal



GEM DAM - KOP 8



Simulation - Retrofit



Simulation – Partial Removal



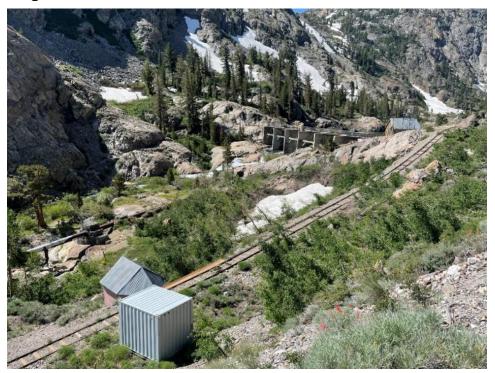
Simulation - Full Removal



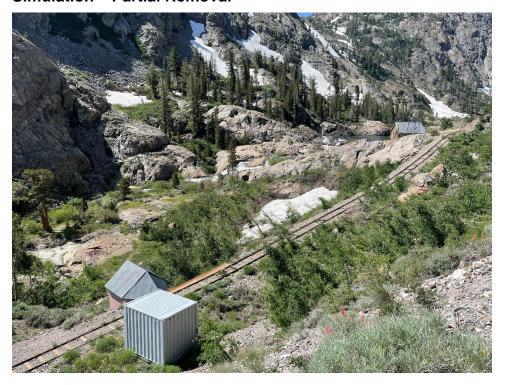
AGNEW DAM

Technical Study Report: LAND 1 – Aesthetics	Rush Creek Project (FERC Project No. 1389)
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AGNEW DAM - KOP 3



Simulation - Partial Removal



Simulation - Full Removal



AGNEW DAM - KOP 4



Simulation - Partial Removal



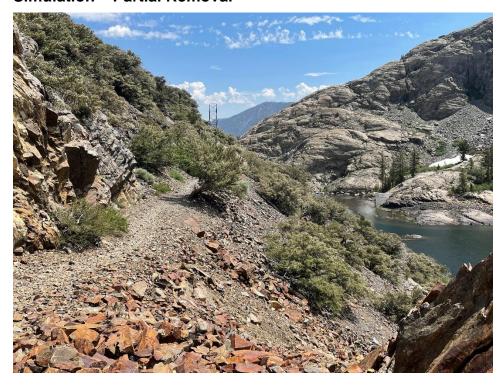
Simulation - Full Removal



AGNEW DAM - KOP 5



Simulation - Partial Removal



Simulation - Full Removal



AGNEW DAM - KOP 6



Simulation - Partial Removal



Simulation - Full Removal

