Supporting Document A (SD A) Technical Study Report Introduction

Supporting Document A (SD A) contains Technical Study Reports (TSR) developed for the relicensing of Southern California Edison Company's (SCE) Rush Creek Project (Project). These TSRs are a result of implementation of 17 Technical Study Plans (TSP) approved by the Federal Energy Regulatory Commission (FERC)[1] and that were developed in consultation with representatives from federal and state resource agencies, Native American Tribes, local governments, non-governmental organizations, local communities, and interested members of the public (collectively referred to as stakeholders).

Each TSR includes a description of the study objectives; study area; approach and methods; and study results. Prior to filing of the Draft License Application (DLA), several Draft TSRs were distributed to the relevant Technical Working Group (TWG) for a 90-day review and comment period. In addition, revised and updated TSRs were provided to stakeholders and local communities for a 90-day review and comment period as part of the DLA filing. While most TSRs were included as part of the DLA, some TSRs, or portions of TSRs, were not available in time for distribution as part of the DLA. A schedule showing when each Draft TSR was distributed to stakeholders and local communities is provided in Table SD A-1. Appendix SD A-1 includes comments received on the Draft TSRs distributed prior to filing of the DLA and SCE's response to those comments.

Following filing of the DLA, SCE:

- Completed and/or updated TSRs for which there were outstanding elements to be completed, or for which there was outstanding elements to be reported based on field data gathered in 2024.

- Completed the updated study report process, including filing the Updated Study Report, conducting a meeting to provide FERC and stakeholders with information regarding progress made in implementing the TSPs, and filing the Updated Study Report Meeting Summary.

- Addressed comments received on the Draft TSRs as part of the 90-day DLA comment period. Refer to Section 13, Consultation Documentation for information regarding the comments received on the DLA and Appendix 13-A for a copy of each comment and a response to comment table.

The TSRs provided in SD A of this Final License Application (FLA) incorporate 2024 study results, and address study-related comments received on the Updated Study Report and DLA, as applicable.

[1] On October 26, 2022, FERC issued its Study Plan Determination with staff-recommended modifications. Of the 15 studies proposed by SCE, FERC approved 14 as filed, and one (TERR 2 – Wildlife TSP) approved with staff modifications. FERC staff also required preparation of two additional studies: an Environmental Justice Study (new study plan proposed by FERC) and a Full Project Decommissioning Study (stakeholder-requested study, as modified by FERC).

Development of the Draft CUL 1, CUL 2 and TRI 1 TSRs are ongoing. These reports will be filed with FERC as part of FLA Volume V (Confidential Information) in 2025 following stakeholder review and incorporation of comments.

Table SD A-1. Technical Study Report Distribution Dates

Technical Study Report[1]	Technical Working Group (TWG) Distribution Date	Revised TSR Distribution Date	
		DLA: August 28, 2024	FLA: January 2025
Aquatic Resources			
AQ 1 – Instream Flow[2]	Part 1: April 24, 2024	Parts 1 & 2	Parts 1, 2 & 3
AQ 2 – Hydrology	April 26, 2024	X	X
AQ 3 – Water Temperature	March 26, 2024	X	X
AQ 4 – Water Quality[2]	March 4, 2024	X	X
AQ 5 – Geomorphology[2]	Part A: April 9, 2024	Parts A & B	Parts A, B & C
AQ 6 – Fish Population and Barriers[2]	February 29, 2024	X	X
AQ 7 – Special-status Amphibians[2]	February 29, 2024	X	X
Cultural Resources			
CUL 1 – Built Environment[3]	—	—	—
CUL 2 – Archaeology[3]	—	—	—
TRI 1 – Tribal Resources[3]	—	—	—
Land Resources			
LAND 1 – Aesthetics[2]	April 1, 2024	X	X
LAND 2 – Noise[2]	March 11, 2024	X	X
Recreation Resources			
REC 1 – Recreation	February 29, 2024	X	X
Terrestrial Resources			
TERR 1 – Botanical Resources	March 29, 2024	X	X
TERR 2 – Wildlife Resources[2]	March 4, 2024	X	X
Environmental Justice			
EJ 1 – Environmental Justice	March 11, 2024	X	X
Full Decommissioning			
DEC 1 – Full Decommissioning[2]	Phase 1: April 1, 2024	X	Phases 1 & 2

Notes:

1 SCE filed a Draft License Application (DLA) for the Project with FERC on August 28, 2024. Supporting Document A (SD A) of the DLA included TSRs that document results of the studies implemented for the Project relicensing. TSRs distributed prior to the DLA were distributed to the relevant Technical Working Group (TWG) for a 90-day comment period; a TSR addressing stakeholder comments, as applicable, was included in SD A of the DLA.

2 Not all study elements were able to be completed during the 2023 field season. As a result, outstanding study elements were completed in the 2024 field season. Data collected during the 2024 field season was used to supplement the data in applicable existing Draft TSRs and is included in the TSRs filed with the FLA.

3 Development of the Draft CUL 1, CUL 2, and TRI 1 studies are ongoing. These reports will be filed with FERC as part of FLA Volume V (Confidential Information) in 2025 following stakeholder review and incorporation of comments.

Key: DLA = Draft License Application; FLA = Final License Application

This Page Intentionally Left Blank

APPENDIX SD A-1

Response to Comments Received on Draft Technical Study Reports (Prior to Draft License Application Filing, August 2024)

This Page Intentionally Left Blank

Stakeholder Comments on Draft Technical Study Reports and Associated SCE Responses

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Agencies and Organizations					
Inyo National Forest	INF-01	5/29/2024	DEC 1 – Full Decommissioning Study	We suggest that the study update all maps to include the Ansel Adams Wilderness boundary for reference purposes, and to use more distinguishing colors or patterns that differentiate various land uses or ownership from one another.	Maps in the DEC 1 study have been updated to include the Ansel Adams Wilderness boundary for reference purposes, and to use more distinguishing colors or patterns that differentiate various land uses or ownership from one another.
Inyo National Forest	INF-02	5/29/2024	DEC 1 – Full Decommissioning Study	When describing the relevant authorization for the proposed construction and/or decommissioning activities (ground disturbing activities) of the associated facilities described within Wilderness, the report should describe the need to evaluate such activities using a Minimum Requirements Analysis (see the Minimum Requirements Analysis Framework (MRAF) template and instructions) and approval by USFS. DEC 1 construction estimates will help inform the potential volume of motorized/mechanized equipment/facilities that may be approved for each activity. Any heavy equipment will require Chief's level approval (FSM 2326.04a).	The DEC 1 study has been updated to clarify that the MRAF will be used to evaluate activities in the wilderness and support Forest Service issuance of a Wilderness Act Variance. (Refer to Section 1.6, Potential Permits and Approvals Associated with the Project Alternatives).
Inyo National Forest	INF-03	5/29/2024	DEC 1 – Full Decommissioning Study	For all but the full-removal alternative, components of the dams and associated facilities and structures would remain in place. Partial removal would leave dam abutments in place and reuse demolished concrete on site as fill removal. The report should include visual renderings of both decommissioning alternatives, as well as SCE's proposal from various photo point locations to determine potential aesthetic and visual impacts.	Visual renderings of partial and full removal of each dam from various public viewpoints (upstream and downstream) are included in the LAND 1 - Aesthetics TSR.
Inyo National Forest	INF-04	5/29/2024	DEC 1 – Full Decommissioning Study	For either decommissioning alternative, the plan should describe the disposition of the Rush Creek Powerhouse and other project associated facilities.	This information is already included in the DEC 1 Study. Refer to Section 1.5.4, Removal of Ancillary Facilities and included in Table 2, Disposition of Project Facilities.
Inyo National Forest	INF-05	5/29/2024	DEC 1 – Full Decommissioning Study	This study should include a description of how SCE will address hazardous waste handling, stockpiling, fuel containment, and/or transport for all construction activities. At a minimum SCE should provide a list of the best management practices for each scenario and use.	This information is included in the DEC 1 Study. Refer to Subsection 1.5.4, Removal of Ancillary Facilities and Table 2, Disposition of Project Facilities.
Inyo National Forest	INF-06	5/29/2024	DEC 1 – Full Decommissioning Study	The study should include an updated analysis which identifies alternative temporary helicopter landing sites, potential alternative flight paths, and/or staging areas to the June Lake parking area. When investigating alternative construction staging or landing areas, the analysis should consider the potential for reducing noise impacts, potential to reduce traffic and associated impacts, and be serviceable if limitations or constraints preclude the use of the June Lake parking lot. This analysis should identify all locations SCE considered in their engineering estimates, the rationale or criteria SCE used to eliminate sites for consideration and include updated engineering estimates for vehicle traffic and load estimates for alternative sites for comparison purposes.	Pending issuance of a Special Use Permit (SUP) from the United States Forest Service (Forest Service), the Base of Operations for all projects would be established at the June Mountain Ski Area Parking Lot (Map A-1), or other suitable location if identified later. SCE has examined other areas from which to locate the Base of Operations - including those areas suggested by Mono County and other stakeholders - and compared these to the June Mountain Ski Area parking lot that SCE currently uses to support Rush Creek maintenance. The June Mountain Ski Area Parking Lot was selected as the Base of Operations for the following reasons: (1) its proximity to the construction sites, (2) it has appropriate access and space available, (3) it does not require any modification or upgrades, and (4) it has been successfully used by SCE to support previous Project maintenance activities. Refer to the DLA, Exhibit E, Section 5, Proposed Action and to Appendix 5-A Project facility Modification Details for more information about the Base of Operations use and access requirements.
Inyo National Forest	INF-07	5/29/2024	LAND 1 – Aesthetics Technical Study Report	One potential alternative landing site (which would require some improvements) is an unimproved area adjacent to the June Lake Fire Department Station No. 2. We believe this site may be suitable for improvements to service SCE's helicopter construction needs, potentially beyond for community helicopter staging and/or use.	Refer to response to INF-06

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Inyo National Forest	INF-08	5/29/2024	DEC 1 – Full Decommissioning Study	The study should more accurately describe and identify the potential locations and construction of staging areas for the mule teams, including any improvements or repair of trails necessary to address mule construction activities.	The DEC 1 study has been updated to provide additional information about the location of staging areas for mule teams. While staging areas for mules teams were already depicted in Map A-2 (Rush Meadows), the staging areas for mule teams were added to Map A-3 (Agnew) and to Map A-4a and A-4b (Gem). In addition, the location of the Frontier Pack Station was added to Map A-1. Finally, additional information about trail restoration was added to the TSR (Subsection 1.2.1).
Inyo National Forest	INF-09	5/29/2024	DEC 1 – Full Decommissioning Study	Regarding the engineering estimates for on-site personnel, existing structures may be upgraded to serve as quarters and sites that are utilized should include bear-safe food storage, and a description of waste containment and removal procedures. Once completed, and if decommissioning alternatives are pursued, the study should describe the steps necessary to remove any improvements and remediate these areas.	Information pertaining to planned worker housing, including use of bear-proof containers, bathroom facilities, emergency shelters and sanitation facilities is included in the DEC-1 study. Refer to Subsection 1.4.1, Worker Housing Area (Agnew), and Subsection 1.5.1, Worker Housing Area (Gem). A statement describing plans for these areas following construction has also been added to the DEC 1 study.
Inyo National Forest	INF-10	5/29/2024	DEC 1 – Full Decommissioning Study	Excavation – excavator use is associated with all alternatives; however size of excavators and amount of use varies. Any updated engineering estimates should include all the heavy machinery calculations and general descriptions of the size of machine used/considered for analysis purposes.	Updated assumptions regarding construction equipment will be developed during final engineering design following FERC issuance of the license order.
Inyo National Forest	INF-11	5/29/2024	DEC 1 – Full Decommissioning Study	It is assumed that the dewatering and associated installation of temporary cofferdams would require the use of motorized pumps/motorized boats. The project description should confirm this assumption or explain how water would be removed from the interior cofferdam areas.	Temporary cofferdams would require the use of motorized pumps (not boats). Dewatering activities are described in the DEC 1 study. Refer to Subsection 1.3.3.1 (Rush Meadows) and 1.5.3.2 (Gem)
Inyo National Forest	INF-12	5/29/2024	DEC 1 – Full Decommissioning Study	Beyond the immediate construction areas, the study should describe whether any erosion control and stabilization of former lakebeds is anticipated.	Refer to the DEC -1 study, Subsection 1.3.4 (Rush Meadows) and Subsection 1.4.4 (Agnew) for project-specific restoration activities. Detailed restoration plans will be developed following FERC's issuance of the License Order.
Inyo National Forest	INF-13	5/29/2024	DEC 1 – Full Decommissioning Study	The study should include all relevant preconstruction best management practices to reduce and control the introduction or spread of invasive species from construction related activities.	Under the Proposed Action, SCE will implement measures and BMPs during construction necessary for Project facility modifications, including best management practices, general construction measures, avoidance and protection measures, construction monitoring, and public outreach notification requirements. Section 5, Appendix 5-B includes these proposed measures and BMPs. Appendix 5-B specifically includes measures to prevent the spread or introduction of invasive species during construction activities. The DEC-1 study was modified to include reference to these measures (refer to Section 1.2.6).
Inyo National Forest	INF-14	5/29/2024	DEC 1 – Full Decommissioning Study	While not included in this study, an updated report should include a description of any revegetation efforts to rehabilitate or restore formerly inundated zones to their natural state.	This information will be developed as part of the detailed restoration plans that will be developed following FERC's issuance of the License Order.
Inyo National Forest	INF-15	5/29/2024	DEC 1 – Full Decommissioning Study	The study identifies potential closure of areas and trails to the public. This should acknowledge a reduction in potential wilderness permits and use is anticipated. Affected trails may include Rush Creek Trail, Clark Lakes Trail, Spooky Meadows Trail, and Weber Lake Trail. Closure timelines should be included for impact analysis purposes. An updated report should describe the time estimates these areas	The DEC-1 study was modified to specify that trails may be closed for the duration of construction (June 1-Oct 31). The construction schedule for each location is provided in the following Subsections: 1.3.3.2 (Rush Meadows), 1.4.3.3 (Agnew), and 1.5.4.1 (Gem). Effects of the Proposed Action pertaining to recreation, including effects associated with closure of Forest Service trails, are evaluated in Section 9.2.9, Recreation of the Draft License Application. Because the duration of construction under full decommissioning would involve more time (years), effects to trail access would be greater.
Inyo National Forest	INF-16	5/29/2024	DEC 1 – Full Decommissioning Study	The plan should identify the specific decommissioning and/or restoration of project specific trails segments from the proposed activities.	The DEC-1 study was modified to specify that Project access trails would be removed (Subsection 1.5.4).

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Inyo National Forest	INF-17	5/29/2024	DEC 1 – Full Decommissioning Study	1.2.1: Use of June Mountain Ski Area (JMSA) for operations will require a separate Special Use Authorization. The proposed use will interfere with the current permit. Adjustments will need to be made to accommodate currently permitted summer uses at JMSA and other locations should be considered as per the general comments above.	SCE understands it would need to obtain special use authorization from the Forest Service for use of the June Mountain Ski Area parking lot. SCE will work with Forest Service to obtain this permit and address any currently authorized uses that could be affected.
Inyo National Forest	INF-18	5/29/2024	DEC 1 – Full Decommissioning Study	1.3.2: The report should explain why the use of the Agnew and Gem trams cannot be used to support or alleviate the dependence of helicopters to transport personnel, equipment, or other materials. Additionally, if either decommissioning scenario moves forward, the plan should explain or include details about whether SCE intends to remove these features and include the steps necessary to remediate the lands along the tramway alignment.	Refer to response to Taylor -05
Inyo National Forest	INF-19	5/29/2024	DEC 1 – Full Decommissioning Study	1.3.4: The report should provide a more comprehensive estimate or timeline to describe the post-construction restoration activities. Additionally, SCE should explain what criteria it suggests should be utilized to ensure that restoration objectives are fully met and that no additional remediation efforts are necessary. The plan should provide a greater level of detail in what will be included in the "conceptual restoration plans." At a minimum these plans should include the monitoring of post restoration activities that relate back to the restoration criteria or objectives.	Subsections 1.3.4, 1.4.4, and 1.4.5 of the DEC 1 - study were modified to include additional information on the timing of restoration and monitoring periods, and actions to be taken if the success criteria are not met with initial restoration actions.
Inyo National Forest	INF-20	5/29/2024	DEC 1 – Full Decommissioning Study	1.4.3.3: The report should clarify that the construction timelines do not run concurrently, and that the activities are done sequentially.	The DEC 1- study was updated to include information on construction sequence and the duration of construction for implementation of each alternative. Refer to Subsection 1.2.7.
Inyo National Forest	INF-21	5/29/2024	DEC 1 – Full Decommissioning Study	1.6: "Wilderness Act Variance" for the project will require USFS authorization. Regarding the partial decommissioning alternative, this option should also consider the removal of all demolition debris within the wilderness, and the reduction of additional equipment or material imported (such as shotcrete) to permanently encase features in the wilderness in the engineering calculations.	The DEC 1 - study includes a description of full and partial removal of all Project dams. As part of full dam removal, all demolition debris within the wilderness would be removed. Refer to Table 3 and 5 (Rush Meadows Dam) and Table 10 and 12 (Gem Dam) for the amount of material imported and exported and equipment necessary under each alternative.
Inyo National Forest	INF-22	5/29/2024	LAND 1 – Aesthetics Technical Study Report	Land 1 - Aesthetics 6.2.2: SCE contends that the Scenic Integrity Objectives included in the 2019 INF LRMP, which include the project area, do not apply to project facilities because they pre-date the adoption of the Scenery Management System. The Forest notes that the LRMP is the guiding document for management of the INF with respect to this project and scope of activity. Compliance with the LRMP with regards to scenery and aesthetics is an area each alternative must address. Effects of proposed options in the decommissioning study should explain how they will affect or address meeting LRMP SIOs. As we suggested in the general comments, SCE should include in the DEC or Land 1 study visual renderings of the various options under consideration.	Effects associated with implementation of the Proposed Action on aesthetics, including LMP SIOs are evaluated in the Environmental Effects section of the DLA. Refer to the DLA, Exhibit E, Section 9.2.10, Aesthetic Resources - Construction Effects and Section 9.3.10, Aesthetics - Operation and Maintenance Effects. Visual renderings of the Project alternatives are included in the LAND 1 - Aesthetics TSR.
Mono County	Mono-Aesthetics-01	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Background. TSR LAND-1 (Aesthetics, page 1) lists five 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 (USFS) 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.	Each Technical Study Report (TSR) describes the methods and results associated with implementation of the associated Technical Study Plan (TSP) as approved by FERC in October 2022. The study objectives and study areas identified in each TSP were developed in collaboration with stakeholders and following a formal TSP review period. For more information about the TSP development process refer to Section 13.4, Study Plan Development and FERC Study Plan Implementation. Because the Base of Operations, presently identified as located in the June Mountain Ski Area Parking Lot, was not identified as a location to study as part of the LAND 1 - Aesthetics TSP, there are no results reflecting study of that area in the TSR.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
				Based on these objectives, TSR LAND-1 identifies five areas to be studied including (1) Rush Meadows Dam area, (2) Gem Dam area, (3) Agnew Dam area, (4) Rush Creek Powerhouse, and (5) Horsetail Falls. Within these five study areas, a total of 17 Key Observation Points (KOPs) were selected for preparation of schematic renderings to depict existing conditions and post-project conditions (including project options). The resulting visual renderings provided in TSR LAND-1 (Aesthetics) are well prepared, and helpful in visualizing existing conditions and future options for the identified study area facilities. Mono County requests that SCE apply the same objectives, and give the same level of analysis and visual assessment, to other critical project components including the planned June Mountain Ski Area parking lot base of operations (the 'Base').	Refer to the DLA, Exhibit E, Section 9.2.10, Aesthetic Resources - Construction Effects for a discussion of the potential effects to visual resources during construction activities - including potential effects to visual resources associated with construction activity at the Base of Operations.
Mono County	Mono-Aesthetics-02	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Proposed Base of Operations. As shown below, the proposed Base site is located directly adjacent to SR-158 and at the terminus of North Shore Drive. SR-158 is a County-designated Scenic Highway that serves as a main artery for June Lake residents and tourists, and strongly influences initial visitor perceptions of the community as a whole. North Shore Drive is an arterial alternative to SR-158, providing access from Oh! Ridge and the Village area to the ski area base. Facilities at the future Base are described by SCE1 as including a wide range of heavy industrial materials and equipment: - Skycrane Helicopter, Heavy Lift (11,000-lb. load capacity) - Modified Black Hawk Helicopters, Moderate Lift (6,000-lb. load capacity) - A-Star 350, Light Lift Helicopter (2,500-lb load capacity) -Helicopter landing site with k-rail barriers and fuel storage tanks with secondary containment - Staging Area for storage of construction equipment and materials - Helicopter Fuel Storage Tanks (including secondary containment) - K-rail Barriers (control access to landing sites) - Office Trailers (1 for SCE project management and 1 for contractor construction personnel) - 25-kW Generators (2 total—one for each office trailer) - Shipping containers (several, to secure smaller construction materials and equipment) - 10-wheel dump truck - 20-foot cargo van - Type 6 Fire Engines (minimum 300-gallon capacity) with fire suppression equipment, fire box and water tender with a minimum 50-feet of hose - Cat 313 Excavator - Cat 950 Loader - Telehandler Forklift - Stockpile area to temporarily storage materials removed from the construction sites prior to transport to an approved disposal site. The site will have specific locations designated for hazardous and non-hazardous materials and ultimate disposal location. - General parking area for use by project managers, construction personnel, subcontractors and other support personnel as well as a designated area for construction equipment parking - Additional Materials: Concrete Flight Buckets, Debris Boxes, Concrete Waste Bin, Street Sweeper, Sanitary Facilities (port-a-johns, number to be determined), Security Kiosk (with 24-hour personnel during the construction season Mono County CDD has not seen a site plan showing where these facilities would be placed. However, the extensive list of equipment and materials suggests that planned facilities will occupy most or all of the Base area parking	A site plan that identifies the locations for storage and staging of construction equipment and materials at the June Mountain Ski Area parking lot has not been developed but will be developed after relicensing issuance and construction plans proceed. Construction plans specific to staging and access at the June Mountain Ski Area parking lot will be developed by SCE in coordination with the U.S. Forest Service, June Mountain Ski Area operations personnel, and the selected construction contractor. The expectation is that the Base of Operations would not require exclusive use of the parking lot; the parking lot would continue to be available for use by June Mountain Ski Area employees and guests for special events (such as mid-mountain weddings). Refer to the DLA, Exhibit E, Section 9.2.10, Aesthetic Resources - Construction Effects for a discussion of the potential effects to visual resources during construction activities - including potential effects to visual resources associated with construction activity at the Base of Operations.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
				lot. Mono County requests that SCE provide a detailed site map depicting the layout of facilities on the Base site, with clear identification for each use, to determine whether any portion of the lot would remain available for typical community uses (see below) and aid in the assessment of visual impacts.	
Mono County	Mono-Aesthetics-03	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Compliance with Mono County General Plan. The June Mountain parking area supports a wide range of summer recreational uses. These uses are integral to the June Lake economy. The Ski Area's J1 chairlift is an important anchor for summer uses, providing public access to the June Mountain Chalet scenic overlook. The scenic overlook at the Chalet is a popular location for summer weddings and receptions, which often require long-term planning. The parking lot provides overflow parking for hikers and cyclists, and serves as a staging area for special event parking. The June parking area has in the past also served as a stop for summer transit operations. Moreover, the proposed Base site is visible to the public from a wide range of vantage points. These include not only the June Mountain Chalet scenic overlook, but also a host of area trails that are used for summer hiking and biking and various points along SR-158, a County-designated scenic highway. The Mono County General Plan elements provide policies and actions to guide land use planning and achieve communities' long-term goals and vision for the future. Scenic resources are addressed in the 2015 Mono County General Plan Conservation and Open Space Element through Goal 20 (Protect and Enhance the Visual Resources and Landscapes of Mono County). Several policies that support Goal 20 are relevant to the Rush Creek Project:	Comment noted. Refer to the DLA, Exhibit E, Section 9.2.10, Aesthetic Resources - Construction Effects for a discussion of the potential effects to visual resources during construction activities - including potential effects to visual resources associated with construction activity at the Base of Operations.
Mono County	Mono-Aesthetics-04	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Action 20.A.1.a. Identify important scenic resources, including scenic highway corridors, in the MEA (Master Environmental Assessment). Discussion: SR-158 is a designated scenic highway and an important scenic resource for June Lake and the County as a whole.	SCE recognizes SR-158 as an eligible scenic highway. DLA, Exhibit E, Section 8.9, Land Use identifies six road segments in the vicinity of the Project that are either officially designated or eligible for inclusion in the National Scenic Byways Program or the California Scenic Highway Program, including portions of SR-120, SR-158, and US-395. Following filing of the FLA, FERC will initiate the post-filing process including the development of an environmental analysis pursuant to the National Environmental Policy Act – and involving preparation of an Environmental Assessment (EA) or Environmental Impact Statement (EIS), will be led by FERC.
Mono County	Mono-Aesthetics-05	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Action 20.A.2.a. Work with federal, state, local, and other appropriate organizations to review and coordinate the protection and enhancement of the county's scenic resources. Discussion: Preparation of visual simulations for the June Base area will equip SCE and Mono County to jointly identify alternative layouts, management tools, and screening options to minimize or avoid impacts to the scenic corridor and to uses that will be visible to the public from various locations. The Conservation/Open Space Element appendices contain design guidelines for screening.	The DLA includes construction measures intended to reduce or avoid impacts to visual resources during construction. These include the following: - Limit construction activities to designated work and staging areas - Limit work time and duration - Select equipment that is less visually intrusive - Conduct public outreach and communication - Comply with measures that limit fugitive dust that could otherwise reduce scenic visibility and obscure views A complete list of construction measures is included in Exhibit E, Section 5, Appendix 5-B. The LAND 1 - Aesthetics TSP did not identify objectives or an approach directing the identification of Key Observation Points from which to view the June Mountain Ski Area Parking Lot, nor did the TSP direct the preparation of visual renderings of any of the construction sites. Because the TSR reflects the results of the TSP (developed in coordination with stakeholders and approved by FERC), SCE does not plan to identify or analyze additional KOPs specific to the Base of Operations or to prepare visual renderings of any of the construction sites.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
					Refer to the DLA, Section 9.2.10, Aesthetic Resources - Construction Effects for a discussion of the potential effects to visual resources during construction activities - including potential effects to visual resources associated with construction activity at the Base of Operations.
Mono County	Mono-Aesthetics-06	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Action 20.C.1.a. Future development projects with the potential to have a substantial, demonstrable negative aesthetic effect shall provide a visual impact analysis prior to project approval. Examples of a substantial, demonstrable negative aesthetic effect include reflective materials; excessive height and/or bulk; excessive night lighting (and other elements). Discussion: Although the Base site is not a 'future development project,' it has clear potential for substantial negative aesthetic effects, as defined, and a timeframe that could extend over a decade of consecutive summer construction seasons (and also peak tourist season in June Lake). Preparation and analysis of visual simulations for the Base is a critically important task to identify mitigations to address adverse project impacts on the visual resources that support the June Lake economy.	Refer to the DLA, Section 9.2.10, Aesthetic Resources - Construction Effects for a discussion of the potential effects to visual resources during construction activities - including potential effects to visual resources associated with construction activity at the Base of Operations.
Mono County	Mono-Aesthetics-07	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Action 20.C.3.d. Apply to SCE for financial support to convert eligible overhead lines to underground utilities. Discussion: Overhead power lines have been cited by SCE as a constraint in the identification of alternative sites for the Base. Mono County would welcome the opportunity to explore with SCE the feasibility of obtaining financial support to 'underground' area power lines and thereby enhance the feasibility of alternative locations for the Base (away from the June Lake community) while reducing area fire risk and implementing General Plan policy.	Relocating overhead transmission lines is beyond the scope of this relicensing proceeding and any action involving undergrounding transmission or distribution lines would have to be evaluated through a separate process outside the relicensing framework. The June Mountain Ski Area Parking Lot was selected as the Base of Operations for the following reasons: (1) its proximity to the construction sites, (2) it has appropriate access and space available, (3) it does not require any modification or upgrades, and (4) it has been successfully used by SCE to support previous Project maintenance activities.
Mono County	Mono-Aesthetics-08	6/27/2024	LAND 1 – Aesthetics Technical Study Report	June Lake Area Plan. Equally relevant to the project are goals and policies in the 2015 June Lake Area Plan. This Plan provides a comprehensive, integrated, and internally consistent guide for policy decisions and development in June Lake through 2030. The discussion of Community Development states, in the discussion of Community Design Issues (page 9), that the "Loop's built environment has a close physical association with SR 158, which strongly influences initial visitor perceptions of the community 158". Community Design Goal 5 is to "Maintain and improve the visual quality of the June Lake Loop's environment by enhancing existing structures, guiding future development and preserving scenic views." Objective 5.B (page 23) addresses visual elements, including Policy 2 to "protect and enhance, where feasible, scenic vistas from SR 158 and other viewing areas". Relevant supportive measures include: "Policy 5.B.2. Protect and enhance, where feasible, scenic vistas from SR 158 and other viewing areas" "Action 5.B.2.a. Promote appropriate visual screening of project proposals within significant view areas of SR 158 and major and minor features of the natural environment. This may include the use of natural and built visual barriers, breaks or screens such as landforms, berms and vegetation. "Action 5.B.2.f. Where feasible, work with Southern California Edison to underground, relocate or visually screen power lines and other facilities in areas of high visual quality. Lines and facilities crossing, running adjacent to or visible from SR 158 and the West Village/Rodeo Grounds should receive priority consideration". Thus, compliance with the Mono County General Plan policies would require management of the visual impacts of an industrial use at the June Mountain Base site.	Refer to response to Mono-Aesthetics-05, above.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Mono County	Mono-Aesthetics-09	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Recommended Additional KOPs. The Rush Creek project is a large and long-term undertaking that will occur in a small community that is economically dependent on summer recreation and for which SR 158 is the sole through-arterial highway. Due to its central location within the loop, the proposed June Mountain Base of Operations has potential for significant adverse impacts to the visual and recreational resources on which the June Lake economy is based. These potentially significant impacts cannot be mitigated unless they are first analyzed with the careful consideration already given to the dam areas. For this reason, TSR LAND-2 (Aesthetics) should be expanded to include visual simulations and analyses for KOPs associated with the proposed June Mountain Base of Operations. The four KOP locations recommended by Mono County for the expanded study simulations include: (1) June Lake Loop Trail (2) Mid-Chalet on June Mountain (where events are held and scenic chairlift rides terminate) (3) Scenic Highway 158 (viewing west on approach to the ski area parking lot) (4) North Shore Drive (where it approaches from the Rodeo Grounds property). A map is provided on the following page to show the general vicinity of these recommended KOP locations. Each of the identified sites will require field verification to determine the most representative viewpoint.	Refer to response to Mono-Aesthetics-05.
Mono County	Mono-Aesthetics-10	6/27/2024	LAND 1 – Aesthetics Technical Study Report	Relationship between Aesthetics and the June Lake Economy. Mono County requests that SCE provide access to the TSR on Socioeconomic Effects. As described in this comment letter, the economy of June Lake is deeply entwined with the aesthetic values of June Lake, as well as existing and future land uses in the vicinity of the proposed Base site. Potential socioeconomic ramifications of the project must be timely understood in order for June Lake residents and businesses to prepare in advance, minimize losses and, ideally, identify and respond to any potential economic opportunities. Mono County looks forward to working with SCE and the June Lake community to ensure that these goals are met.	The Technical Study Plans approved by FERC in October 2022 did not include the requirement to prepare a technical study on socioeconomics. However, the DLA Environmental Effects section does include a discussion on the potential effects to socioeconomics associated with construction activities and effects to socioeconomics from operation and maintenance of the Proposed Action. Refer to Exhibit E, Section 9.2.13 and 9.3.13. For more information about the TSP development process refer to Section 13.4, Study Plan Development and FERC Study Plan Implementation.
Mono County	Mono-Aesthetics-11	6/27/2024	LAND 1 – Aesthetics Technical Study Report	The additional analyses and simulations will enable SCE to mitigate or avoid impacts at the June Mountain Base site through design, layout, screening, safety features, and other means. Such analysis should also include similar assessments of alternative base locations. The alternative base locations suggested in our Noise TSR comments would likely avoid the visual impacts to the June Lake Community. If results indicate that impacts to aesthetic resources cannot be substantively reduced at the June Mountain Parking Lot, that finding will point to the need for meaningful consideration of alternative locations for the proposed Base of Operations.	Refer to response to Mono-Aesthetics-05, above. Also, please note that the June Mountain Ski Area Parking Lot was selected as the Base of Operations because it is the closest to the construction sites, has appropriate access and space available, does not require any modification or upgrades, and has been successfully used by SCE to support previous Project maintenance activities. Refer to the DLA, Exhibit E, Section 5, Proposed Action and to Appendix 5-A Project facility Modification Details for more information about the Base of Operations use and access requirements.
Mono County	Mono-Decommissioning-01	7/1/2024	DEC 1 – Full Decommissioning Study	...it is Mono County's understanding that the full decommissioning alternative would have greater potential than all other alternatives for impacts on export of demolition material, helicopter trips (heavy and light lift), truck trips (construction and disposal), mule trips, and project duration. SCE's preferred alternative (Gem retrofit and partial removal of Agnew and Rush Meadows dams) would have the shortest project duration and the fewest number of truck trips, while the partial removal alternative (all dams) would have the fewest number of helicopter trips. The retrofit and partial dam removal options would have no requirement for export of demolition materials. Mono County acknowledges and appreciates the level of detail and useful information provided by SCE in TSR DEC-1 for the dam alternatives.	SCE appreciates Mono County's reflection of these differences. This synthesis is correct.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Mono County	Mono-Decommissioning-02	7/1/2024	DEC 1 – Full Decommissioning Study	The County does have a question on concerning helicopter flight patterns. It appears that one route would have the helicopters fly directly over the canyon, while an alternate route appears to avoid the canyon. The flight route that avoids the canyon would be expected to have fewer noise impacts on Down Canyon residents and visitors. What operational assumptions, constraints and helicopter route requirements were used by SCE in the analysis? Reduction on of project-related noise levels is a primary goal for Mono County. If feasible, the route that avoids the canyon should be identfied as the preferred flight pattern.	Refer to the DLA, Exhibit E, Section 9.2.15, Noise - Construction Effects for an analysis of the potential noise effects associated with construction activities - including helicopter flights. SCE's intention is to complete the Project efficiently and safely while minimizing adverse effects, including noise, to the extent practicable. SCE will implement the noise measures identified in Exhibit E, Section 5, Appendix 5-B to reduce the effects of noise.
Mono County	Mono-Decommissioning-03	7/1/2024	DEC 1 – Full Decommissioning Study	FORMAL REQUEST FOR SCE TO REVIEW ALTERNATIVE LOCATIONS FOR PROPOSED BASE OF OPERATIONS TSR DEC-1 §1.2 states that the project alternatives for Rush Meadows, Agnew, and Gem dams vary in their locations, objectives, specific construction activities, timing, and duration, but share certain project components. The shared components include use of the June Mountain Ski Area parking lot as a base of operations. SCE does not state or explain its reasons for excluding the Base location from the alternatives review. However, analyses provided in DEC-1 and other TSRs show that there are significant differences between the dam alternatives in terms of the type and scope of impacts that may occur. It is reasonable to anticipate that the Base alterntives would also differ widely in their potential for adverse impacts. The June Mountain Ski Area parking lot Base location is associated with multiple potentially significant adverse impacts on the June Lake community. The potential impacts include but are not limited to (1) impaired circulation, (2) uncertainty in local planning, (3) increased noise and emissions, (4) heightened concerns for pedestrian/cyclist safety, (5) impairment of scenic resources, and (5) potentially severe economic harm. The scope and magnitude of potential impacts is a sufficient and compelling reason for SCE to seriously examine alternative base locations. A careful review of alterative Base sites could result identification on of one or more alternative locations that would reduce or avoid significant impacts without compromising attainment of SCE objectives. This ideal outcome can be achieved only if SCE undertakes a thorough review of poten al alternative Base locations. Mono County hereby requests that SCE undertake a review of alterntive Base sites.	The June Mountain Ski Area Parking Lot was selected as the Base of Operations for the following reasons: (1) its proximity to the construction sites, (2) it has appropriate access and space available, (3) it does not require any modification or upgrades, and (4) it has been successfully used by SCE to support previous Project maintenance activities. Refer to the DLA, Exhibit E, Section 5, Proposed Action and to Appendix 5-A Project facility Modification Details for more information about the Base of Operations use and access requirements. SCE has examined other areas from which to locate the Base of Operations - including those areas suggested by Mono County and other stakeholders - and compared these to the June Mountain Ski Area parking lot that SCE currently uses to support Rush Creek maintenance.
Mono County	Mono-Hydrology-01	7/26/2024	AQ 2 - Hydrology Technical Study Report	Concern: predicted flows, which could be used to model the project's effect on nearby floodplains are possibly underestimated. Estimation of 100-year unimpaired flow: The correlations in the Pre-Application Document 4.3A between the Silver Lake Gauge and the Walker River which were used to scale flows for the unimpaired scenario seem to fit well for low flows, but the data are sparse and don't fit well at high flows. A different method (perhaps second order curve?) might work better for the purpose of scaling higher flows. The Gotvald 2012 regression equations that were discarded for being too high might also be reconsidered for this purpose. It looks like the Walker Gauge that was used to scale the Rush Creek data was included in the development of those discarded equations. The error between that gauge data, and the regression equations could be looked at, and if low, maybe Gotvald's Lahontan region regression equations might be deemed useful after all.	Daily unimpaired flows for the 1990 – 2022 period of record (POR) were calculated using measured gage data in Rush Creek and measured changes in storage at Waugh, Gem, and Agnew Lakes; therefore, it is unlikely that high unimpaired flows were underestimated. This assumes the gage data were accurate (we have no reason to question accuracy of the gage data). The Walker River regression in the Pre-Application Document was not used for high flows in the unimpaired flow calculations. It was only used for a small subset of low flow time periods, particularly when calculated unimpaired flow was negative. At very low flows (e.g., a few cfs), the unimpaired calculations, which back-calculate inflow to the reservoirs from daily change in reservoir storage, can become "noisy" and have periods of small negative flow. The Gotvald et al. (2012) paper states the following regarding the Mono Lake / Rush Creek drainage: "In addition to the six hydrologic regions determined suitable for development of regression equations, a region including only two gages was delineated as an indeterminate region for flood-frequency estimation. This indeterminate region

<table>
<tr><th>Commenter</th><th>Comment No.</th><th>Date Received</th><th>Study Plan</th><th>Comment</th><th>SCE Response</th></tr>
<tr><td></td><td></td><td></td><td></td><td>Public Works is also curious if the equations for the nearby Sierra Nevada region from Gotvald 2012 were looked at, especially compared to any data obtained from higher in the watershed nearer the divide and above storage, and what 100-yr flow those equations might predict.</td><td>that includes Mono Lake and the upper Owens River valley is generally high in elevation but also generally dry. This region is outside the area for which regional skew was determined in California (Parrett and others, 2011), and it is within the general desert region identified by Thomas and others (1997) for which regional skew was determined to be zero. Annual peak flows from the two stream gages in this region are smaller than those from comparably sized drainages in any of the adjoining hydrologic regions. Consequently, expanding the adjoining hydrologic regions to include portions of this indeterminate region was considered likely to result in equations that would overpredict peak flow in this unique region.”

We did test the equations from the other regions but found the same as Gotvald et al. (2012). The equations overpredict annual peak flows based on the available gage data in Rush Creek.</td></tr>
<tr><td>Mono County</td><td>Mono-Hydrology-02</td><td>7/26/2024</td><td>AQ 2 - Hydrology Technical Study Report</td><td>Concern: the analysis may not be generally on a trajectory to adequately consider the project’s effects on channel hydraulics in Reversed Creek and the surrounding floodplain in the vicinity of the confluence of Rush and Reversed Creeks.

Modeling project effect on Floodplain:
Rush Creek combines with Reversed Creek downstream of the proposed project. Reversed Creek is surrounded by an approximate A zone floodplain, and residential development in and around that floodplain. The area surrounding the confluence is relatively flat wetland. Flow is likely subcritical here, thus potential for any increased flow from Rush Creek to create a backwatering effect in Reversed Creek and the other minor unnamed creeks exists. Reversed Creek in the vicinity of the confluence should be included as a Project-affected stream reach and analyzed along with the other reaches.

Other than mention of a temporary gauge, and possibly some adjustment for mass-balance, consideration of the contribution of flow from Reversed Creek seems to be absent in AQ-2. For example, Table AQ 2-10 shows that the 1% annual exceedance of Rush Creek above SR158 is determined to be 1,328cfs, and the same above Silver Lake to be 1,524 cfs, implying that the contribution of Reversed Creek during the same such event would be 196 cfs. In contrast, A 1993 Army Corps floodplain study of Reversed Creek uses a 100-yr flow of 1,700 cfs in the Reversed Creek channel at the same vicinity. Subsequently developed regression equations (1994 USGS, and 2007 Caltrans) also predict higher flows in Reversed Creek during the 100- year event. The Reversed creek and Rush creek watersheds are close enough that both could reasonably be expected to experience high flow events simultaneously.

Mention is made to backwater effects being considered in AQ-1 – instream flow technical study plan as a future component. Public Works is unclear as to what the scope of that additional study will be. If the intent is for the flows determined in AQ-2 to be used in this future effort, Public Works thinks more conservative estimates of the flow contribution of Reversed Creek, especially during flood events should be made.

Public Works is not aware of any accurate hydraulics models of the area surrounding the confluence of the creeks that could be used to demonstrate the effects the project could have on the floodplain. Public Works recommends that a HEC-RAS model per applicable FEMA guidance for preparation of a flood</td><td>Hydrodynamics modeling - The updated AQ 1 – Instream Flow Technical Study Report (AQ1-TSR) available in the Draft License Application includes empirical data that show the backwater effects of Silver Lake on Rush Creek and Reverse Creek at various flows. 2-D modeling has been limited, however, to the two reaches of stream identified in the AQ1-TSR, which are South Rush Creek above and below SR-158 and Rush Creek upstream of Silver Lake.

Thanks for providing the reports cited in the comments. We will review those studies to see if there is pertinent information that can be utilized in our studies. Based on a cursory review of the studies, they used different calculation methods with limited gage data. For the AQ2-Hydrology TSR modeling we used peak annual flow events, 1990 – 2022, from Rush Creek gage records (that include Reverse Creek flows). There are two locations in the watershed that have suitable long-term gages for analysis: (1) the combined SCE Gages (Rush Creek at Flume below Agnew Lake near June Lake, CA and Rush Creek PP tailrace near June Lake, CA) and (2) Los Angeles Department of Water and Power (LADWP) Rush Creek ab Grant Lake near June Lake, CA, gage.

<table><tr><th>Location</th><th>Entity and Station No.</th><th>Data Type</th><th>Period of Record</th></tr><tr><td>Rush Creek at Flume below Agnew Lake near June Lake, CA</td><td>SCE 357 & USGS 10287289</td><td>Daily Flow /15-min Flow</td><td>10/01/1988–Present</td></tr><tr><td>Rush Creek PP tailrace near June Lake, CA</td><td>SCE 367 & USGS 10287300</td><td>Daily Flow /15-min Flow</td><td>10/01/1986–Present</td></tr><tr><td>Rush Creek ab Grant Lake near June Lake, CA</td><td>LADWP MS 5013 & USGS 10287400</td><td>Daily Flow /15-min Flow</td><td>10/01/1986–Present</td></tr></table>
To the extent that the LADWP gage accurately measures high flow events, this gage data captures both Reverse Creek and Rush Creek flows. We recognize the contrast mentioned in your comments regarding the 100-year flow recurrence identified in the other studies and those identified in the AQ2 – TSR. We will also review our calculations. Likely, however, the differences identified in your comments are a function of the data sources and methods used in the different studies.

The maximum daily average flow at the LADWP gage on Rush Creek above Grant Lake (including Reverse Creek) since 1990 (34 years) was 721 cfs daily average (740 cfs adjusted peak flow). When the unimpaired annual peak flows</td></tr>
</table>

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
				insurance study be constructed which simultaneously considers all of the watersheds feeding the confluence.	(back-calculated from this gage) were analyzed in the USGS PeakFQ software (Veilleux et al. 2014), which uses Bulletin 17c procedures along with the regional skew information in Parrett et al. (2011), the 100-year flow Rush Creek above Silver Lake (including Reverse Creek) was 1,524 cfs and the 100-year flow below Silver Lake (including Reverse Creek) was 1,654 cfs (AQ2-TSR).
Mono County	Mono-Hydrology-03	7/26/2024	AQ 2 - Hydrology Technical Study Report	It is unclear to the County whether the Rush Creek Project would contribute to additional flood hazards or alter existing floodplain. However, Public Works believes that the possibility is likely enough to warrant preparation of a high-quality simulation and analysis of hydraulics around the confluence of Rush Creek and Reversed Creek. If results of such a modeling effort show the potential for the project to impact nearby homes and streets, the model would also be instrumental for SCE to design stream channel enhancements or other possible mitigations.	The Rush Creek Project is a hydropower project and not a flood control project. The FERC approved studies did not include a full HEC-RAS hydraulics model of the floodplain upstream of Silver Lake (including Reverse Creek). The FERC approved study plans (AQ1, AQ2, and DEC1), however, will provide very useful information to assess high flow hazards. In particular, AQ1 includes empirical data on backwater effects upstream of Silver Lake at different flows. AQ1 also includes detailed modeling of South Rush Creek upstream and downstream of SR-158 where buildings are susceptible to high flows (final modeling results will be available in the Final License Application).
Mono County	Mono-Noise-01	6/7/2024	LAND 2 – Noise Technical Study Report	Summary: • Convert all 16 Points of Interest (POIs) into measurements for all types of noise and add three POI locations as specified in the comments. • If the POIs are not converted to assess all noise types, add two new POIs to assess truck traffic noise in Down Canyon and June Lake Village. TSR LAND-2 Sections 3.1 through 5.0 describe the process used to identify and refine sensitive noise receptors, noting that the number of POIs was expanded over time in response to stakeholder concerns. All of the existing POIs are in the SCE-defined 'noise assessment study area' that includes the Rush Creek Powerhouse area, the JMSA Parking Lot area, helicopter flight paths between JMSA Parking Lot and the project construction areas, construction activities at the potential enhancement area in lower Rush Creek channel, and truck haul routes on SR-158. In conversations with Mono County staff following the 30 April 2024 June Lake Community presentation, recommendations for additional POIs were solicited. None of the current POI noise measurement locations encompass the community areas around and between Gull and June Lakes. To ensure that these areas are part of the analysis, the County requests that SCE obtain supplemental noise measurements at three additional POI locations. As shown in the POI Location Map, the locations include: (a) Memorial Ballfield/Ballpark located just north of the intersection of North Lake Drive & Mountain Vista Drive, (b) June Lake Library/Community Center located just north of the junction of E. Granite Drive & W. Granite Drive, (c) Residential/Commercial area located between SR 158 and Cherokee Lane. These sites should be used to assess noise from helicopter flights, trucks and construction. All three of the proposed community POI locations are representative of facilities and locations commonly used by the June Lake Community, and thus useful in gauging the impacts of project-related noise on community life. The recommended POIs are also consistent with Caltrans' and FAA's shared definitions of noise sensitive areas (i.e., residences, schools/libraries/ educational, churches/religious, and hospitals/health) as cited in TSR LAND-2 §5.1.1. With regard to helicopter and truck noise, the Noise TSR identifies 16 single source POIs, with most committed to assessing powerhouse noise, and only two assigned to helicopter noise. Also, although truck traffic originates at June Mountain, the POIs for trucks are situated outside the community at Silver Lake and Grant Lake recreation areas, rather than in the	The LAND 2 Noise study has been updated to include maps that illustrates those geographic areas that will be exposed to an Lmax of 60 dB or greater associated with single event project-related noise (helicopters, trucks, and construction equipment at the Base of Operations). Refer to Map LAND 2-4 and LAND 2-5. The intention of the maps is to share information with interested stakeholders about the maximum sound level that may be experienced across the landscape from a variety of locations in the vicinity of the construction activity – including at locations in the town of June Lake.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
				community. Either all POIs should be used to assess all noise sources, or additional POIs should be added to 3 monitor truck noise Down Canyon and in June Lake Village, and helicopter flight noise in similar locations. Also, as noted above, the three recommended POIs for the community core should assess multiple noise sources.	
Mono County	Mono-Noise-02	6/7/2024	LAND 2 – Noise Technical Study Report	Summary: Use the Mono County Noise Ordinance to establish impact significance thresholds. TSR §5.1.4 NOISE THRESHOLDS. SCE states in Section 5.1.4 that it is currently in consultation with Mono County to identify the most appropriate noise thresholds for assessing project construction activities, and that results of the discussions will be provided to stakeholders during the TSR review period. Staff is unaware of any active, direct discussion on appropriate noise thresholds at this time. The Mono County Noise Ordinance (County Code Chapter 10.16 – Noise Regulation; https://library.municode.com/ca/ Mono County/codes/code_of_ordinances) should be used by SCE as the noise thresholds for assessing project construction activities. This ordinance implements the policies of the Mono County General Plan Noise Element and its 4 goal to preserve the county's quiet, rural atmosphere by maintaining existing ambient noise levels and preventing incompatible land uses from encroaching upon existing and planned land uses.	SCE recognizes that the Mono County Municipal Code identifies mobile and stationary construction noise limits for residential and business properties. As discussed with Mono County staff and Deputy County Counsel on April 30, 2024 (following the public meeting to review the DEC-1 Full Decommissioning Study) and in a follow-up meeting with Mono County Counsel on May 17, 2024, this is a federally authorized project on federal land, and the regulations pertaining to construction noise in the municipal code are not applicable. SCE recognizes that one of the goals of Mono County, as stated in its general plan, is to preserve the county's quiet rural atmosphere by maintaining ambient noise levels and preventing incompatible land uses from encroaching upon existing planned land uses. It is SCE's intention to complete the Project efficiently and in a way that minimizes adverse effects, including noise.
Mono County	Mono-Noise-03	6/7/2024	LAND 2 – Noise Technical Study Report	Contact the Solid Waste Superintendent to discuss waste disposal. TSR §5.2.4 TRUCK USE AND DEBRIS DISPOSAL. This section states that non-hazardous debris will be hauled by transport vehicles to Benton Crossing via the northern route of the SR-158 loop road. County staff have informed SCE that the Benton Crossing Landfill closed at the end of 2023; the Pumice Valley Landfill and Transfer Station now serves as the County landfill. Located approximately 5 miles east of US 395 on Highway 120 East, the Pumice Valley Landfill is overseen by Mono County Solid Waste Division. Capacity at Pumice Valley may be constrained during the timeframe of the Rush Creek Project. The County encourages SCE to timely contact Mono County Public Works Solid Waste Division for further discussion of debris disposal requirements.	The LAND 2 - Noise TSR has been updated to remove reference of transport of debris to Benton Crossing.
Mono County	Mono-Noise-04	6/7/2024	LAND 2 – Noise Technical Study Report	Summary: The noise analysis should include: a cumulative impact of all noise sources operating at the same time, effects of the geomorphology of the canyon on noise attenuation and dispersal, and a full evaluation of the difference in noise generation and impacts for all alternatives. TSR §2-STUDY OBJECTIVES & MONO COUNTY NOISE ORDINANCE. Section 2 of TSR LAND-2 that states the SCE objective to 'characterize ambient and Project-generated noise at sensitive receptor areas (i.e., residences, businesses, and recreation areas) and compare these to applicable state and local noise regulations/ordinances,' with a footnote clarifying that the analysis of potential noise impacts will be included in the license application. SCE's Draft Overview Schedule indicates that the Licensing Process will begin early in 2025 and continue through 2026. Construction on the Rush Creek Project will extend over a four-month period during summer (from June 1 through October 1) throughout the construction process. The construction timeframe is generally described as noted above in §II Introduction and Project Purpose, but the cumulative years of project work is not specified. The Mono County General Plan notes that summer uses, primarily associated with fishing, currently	Regarding cumulative impacts of all noise: The LAND 2 Noise study has been updated to include a figure that illustrates the Lmax associated with single event project-related noise (helicopters, trucks, and construction equipment at the Base of Operations) from the point of origin extending outward to the town of June Lake and surrounding area. This map can be used by stakeholders to better understand the maximum sound levels that may be experienced from each noise source and to identify areas that would be exposed to multiple types of noise in the vicinity of Project activities. Project related construction noise, including that associated with truck trips and helicopter flights, is intermittent and temporary in duration (e.g. during the time a helicopter leaves or returns to the Base of Operations or when a Project-related truck passes near a receptor on SR-158). Therefore, while possible, it is unlikely that there is a location from which a receptor would often, if ever, experience noticeable sound from all Project-related single-event noise sources at the same time and therefore the need to provide a modeled assessment associated with the combined Lmax of all single-event noise sources was not developed. Regarding the effects of the geography of the area and its effect on noise

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
				generate a majority of the community's income. SCE has stated that it will work closely with Mono County through the Mediation and Settlement process to identify alternatives and mitigation measures that will achieve Noise Ordinance standards as closely as is feasible, and to minimize the environmental and economic impacts of this project on the June Lake community. The County intends to work closely with SCE on this consequential effort. TSR §5.1.3 ANALYSIS METRICS AND FREQUENCY WEIGHTING. TSR LAND-2 Section 5.1.3 identifies factors that determine the efficiency of sound transmission and affect potential noise impacts at offsite locations. Factors identified as important include "distance from the source, frequency of the sound, absorbency and roughness of the intervening ground (or water) surface, the presence or absence of obstructions such as buildings and their absorbency or reflectivity, and the duration of the sound." The list does not directly identify topography and landform as key issues, but Mono County CDD anticipates that the natural amphitheater formed by June Mountain, San Joaquin Mountain, Carson Peak, and Parker Peak and the centrally located Reversed Peak, may also have a significant effect on sound transmission in the June Lake loop, including echoes and noise reverberation. Please assess how the volume, area of impact and duration of project-related noise impacts may be shaped by the mountainous geomorphology of this setting.	attenuation and dispersal: The noise model used for helicopters accounts for topography and ground impedance conditions. For more information about the noise model refer to Appendix C of the LAND 2 Noise TSR. Regarding a full evaluation of the difference in noise generation and impacts for all alternatives: The LAND 2 Noise Study focuses on single-event noise and daily noise levels (Leq(24hr) durations) associated with construction activity which is applicable across all alternatives. The analysis considers the average of trips (e.g. helicopter trips) that may be experienced during any one construction day. Each alternative would result in the same estimated Lmax and Leq(24hr) noise levels but would differ in duration of the construction schedule during which this noise would be experienced (e.g. the number of months).
Mono County	Mono-Noise-05	6/7/2024	LAND 2 – Noise Technical Study Report	Summary: Evaluate other alternatives for the Base of Operations site; the County specifies three sites in our comments. The Mono County CDD requests that SCE give more thorough review to three of the alternative sites previously considered but not favored after the initial review: 1) the Hartley Springs area, 2) the industrial site north of Oh Ridge and south of US 395, and 3) the mid-mountain base of operations at June Mountain. Each of these sites appears to be within three miles of the work area, and each has been previously disturbed by historic uses. Most importantly, each of these sites has potential to route helicopter flight paths away from Down Canyon and thereby reduce noise impacts on the June Loop communities (compared to the proposed June Mountain Ski Area Base of Operations). SCE cites road closure and trees as two reasons for disfavoring some alternatives. Sustained helicopter noise potentially has a more significant impact on the community than road closures. The Mono County CDD requests that SCE not prioritize avoidance of road closures over noise impacts without clearly describing the underlying basis and analyzing the impacts of both measures. As far as trees, the USFS proposed alternative, similar to Hartley Springs, also has significant tree coverage that would require some type of site preparation, including and up to removal of trees. If tree removal is considered acceptable at the USFS site, the Hartley Springs site should receive the same consideration to enhance its viability. <u>Factors Used to Identify Suitable Locations for the Base of Operations:</u> The County is sincere in its offer to assist SCE in the review of potential alternatives for the Base of Operations. To facilitate our understanding of technical requirements, please provide responses and information for the following questions: 1. Is there a specified flying elevation that would allow roads to remain open during helicopter overflights?	Refer to response to Mono-Decommissioning-03

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
				2. What are the specific code standards and regulations that require closure of roads close when helicopters fly over? 3. What factors govern the management of road closures including (a) planning to ensure coordinated timing of the helicopter overflight with traffic controls; (b) duration of the road closure; (c) use of staff (e.g., flag-holders and pilot cars) versus use of signal controls; (d) advance public notification of areas subject to closure? 4. Is there a maximum elevation over helicopters cannot fly depending on the weight of cargo load? 5. Is there a certain terrain over which they cannot fly depending on load? 6. What are the staging area requirements (minimum square footage and clear space dimensions) for helicopter landings and cargo loading onto trucks? What is the minimum required separation from the landing area to power lines? To trees of various heights? 7. What are the constraints on selecting the flight patterns and routes? 8. What factors might enable the helicopters to fly behind or over the mountains instead of flying through the Canyon? 9. What are the Base access road requirements? For example, does the access road require two 12' travel lanes? Must it be rated for a certain level of travel? Is paving required, or can it be unpaved? Does the access road need to have a certain weight-bearing capacity?	
Mono County	Mono-Noise-06	6/7/2024	LAND 2 – Noise Technical Study Report	Summary: Answer the list of questions in the County's comments and clarify cargo transport, construction season, no project alternative, and project timeline. - Cargo Transport Alternatives: What is status of the existing tram system for the Rush Creek Project? Are there project activities that could be shifted from the helicopters to the tram system, or an upgraded tram system? What is the role of pack horses and mules, particularly given the wilderness status of much of the project area? Can additional project activities be accommodated by packers? - Construction Season Alternatives: Mono County CDD understands that helicopters may perform more efficiently in colder temperatures. Would helicopter use in the shoulder seasons potentially be more efficient, and necessitate fewer trips, than during the prime summer tourist months? - No Project Alternative: SCE has made comments suggesting that they have an option to withdraw the project or withdraw from the project in some manner. Given the compelling public safety objectives associated with the Rush Creek Project, simply walking away and leaving the dam in a state of potential imminent failure does not seem like a viable option. Please describe the public safety measures that would be taken to secure to dam in the event of a "No Project" alternative.	**Cargo Transport:** The Proposed Action identifies a construction plan that optimizes use of the available material and equipment transportation options available. Helicopters, trams, and mules will all be utilized towards the goal of completing the Project efficiently and safely while minimizing adverse effects to the extent practicable. Specific to the trams: the trams will be repaired and upgraded as part of the Project and will be used during construction to support transport of equipment, personnel and other materials according to their operational capacity. Even with repair and upgrades, the trams approximate maximum capacity is 2,000 pounds. As such the tram may only be used for transport of personnel and lighter materials. In addition, the tram consists of two separate segments that require other modes of transport to get materials between the trams and to the construction site (i.e., boat, helicopter, human transport, mule). This adds physical and logistical challenges resulting in time delays which makes execution too lengthy. **Shoulder Season**: The construction season is determined by the weather and available access to the high-country areas where construction would take place. Additional considerations are related to reducing ground disturbance during inclement weather to prevent erosion and contamination of surface water. **No Project Alternative**: The No Action Alternative is to maintain the Project as operated under existing conditions. SCE is not proposing a "No Project Alternative" in which SCE would "walk away" from the Project.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Mono County	Mono-Noise-07	6/7/2024	LAND 2 – Noise Technical Study Report	Summary: Provide a flowchart of the stakeholder/agency Mitigation and Settlement Agreement process. Based on a cursory review of the 2007 SCE Settlement Agreement for the Big Creek Alternative Licensing Process Hydroelectric Projects, it appears to the Mono County CDD that key elements of the process include meetings with stakeholders, preparation of and comments on required technical reports, and identification of potential impacts that may serve as the basis for a settlement agreement. The agreements do not become part of the new licenses issued by FERC, but are provided to FERC for consideration in FERC's review of cumulative impacts associated with the issuance of new licenses. Mono County's participation in the Rush Creek Project is guided by the responsibility to ensure that project impacts on the June Lake community are held to the absolute minimum while supporting the important public safety objectives of the project. To this end, the Mono County CDD requests that SCE provide a flow chart or written outline of the overall agency/stakeholder Settlement Agreement process.	The 2007 SCE Settlement Agreement for the Big Creek Alternative Licensing Process was unique to that relicensing proceeding. It is unclear at this time whether a similar settlement agreement process will be an outcome of this relicensing process.
Mono County	Mono-Spears-Email-01	6/24/2024	NA	Would you be able to provide debris disposal details planned for this project such as what the estimated amount of non-hazardous construction debris that will be generated? Plan and location for disposal?	Non-hazardous construction debris stockpiled at the Base of Operations would be transported to the Pumice Valley Landfill or another approved disposal site on a daily/weekly basis. Hazardous waste would be hauled by truck, consistent with state and federal regulations, for disposal at an approved hazardous waste disposal site (i.e., Ridgecrest, California; Los Angeles, California; or Beatty, Nevada). Refer to the DLA, Exhibit E, Section 5, Proposed Action and to Appendix 5-1 Project facility Modification Details for more information about the debris disposal quantities. See especially Tables A-3, A-6 and A-10.
Individuals					
Bob Marks	Marks-01	5/20/2024	LAND 2 – Noise Technical Study Report	I wish to comment on Stantec's Land and Noise Technical Study Report (March 2024) and the following in-person meeting held in June Lake On April 30, 2024. In it's September 2022 Technical Study Plan, SCE identified three kinds of noise it would investigate from its powerhouse operations, helicopter use, and construction equipment. In each case, SCE said it would compare noise levels to applicable state and county regulations/ordinances. Its list of references includes Mono County Noise Regulation Mono County Code Chapter 10.16. Stantec's Land and Noise Technical Study Report (March 2024) fails to do that comparison. FERC should require SCE to do what it said in its March 2022 TSP it would compare its projected and modeled noise levels to the applicable ordinance, in this case the Mono County Noise Regulation. At the April 30, 2024 meeting, Matt Woodhall addressed that question by saying that the Mono County Noise ordinance did not apply to helicopter use. That is both silly and insulting. Its proposed Base of Operations is in the June Mountain parking lot, which is most assuredly in Mono County, as are the two projected helicopter flight paths. And those of us who live nearby in Peterson tract will be most affected by noise coming from SCE (or contractors) helicopters. We've been subjected to helicopter noise coming from SCE construction/repair activities on its dams in the past, and it is unpleasant, nerve racking, and bad for our mental and physical health all of which can, and will, be documented if needed.	As detailed in the LAND 2 Noise TSR SCE has conducted a comprehensive analysis of noise impacts associated with the construction activities that would be required under any alternative: construction equipment, truck haul trips, and helicopters. While these analyses indicate that construction activities will have a temporary and brief adverse effect on the soundscape, limited to the construction period, they also identify strategies and measures for reducing this impact. SCE proposes to adopt those measures as part of the Proposed Action. With regard to the comment on the Mono County Noise Ordinance, the FERC-approved study plan only requires SCE to compare Project-generated noise to "*applicable* state and local noise regulations/ordnances" (emphasis added). The County's noise ordinance does not apply in this case, for two reasons. First, the County ordinance by its terms applies only to stationary construction noise limits for residential and business properties—and not mobile sources of noise for non-residential and business purposes. The type of noise produced by helicopters passing overhead is quite different than the type of noise produced by stationary equipment, and therefore the Noise Ordinance is not a valid comparison to the type of noise that will be produced under the Proposed Action. Second, because the Project is a federally licensed facility under the Federal Power Act, state and local laws do not apply—particularly those that would purport to place additional burdens on the federally licensed activity.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
David S. Rosky	Rosky-01	6/10/2024	LAND 2 – Noise Technical Study Report	Summary: In summary, the following requests are made regarding the powerhouse noise portion of the LAND-2-Noise study: 1. That powerhouse noise study data be presented to stakeholders with sufficiently high spectral resolution to accurately characterize tonal noise, as shown in the example of the second chart above. If insufficient spectral resolution was recorded, some measurements should be retaken, enough to characterize the actual spectral content of the noise. 2. A psychoacoustic evaluation of the noise should be performed to avoid an oversimplified conclusion of the degree to which the noise may cause stress or discomfort based only on absolute amplitude or loudness. The spectral resolution of the powerhouse noise measurements, at least as presented in the study report, are inadequate to discern the type of noise which is the cause of greatest concern in the vicinity of the powerhouse. The study report presented noise measurement result graphs with a spectral resolution of one-third of an octave. This resolution is inadequate to fully discern and characterize narrow-band tonal noise, a type of noise which human perception is extremely sensitive to. From a psychoacoustic perspective, a tonal noise that is well below the noise floor can be easily perceived, and if it is audible and present for long periods of time, can have significant negative psychological impacts. The presence of audible narrow-band tonal noise can be considerably more important than the magnitude of such noise relative to other non-tonal noise, such as white or pink noise, that may be present. During certain operational conditions, highly audible tonal noise is emitted from the tailrace exit of the powerhouse, particularly when power is being generated at lower flows. The presence of this was captured to some degree in the study measurements, but not to a degree necessary to characterize its possible impacts.	In regard to powerhouse noise: The LAND 2 Noise TSR filed with the Final License Application will include a finer resolution of the frequency spectrum of the noise emanating from the powerhouse, in a format similar to the example provided by the commenter. In regard a psychoacoustic evaluation of powerhouse noise: The details of the noise Technical Study Plan (TSP) were developed iteratively based upon stakeholder input in 2023, which included changes to: add measurement points of interest near residences; add measurement points of interest at various angles from the powerhouse tailrace; and add an additional “no power generation” measurement condition. Because the LAND 2 Noise Technical Study Plan did not specify preparation of a psychoacoustic evaluation and no such request was made during development of the Technical Study Plan, this request falls outside of the scope of work of this study. In addition, a psychoacoustic evaluation is not needed for NEPA and FPA purposes and won’t inform the development of license conditions.
David S. Rosky	Rosky-02	6/30/2024	LAND 1 – Aesthetics Technical Study Report	Dear Mr. Woodhall, I appreciate the opportunity to submit the following comments on the AESTHETICS study report for the relicensing of the Rush Creek Project. Mono County has submitted detailed comments regarding this Study Report, all of which I agree with and corroborate, though I would like to add a comment regarding Horsetail Falls, which the County's comments only touched briefly upon. These comments are regarding the portion of the study in which images of Horsetail Falls were made to assess its aesthetic value under several conditions of instream flow. These comments are to bring forth concerns over aspects of the images presented in the Technical Study Report. I. Horsetail Falls As Mono County points out in its comments, the viewscape of the Highway 158 corridor is intimately tied to the area's economy. Horsetail falls is a significant element of the June Lake Loop viewscape. During times in spring and early summer, when the falls have a seasonally appropriate amount of flow, many people are attracted to the Loop to view them, which indirectly enhances the area economy. Part of the study plan is to assess the aesthetic value of the falls at various different flows from several points of interest. Several of the photos included in the Study Report are not of full utility to achieve this goal. In many cases, the angle of view is so large that the waterfall is extremely small in the image. Such a wide angle view is useful, as it helps to determine how the falls look in a full view context, but such a view makes it difficult to assess the actual character of the falls which could be obtained with a narrower view image. Assessing this is important since the aesthetics, i.e., the amount of instream flow which is allowed over the falls, needs to be traded off against the amount of water retained for generation.	To characterize Horsetail Falls under various flow conditions, two Key Observation Points (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. The KOP from SR 158 represents the view of Horsetail Falls experienced by passersby along the highway who, consistent with the captured photos provided in the LAND 1 TSR, experience the falls in the context of the full landscape. The second KOP is much closer to the falls and as such the falls comprise a larger portion of the foreground and middleground from that viewpoint. The photos captured comply with the approach identified in the TSP and approved by FERC in its Study Plan Determination. The falls were documented from the established KOPs using the same camera/lens settings and view angle during each flow. As such, SCE believes the photos sufficiently capture the visual character of the falls at different flows.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
David S. Rosky	Rosky-03	6/30/2024	LAND 1 – Aesthetics Technical Study Report	In addition, some of the photos presented in the study report contain a significant amount of glare due to be taken at low angle looking toward the sun, for example photo #5 showing the falls from a distance with 9.1 CFS flow rate. In this photo it's difficult to discern what the falls look like from the point of interest.	SCE recognizes the photo taken from the road on August 6, when the flows over the falls were running at approximately 9.1 cfs, includes a substantial amount of glare. However, the TSR includes a photo of the falls from the same location and at a similar flow (10.8 cfs) taken on October 8. The difference in the visual experience from the same location and of a relatively similar flow is discussed in the text: *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. As an example, the falls at around 9 cfs while visible in the photo taken on August 6, 2023, are not as visually prominent against the landscape backdrop as they are from the same location in mid-October when flow conditions were relatively similar (10.8 cfs) but when the sun was lower in the sky.* In addition, the TSR included in the DLA includes a third set of photos of the falls at the same relative flow: 9.6 cfs on August 4. These three sets of photos on Aug 4, Aug 6 and on October 8 satisfy the intention of capturing photos of the falls in a flow range just above minimum flow.
David S. Rosky	Rosky-04	6/30/2024	LAND 1 – Aesthetics Technical Study Report	The following requests are made: 1. At this time a request is made that SCE provide the full resolution RAW files for all of the images taken for this part of the study as recorded by the camera(s). This may allow greater enlargement of details, and greater dynamic range for processing some of the images which contain a significant amount of glare. This would provide additional insights not available from the images published in the PDF report.	As noted above, the LAND 1 - Aesthetics TSR includes multiple photos of the falls in the range of 8-10 cfs. SCE can provide the original photos if there is still interest following publication of the TSR.
Jim Mahoney	Mahoney-01	6/3/2024	DEC 1 – Full Decommissioning Study	At the meeting in June Lake on April 30th, we raised the question of whether a study and cost analysis had been performed to evaluate the possibility of retrofitting Rush Meadow, Gem and Agnew dams to meet current earthquake standards to allow for greater flood protection and water storage for the June Lake area. I believe the answer was “yes” and it was “more expensive” than the other proposed alternatives, even full decommissioning. It seems now that further studies are being conducted to evaluate potential flooding and sediment flows from the proposed dry lake beds, a review of the retrofitting costs to alleviate the possible flooding and sediment issues makes sense. With the understanding that retrofitting all 3 dams may be cost-prohibitive, retrofitting Gem alone to allow for maximum storage may be a cost-friendly alternative to solve for flooding and other issues.	The Proposed Action is to retrofit Gem Dam to allow for storage under seismic restrictions.
Jim Mahoney	Mahoney-02	6/3/2024	DEC 1 – Full Decommissioning Study	Friends of Silver Lake hereby requests you provide to all Stakeholders the study and cost analysis SCE conducted for retrofitting each of the dams to meet earthquake standards and thereby increasing storage, flood protection and minimizing sediment release downstream. We believe that, while we can make a FOIA request to FERC for this information, having SCE provide the information directly to Stakeholders will help avoid any delays in the application process.	SCE has not prepared an analysis in the ongoing FERC relicensing for the Rush Creek Project of the cost of potentially retrofitting and maintaining Rush Meadow and Agnew dams, as compared to removing this infrastructure (nor has any comparison been made in the FERC proceeding for retrofitting Gem Dam to allow for maximum storage). As an initial matter, the FERC-approved study plan requires no such analysis. In addition, due to the modifications made to Agnew and Rush Meadows dams, SCE has made the business decision to remove Rush Meadow and Agnew dams as part of its relicensing proposal and to only retrofit Gem Dam to the current surface water level seismic restriction (as described in the Proposed Action for the Project). Conducting an analysis of the theoretical costs to retrofit Rush Meadow and Agnew and maintain them over the next 30- to 50-year license term is not a relevant consideration in the FERC relicensing effort and will not inform FERC’s environmental analysis, because SCE has no intention to retrofit these facilities and return them to service in their original configuration or maintain them over the next FERC license term.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Kendrick Taylor	Taylor-01	5/16/2024	LAND 2 – Noise Technical Study Report	Summary: The noise study (FERC Project No. 1389, Land 2) is flawed because the model study uses ground impedances that result in an under estimate of the noise levels. These comments are related to the SCE relicensing application on Rush Creek, docket number P-1389 and the Full Decommissioning Study (March 2024). I have a house in the Peterson track and the helicopter noise from this project will be intense. The noise study (FERC Project No. 1389, Land 2) is flawed because the model study uses ground impedances that result in an under estate of the noise levels. The ground impedances are set in a pulldown menu in the BaseOps model. In this study the modelers used two acoustic impedances, one for water, and one for soft ground such as grass (see page 8 of Noise study). The area covered by water is small and has negligible effect on the result. All other areas are designated as a soft surface, not exposed rock such as exists on Carson Peak and the cliffs northwest of the June Mountain. Changing the modeled surface from grass to the actual rock surfaces would increase the noise (see page 106 of the BaseOps Manual https://www.denix.osd.mil/dodnoise/denix-files/sites/99/2024/01/BaseOps_User_G uide.pdf). The model also does not account for reflections (https://www.denix.osd.mil/dodnoise/denix-files/sites/99/2024/01/BaseOps_User_ Guide.pdf) off rock such as the vertical rock face of Carson Peak that is ABOVE the flight path and the rock face to the northwest of the June Mountain. The model also does not account for the increased noise associated with stabilizing an exterior load during final approach. The model understates what the noise will be because the modeling parameters are not representative of the actual conditions.	The LAND 2 Noise TSR has been updated to include additional ground impedance detail. Additional information about local ground impedance data used to determine noise levels and other information about the noise modeling software is now available in Appendix C to the Land 2 Noise TSR. SCE recognizes that helicopter noise is a temporary and brief adverse effect of the project. SCE's Proposed Action sets forth several proposed measures to reduce and mitigate the adverse effects of noise caused by helicopter flights.
Kendrick Taylor	Taylor-02	5/16/2024	DEC 1 – Full Decommissioning Study	The number of helicopter round trips is large, up to 12,074 in the full removal option (see Full Decommission Study, March 2024, tables 2-11). This understates the total number of overflights for two reasons. First, because each round trip will result in two overflights of my neighborhood. Second, it does not include flights for restoration or moving equipment to the dam sites. Hence the total number of overflights will exceed what is stated in the report by more than a factor of two. Most of these flights (84%) will be with a skycrane helicopter with noise levels that will exceed 80 dB in my neighborhood. The house rattling noise of 24,000 overflights during 10 summers will make our neighbor nearly unlivable and will greatly affect the use and value of our homes. It will also have a large detrimental impact on our tourist based economy.	SCE understands the concern expressed regarding the number of helicopter flights and noise impacts to local residents. Among alternatives considered, SCE's Proposed Action is the alternative with the least number of helicopter flights, while the full decommissioning option is the alternative involving the largest number of helicopter flights. The DEC 1 Study associated with the full decommissioning option was prepared at the request of the Forest Service and as directed by FERC as part of the study plan determination process. The DEC 1 study provides the most accurate estimates for helicopter flights and types available based on the actions associated with full decommissioning.
Kendrick Taylor	Taylor-03	5/16/2024	LAND 2 – Noise Technical Study Report	The draft application does not address if the noise will be in compliance with Mono county ordinances and what will happen if the Mono County noise ordinances are exceeded	Refer to response to Marks-01.
Kendrick Taylor	Taylor-04	5/16/2024	DEC 1 – Full Decommissioning Study	The proposed options only consider removing dam debris via helicopter. Using helicopters to move the debris has two major problems. First, the noise impacts to the residents and business in June Lake will be overwhelming for up to ten summers. Second, there is a conflict between SCE use of the June Mountain Parking lot and June Mountains summer operations. June Mountain has stated the SCE operations will create logistic conflicts with summer operations and has not agreed to this. The proposed SCE operations and June Mountain operations both require a USFS special use permit and are in conflict. Smaller SCE helicopter operations have been coordinated with June Mountain, but the magnitude and duration of the proposed activities are more than ten times previous SCE operations. There needs to be a plan to manage this conflict before the proposed options can be considered.	SCE understands the concern with the number of helicopter flights and noise impacts to local residents. It is SCE's intention to complete the Project efficiently and safely and in a way that minimizes adverse effects, including noise impacts. SCE will consult with the Forest Service on use of the June Mountain Ski Area parking lot as the Base of Operations. SCE understands that a Special Use Permit will be required.

Commenter	Comment No.	Date Received	Study Plan	Comment	SCE Response
Kendrick Taylor	Taylor-05	5/16/2024	DEC 1 – Full Decommissioning Study	I request that two other options be considered. The first additional option is to removing material via an upgraded tram. Eighty years ago the tram was used to move material up to build the dams, an upgraded tram can be used to move the dam debris down. SCE has been reluctant to seriously consider this option.	SCE's intention is to complete the Project efficiently and safely while-minimizing adverse effects to the extent practicable. The trams will be repaired and upgraded as part of the Project and will be used during construction to support transport of equipment, personnel and other materials according to their operational capacity. Even with repair and upgrades, the trams have the following limitations which make them infeasible as the primary or singular means for transporting material and equipment. - Approximate maximum capacity of the tram is 2,000 pounds. As such the tram may only be used for transport of personnel and lighter materials. - The tram consists of two separate segments that require other modes of transport to get materials between the trams and to the construction site (i.e., boat, helicopter, human transport, mule). This adds physical and logistical challenges resulting in time delays which makes execution too lengthy.
Kendrick Taylor	Taylor-06	5/16/2024	DEC 1 – Full Decommissioning Study	The second additional option is leave more material on the mountain. The concept would be to excavate a hole and stockpile the material from the hole. The hole would then be filled with debris from the dams. The stockpile material would be used to cover the debris and restore the site. It may be that this approach has fewer environmental impacts than 24,000+ flights with a massive helicopter. Both of these additional options would greatly reduce the helicopter impacts on my community and allow for management of conflicts with June Mountain summer operations.	SCE's Proposed Action includes partial removal of Rush Meadows and Agnew dams and retrofitting of Gem dam which does not include export of demolished material (Refer to Section 5.0, Proposed Action). All demolished material under the Proposed Action would be reused onsite.

Stakeholder Comment Letters

This Page Intentionally Left Blank

INYO National Forest Comments on
DEC 1 Full Decommissioning Study Phase 1, Rush Creek Hydroelectric Project No. 1389

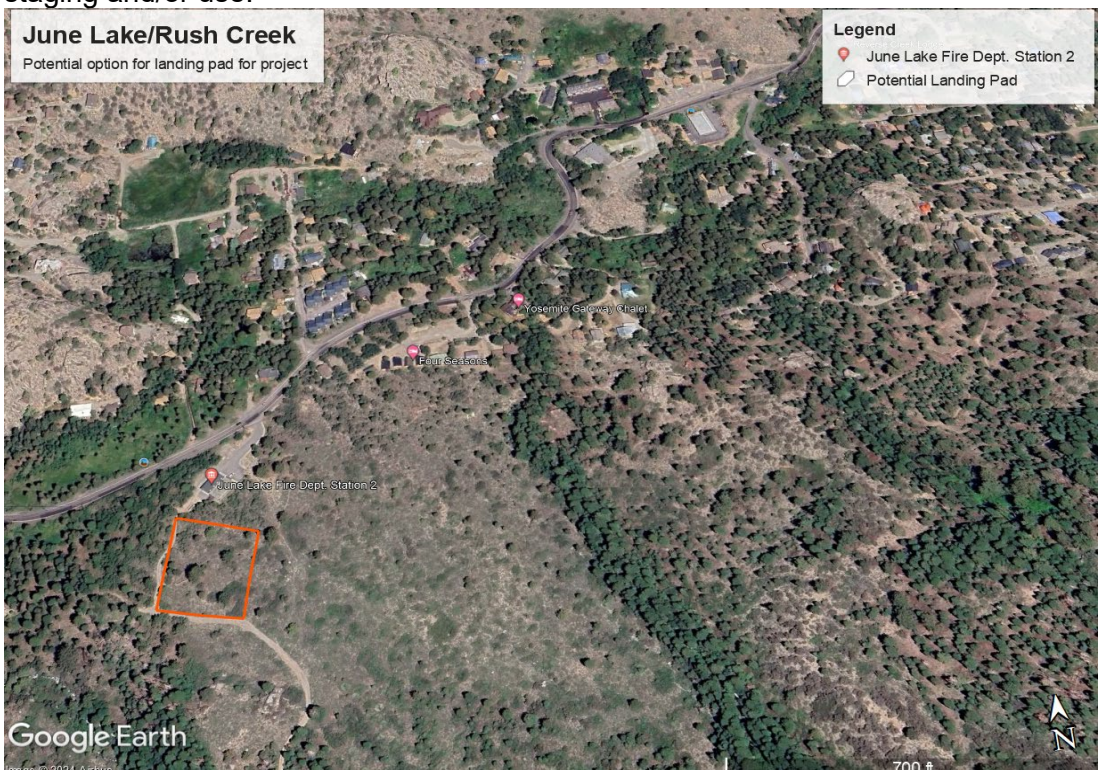
This letter provides Forest Service comments on Southern California Edison's (SCE's) DEC 1 Full Decomissioning and Land 1 Study for the Rush Creek Hydroelectric Project, Federal Energy Regulatory Commission No. 1389 (Rush Creek or Project). We appreciate this opportunity to provide early feedback on SCE's study.

Regarding DEC 1, we believe the following refinements, changes, or information are necessary to improve the report.

General Comments:

- We suggest that the study update all maps to include the Ansel Adams Wilderness boundary for reference purposes, and to use more distinguishing colors or patterns that differentiate various land uses or ownership from one another.
- When describing the relevant authorization for the proposed construction and/or decommissioning activities (ground disturbing activities) of the associated facilities described within Wilderness, the report should describe the need to evaluate such activities using a Minimum Requirements Analysis (see the Minimum Requirements Analysis Framework (MRAF) template and instructions) and approval by USFS. DEC 1 construction estimates will help inform the potential volume of motorized/mechanized equipment/facilities that may be approved for each activity. Any heavy equipment will require Chief's level approval (**FSM 2326.04a).**
- For all but the full-removal alternative, components of the dams and associated facilities and structures would remain in place. Partial removal would leave dam abutments in place and reuse demolished concrete on site as fill removal. The report should include visual renderings of both decommissioning alternatives, as well as SCE's proposal from various photo point locations to determine potential aesthetic and visual impacts.
- For either decommissioning alternative, the plan should describe the disposition of the Rush Creek Powerhouse and other project associated facilities.
- This study should include a description of how SCE will address hazardous waste handling, stockpiling, fuel containment, and/or transport for all construction activities. At a minimum SCE should provide a list of the best management practices for each scenario and use.
- The study should include an updated analysis which identifies alternative temporary helicopter landing sites, potential alternative flight paths, and/or staging areas to the June Lake parking area. When investigating alternative construction staging or landing areas, the analysis should consider the potential for reducing noise impacts, potential to reduce traffic and associated impacts, and be serviceable if limitations or constraints preclude the use of the June Lake parking lot. This analysis should identify all locations SCE considered in their engineering estimates, the rationale or criteria SCE used to eliminate sites for consideration and include updated engineering estimates for vehicle traffic and load estimates for alternative sites for comparison purposes.
    - One potential alternative landing site (which would require some improvements) is an unimproved area adjacent to the June Lake Fire Department Station No. 2. Seen below. We believe this site may be suitable for improvements to service

SCE's helicopter construction needs, potentially beyond for community helicopter staging and/or use.



- The study should more accurately describe and identify the potential locations and construction of staging areas for the mule teams, including any improvements or repair of trails necessary to address mule construction activities.
- Regarding the engineering estimates for on-site personnel, existing structures may be upgraded to serve as quarters and sites that are utilized should include bear-safe food storage, and a description of waste containment and removal procedures. Once completed, and if decommissioning alternatives are pursued, the study should describe the steps necessary to remove any improvements and remediate these areas.
- Excavation – excavator use is associated with all alternatives; however size of excavators and amount of use varies. Any updated engineering estimates should include all the heavy machinery calculations and general descriptions of the size of machine used/considered for analysis purposes.
- It is assumed that the dewatering and associated installation of temporary cofferdams would require the use of motorized pumps/motorized boats. The project description should confirm this assumption or explain how water would be removed from the interior cofferdam areas.
- Beyond the immediate construction areas, the study should describe whether any erosion control and stabilization of former lakebeds is anticipated.
- The study should include all relevant preconstruction best management practices to reduce and control the introduction or spread of invasive species from construction related activities.
- While not included in this study, an updated report should include a description of any revegetation efforts to rehabilitate or restore formerly inundated zones to their natural state.

- The study identifies potential closure of areas and trails to the public. This should acknowledge a reduction in potential wilderness permits and use is anticipated. Affected trails may include Rush Creek Trail, Clark Lakes Trail, Spooky Meadows Trail, and Weber Lake Trail. Closure timelines should be included for impact analysis purposes. An updated report should describe the time estimates these areas would need to be closed to the public, including any potential remediation of trails.
- The plan should identify the specific decommissioning and/or restoration of project specific trails segments from the proposed activities.

Comments by Section Number:

1.2.1: Use of June Mountain Ski Area (JMSA) for operations will require a separate Special Use Authorization. The proposed use will interfere with the current permit. Adjustments will need to be made to accommodate currently permitted summer uses at JMSA and other locations should be considered as per the general comments above.

1.3.2: The report should explain why the use of the Agnew and Gem trams cannot be used to support or alleviate the dependence of helicopters to transport personnel, equipment, or other materials. Additionally, if either decommissioning scenario moves forward, the plan should explain or include details about whether SCE intends to remove these features and include the steps necessary to remediate the lands along the tramway alignment.

1.3.4: The report should provide a more comprehensive estimate or timeline to describe the post-construction restoration activities. Additionally, SCE should explain what criteria it suggests should be utilized to ensure that restoration objectives are fully met and that no additional remediation efforts are necessary. The plan should provide a greater level of detail in what will be included in the “conceptual restoration plans.” At a minimum these plans should include the monitoring of post restoration activities that relate back to the restoration criteria or objectives.

1.4.3.3: The report should clarify that the construction timelines do not run concurrently, and that the activities are done sequentially.

1.6: “Wilderness Act Variance” for the project will require USFS authorization. Regarding the partial decommissioning alternative, this option should also consider the removal of all demolition debris within the wilderness, and the reduction of additional equipment or material imported (such as shotcrete) to permanently encase features in the wilderness in the engineering calculations.

Land 1- Aesthetics

6.2.2: SCE contends that the Scenic Integrity Objectives included in the 2019 INF LRMP, which include the project area, do not apply to project facilities because they pre-date the adoption of the Scenery Management System. The Forest notes that the LRMP is the guiding document for management of the INF with respect to this project and scope of activity. Compliance with the LRMP with regards to scenery and aesthetics is an area each alternative must address. Effects of proposed options in the decommissioning study should explain how they will affect or address meeting LRMP SIOs. As we suggested in the general comments, SCE should include in the DEC or Land 1 study visual renderings of the various options under consideration.

Mono County
Community Development Department

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
www.monocounty.ca.gov

27 June 2024

Southern California Edison Company
Attention: Matthew Woodhall, Generation-Regulatory Support Services
(matthew.woodhall@sce.com)
1515 Walnut Grove Avenue
Rosemead, CA 91770

SUBJECT: Comments on Technical Study Report (TSR) LAND-1 Aesthetics
Rush Creek Project Relicensing Project, FERC P-1389

Dear Mr. Woodhall:

The Mono County Community Development Department (CDD) appreciates the opportunity to submit comments on SCE's Rush Creek Project Technical Study Report (TSR) LAND-1: Aesthetics. Our project understanding at this time is based on information provided on the SCE and Federal Energy Regulatory Commission (FERC) eLibrary project websites, TSR LAND-1 (Aesthetics) and other technical study reports provided by SCE, information gained at the 30 April 2024 and 4 June 2024 meetings, and additional information obtained through email and telephone communications with Mr. Woodhall. Based on these sources, we have developed a number of comments concerning TSR LAND-1 (Aesthetics), as presented in this letter. County comments on TSR AQ-2 (Hydrology) and TSR DEC-1 (Full Decommissioning) will be submitted separately before the review period closes (on 25 July 2024 and 4 July 2024, respectively) for those reports.

Please do not hesitate to contact me if you have questions about any of the comments or information provided in this comment letter. I can be reached via telephone (760.924.1814) or email (wsugimura@mono.ca.gov).

Sincerely,

Wendy Sugimura

Wendy Sugimura
Mono County Community Development Director

I. MONO COUNTY CDD COMMENTS ON TSR LAND-1: AESTHETICS

Background. TSR LAND-1 (Aesthetics, page 1) lists five 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 (USFS) 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.

Based on these objectives, TSR LAND-1 identifies five areas to be studied including (1) Rush Meadows Dam area, (2) Gem Dam area, (3) Agnew Dam area, (4) Rush Creek Powerhouse, and (5) Horsetail Falls. Within these five study areas, a total of 17 Key Observation Points (KOPs) were selected for preparation of schematic renderings to depict existing conditions and post-project conditions (including project options).

The resulting visual renderings provided in TSR LAND-1 (Aesthetics) are well prepared, and helpful in visualizing existing conditions and future options for the identified study area facilities. Mono County requests that SCE apply the same objectives, and give the same level of analysis and visual assessment, to other critical project components including the planned June Mountain Ski Area parking lot base of operations (the 'Base').

Proposed Base of Operations. As shown below, the proposed Base site is located directly adjacent to SR-158 and at the terminus of North Shore Drive. SR-158 is a County-designated Scenic Highway that serves as a main artery for June Lake residents and tourists, and strongly influences initial visitor perceptions of the community as a whole. North Shore Drive is an arterial alternative to SR-158, providing access from Oh! Ridge and the Village area to the ski area base.

Proposed June Mtn. parking lot Base of Operations

Facilities at the future Base are described by SCE[1] as including a wide range of heavy industrial materials and equipment:

- Skycrane Helicopter, Heavy Lift (11,000-lb. load capacity)
- Modified Black Hawk Helicopters, Moderate Lift (6,000-lb. load capacity)
- A-Star 350, Light Lift Helicopter (2,500-lb load capacity)
- Helicopter landing site with k-rail barriers and fuel storage tanks with secondary containment
- Staging Area for storage of construction equipment and materials
- Helicopter Fuel Storage Tanks (including secondary containment)
- K-rail Barriers (control access to landing sites)
- Office Trailers (1 for SCE project management and 1 for contractor construction personnel)
- 25-kW Generators (2 total—one for each office trailer)
- Shipping containers (several, to secure smaller construction materials and equipment)
- 10-wheel dump truck
- 20-foot cargo van
- Type 6 Fire Engines (minimum 300-gallon capacity) with fire suppression equipment, fire box and water tender with a minimum 50-feet of hose
- Cat 313 Excavator
- Cat 950 Loader
- Telehandler Forklift
- Stockpile area to temporarily storage materials removed from the construction sites prior to transport to an approved disposal site. The site will have specific locations designated for hazardous and non-hazardous materials and ultimate disposal location.
- General parking area for use by project managers, construction personnel, subcontractors and other support personnel as well as a designated area for construction equipment parking
- **Additional Materials:** Concrete Flight Buckets, Debris Boxes, Concrete Waste Bin, Street Sweeper, Sanitary Facilities (port-a-johns, number to be determined), Security Kiosk (with 24-hour personnel during the construction season

Mono County CDD has not seen a site plan showing where these facilities would be placed. However, the extensive list of equipment and materials suggests that planned facilities will occupy most or all of the Base area parking lot. Mono County requests that SCE provide a detailed site map depicting the layout of facilities on the Base site, with clear identification for each use, to determine whether any portion of the lot would remain available for typical community uses (see below) and aid in the assessment of visual impacts.

Compliance with Mono County General Plan. The June Mountain parking area supports a wide range of summer recreational uses. These uses are integral to the June Lake economy. The Ski Area's J1 chairlift is an important anchor for summer uses, providing public access to the June Mountain Chalet scenic overlook. The scenic overlook at the Chalet is a popular location for summer weddings and receptions, which often require long-term planning. The parking lot provides overflow parking for hikers and cyclists, and serves as a staging

[1] Source: TSR DEC-1 (Decommissioning).

area for special event parking. The June parking area has in the past also served as a stop for summer transit operations.

Moreover, the proposed Base site is visible to the public from a wide range of vantage points. These include not only the June Mountain Chalet scenic overlook, but also a host of area trails that are used for summer hiking and biking and various points along SR-158, a County-designated scenic highway.

The Mono County General Plan elements provide policies and actions to guide land use planning and achieve communities' long-term goals and vision for the future. Scenic resources are addressed in the 2015 Mono County General Plan Conservation and Open Space Element through Goal 20 (Protect and Enhance the Visual Resources and Landscapes of Mono County). Several policies that support Goal 20 are relevant to the Rush Creek Project:

- *Action 20.A.1.a. Identify important scenic resources, including scenic highway corridors, in the MEA (Master Environmental Assessment).*
  Discussion: SR-158 is a designated scenic highway and an important scenic resource for June Lake and the County as a whole.

- *Action 20.A.2.a. Work with federal, state, local, and other appropriate organizations to review and coordinate the protection and enhancement of the county's scenic resources.*
  Discussion: Preparation of visual simulations for the June Base area will equip SCE and Mono County to jointly identify alternative layouts, management tools, and screening options to minimize or avoid impacts to the scenic corridor and to uses that will be visible to the public from various locations. The Conservation/Open Space Element appendices contain design guidelines for screening.

- *Action 20.C.1.a. Future development projects with the potential to have a substantial, demonstrable negative aesthetic effect shall provide a visual impact analysis prior to project approval. Examples of a substantial, demonstrable negative aesthetic effect include reflective materials; excessive height and/or bulk; excessive night lighting (and other elements).*
  Discussion: Although the Base site is not a 'future development project,' it has clear potential for substantial negative aesthetic effects, as defined, and a timeframe that could extend over a decade of consecutive summer construction seasons (and also peak tourist season in June Lake). Preparation and analysis of visual simulations for the Base is a critically important task to identify mitigations to address adverse project impacts on the visual resources that support the June Lake economy.

- *Action 20.C.3.d. Apply to SCE for financial support to convert eligible overhead lines to underground utilities.*
  Discussion: Overhead power lines have been cited by SCE as a constraint in the identification of alternative sites for the Base. Mono County would welcome the opportunity to explore with SCE the feasibility of obtaining financial support to 'underground' area power lines and thereby enhance the feasibility of alternative locations for the Base (away from the June Lake community) while reducing area fire risk and implementing General Plan policy.

June Lake Area Plan. Equally relevant to the project are goals and policies in the 2015 June Lake Area Plan. This Plan provides a comprehensive, integrated, and internally consistent guide for policy decisions and development in June Lake through 2030. The discussion of **Community Development** states, in the discussion of Community Design Issues (page 9), that the "*Loop's built environment has a close physical association with SR 158, which strongly influences initial visitor perceptions of the community 158*". Community Design Goal 5 is

to "*Maintain and improve the visual quality of the June Lake Loop's environment by enhancing existing structures, guiding future development and preserving scenic views*." Objective 5.B (page 23) addresses visual elements, including Policy 2 to "*protect and enhance, where feasible, scenic vistas from SR 158 and other viewing areas"*. Relevant supportive measures include:

"*Policy 5.B.2. Protect and enhance, where feasible, scenic vistas from SR 158 and other viewing areas"*

"*Action 5.B.2.a. Promote appropriate visual screening of project proposals within significant view areas of SR 158 and major and minor features of the natural environment. This may include the use of natural and built visual barriers, breaks or screens such as landforms, berms and vegetation.*

"Action 5.B.2.f. Where feasible, work with Southern California Edison to underground, relocate or visually screen power lines and other facilities in areas of high visual quality. Lines and facilities crossing, running adjacent to or visible from SR 158 and the West Village/Rodeo Grounds should receive priority consideration".

Thus, compliance with the Mono County General Plan policies would require management of the visual impacts of an industrial use at the June Mountain Base site.

Recommended Additional KOPs. The Rush Creek project is a large and long-term undertaking that will occur in a small community that is economically dependent on summer recreation and for which SR 158 is the sole through-arterial highway. Due to its central location within the loop, the proposed June Mountain Base of Operations has potential for significant adverse impacts to the visual and recreational resources on which the June Lake economy is based. These potentially significant impacts cannot be mitigated unless they are first analyzed with the careful consideration already given to the dam areas. For this reason, TSR LAND-2 (Aesthetics) should be expanded to include visual simulations and analyses for KOPs associated with the proposed June Mountain Base of Operations.

The four KOP locations recommended by Mono County for the expanded study simulations include:

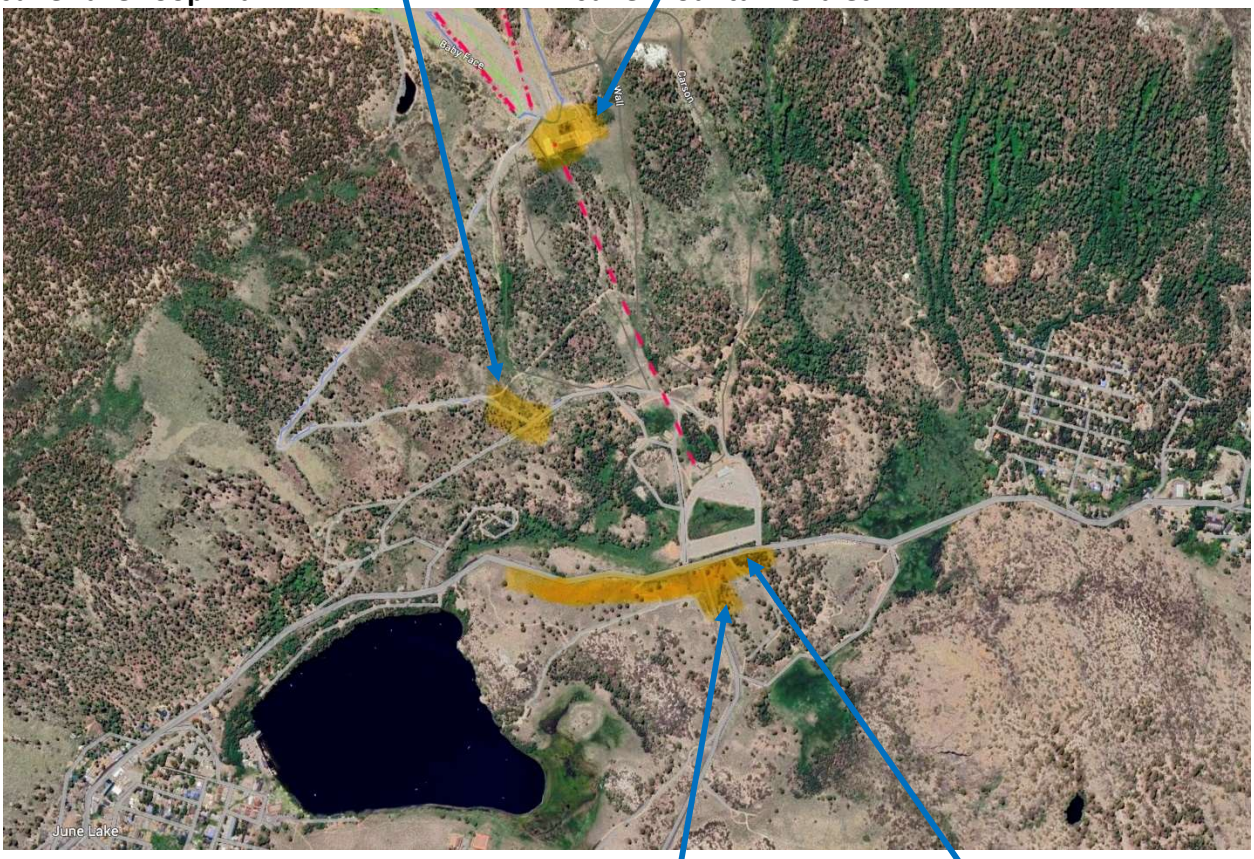
(1) June Lake Loop Trail
(2) Mid-Chalet on June Mountain (where events are held and scenic chairlift rides terminate)
(3) Scenic Highway 158 (viewing west on approach to the ski area parking lot)
(4) North Shore Drive (where it approaches from the Rodeo Grounds property).

A map is provided on the following page to show the general vicinity of these recommended KOP locations. Each of the identified sites will require field verification to determine the most representative viewpoint.

Relationship between Aesthetics and the June Lake Economy. Mono County requests that SCE provide access to the TSR on Socioeconomic Effects. As described in this comment letter, the economy of June Lake is deeply entwined with the aesthetic values of June Lake, as well as existing and future land uses in the vicinity of the proposed Base site. Potential socioeconomic ramifications of the project must be timely understood in order for June Lake residents and businesses to prepare in advance, minimize losses and, ideally, identify and respond to any potential economic opportunities. Mono County looks forward to working with SCE and the June Lake community to ensure that these goals are met.

MAP SHOWING ADDITIONAL RECOMMENDED KEY OBSERVATION POINTS

June Lake Loop Trail **June Mountain Chalet**



North Shore Drive at the Rodeo Grounds property

Scenic Highway 158

Closing. The additional analyses and simulations will enable SCE to mitigate or avoid impacts at the June Mountain Base site through design, layout, screening, safety features, and other means. Such analysis should also include similar assessments of alternative base locations. The alternative base locations suggested in our Noise TSR comments would likely avoid the visual impacts to the June Lake Community. If results indicate that impacts to aesthetic resources cannot be substantively reduced at the June Mountain Parking Lot, that finding will point to the need for meaningful consideration of alternative locations for the proposed Base of Operations.

Document Accession #: 20240702-5041 Filed Date: 07/02/2024

Mono County
Community Development Department

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
www.monocounty.ca.gov

1 July 2024

Southern California Edison Company
Attention: Matthew Woodhall, Generation-Regulatory Support Services
(matthew.woodhall@sce.com)
1515 Walnut Grove Avenue
Rosemead, CA 91770

SUBJECT: Comments on Technical Study Report (TSR) DEC-1 Full Decommissioning
Rush Creek Project Relicensing Project, FERC P-1389

Dear Mr. Woodhall:

The Mono County Community Development Department (CDD) appreciates the opportunity to submit comments on SCE's Rush Creek Project Technical Study Report (TSR) DEC-1: Full Decommissioning. Our project understanding at this time is based on information provided on the SCE and Federal Energy Regulatory Commission (FERC) eLibrary project websites, TSR DEC-1 (Full Decommissioning) and other technical study reports provided by SCE, information gained at the 30 April 2024 and 4 June 2024 meetings, and additional information obtained through email and telephone communications with Mr. Woodhall. Based on these sources, we have developed a few brief comments concerning TSR DEC-1 (Full Decommissioning), as presented in this letter. County comments on TSR AQ-2 (Hydrology) will be submitted separately before the review period closes on 25 July 2024.

Please do not hesitate to contact me if you have questions about any of the comments or information provided in this comment letter. I can be reached via telephone (760.924.1814) or email (wsugimura@mono.ca.gov).

Sincerely,

Wendy Sugimura

Wendy Sugimura
Mono County Community Development Director

MONO COUNTY CDD COMMENTS ON TSR DEC-1: FULL DECOMMISSIONING

1. DECOMMISSIONING ALTERNATIVES

The summary table below was prepared by Mono County to facilitate internal staff comparison of the alternatives described and analyzed in TSR DEC-1. As described in TSR DEC-1, the alternatives consist of two options for Rush Meadows and Agnew dams (full dam removal and partial dam removal), and three alternatives for Gem Dam (full dam removal, partial dam removal, and dam retrofitting). SCE identifies the partial dam removal of Rush Meadows and Agnew Dams, and the retrofit option for Gem dam, as its preferred alternatives.

DEC-1 COMPARISON OF ALTERNATIVES' CHARACTERICS

	ALL DAMS PARTIAL REMOVAL	ALL DAMS – FULL REMOVAL	GEM RETROFIT (+ PARTIAL Removal Agnew & Rush)	GEM RETROFIT (+ FULL Removal Agnew & Rush)
Number of Construction Seasons	7	**10**	5	7
On-site Use of Demolition Material (cy)	22,001	**0**	13,999	10,198
Export of Demolition Material (cy)	0	**28,294**	0	5,594
Import of Concrete/ Shotcrete (cy)	560	**0**	2,452	2,362
Helicopter Trips Total (RT)	1,460	**12,074**	2,012	4,166
• Heavy Lift	919	**11,120**	1,309	3,390
• Light Lift	541	**964**	703	776
Truck Trips Total (RT)	2,417[1]	**4,500**	2,176	2,949
• Construction	2,268	**1,484**	1,972	**2,178**
• Disposal	159	**3,016**	204	771
Mule Trips (RT)	4,979	**6,507**	4,109	4,392

Based on these data, it is Mono County's understanding that the full decommissioning alternative would have greater potential than all other alternatives for impacts on export of demolition material, helicopter trips (heavy and light lift), truck trips (construction and disposal), mule trips, and project duration. SCE's preferred alternatives (Gem retrofit and

[1] Individual construction and disposal numbers total 2,427 (not 2,417 as shown in the TSR).

partial removal of Agnew and Rush Meadows dams) would have the shortest project duration and the fewest number of truck trips, while the partial removal alternative (all dams) would have the fewest number of helicopter trips. The retrofit and partial dam removal options would have no requirement for export of demolition materials. Mono County acknowledges and appreciates the level of detail and useful information provided by SCE in TSR DEC-1 for the dam alternatives.

The County does have a question concerning helicopter flight patterns. It appears that one route would have the helicopters fly directly over the canyon, while an alternate route appears to avoid the canyon. The flight route that avoids the canyon would be expected to have fewer noise impacts on Down Canyon residents and visitors. What operational assumptions, constraints and helicopter route requirements were used by SCE in the analysis? Reduction of project-related noise levels is a primary goal for Mono County. If feasible, the route that avoids the canyon should be identified as the preferred flight pattern.

2. CREEK FLOWS, WATER LEVELS AND SEDIMENTATION

Mono County is reviewing the hydrologic information provided in TSR DEC-1 as well as TSR AQ-2 (Hydrology), and will submit comments on all of these data as part of its comment letter on AQ-2, to be submitted no later than 25 July 2024.

3. FORMAL REQUEST FOR SCE TO REVIEW ALTERNATIVE LOCATIONS FOR PROPOSED BASE OF OPERATIONS

TSR DEC-1 §1.2 states that the project alternatives for Rush Meadows, Agnew, and Gem dams vary in their locations, objectives, specific construction activities, timing, and duration, but share certain project components. The shared components include use of the June Mountain Ski Area parking lot as a base of operations.[2]

SCE does not state or explain its reasons for excluding the Base location from the alternatives review. However, analyses provided in DEC-1 and other TSRs show that there are significant differences between the dam alternatives in terms of the type and scope of impacts that may occur. It is reasonable to anticipate that the Base alternatives would also differ widely in their potential for adverse impacts.

The June Mountain Ski Area parking lot Base location is associated with multiple potentially significant adverse impacts on the June Lake community. The potential impacts include but are not limited to (1) impaired circulation, (2) uncertainty in local planning, (3) increased noise and emissions, (4) heightened concerns for pedestrian/cyclist safety, (5) impairment of scenic resources, and (5) potentially severe economic harm.

The scope and magnitude of potential impacts is a sufficient and compelling reason for SCE to seriously examine alternative base locations. A careful review of alterative Base sites could result in identification of one or more alternative locations that would reduce or avoid significant impacts without compromising attainment of SCE objectives. This ideal outcome can be achieved only if SCE undertakes a thorough review of potential alternative Base locations. Mono County hereby requests that SCE undertake a review of alternative Base sites.

[2] Other shared project elements include establishment of the construction area, general construction activities; disposition of other Project facilities, and outreach activities.

Document Content(s)

MONO COUNTY
DEPARTMENT OF PUBLIC WORKS

POST OFFICE BOX 457 • 74 NORTH SCHOOL STREET • BRIDGEPORT, CALIFORNIA 93517
760.932.5440 • Fax 760.932.5441 • monopw@mono.ca.gov • www.monocounty.ca.gov

Paul Roten, PE
Public Works Director
PRoten@mono.ca.gov

Kalen Dodd, PE
County Engineer
KDodd@mono.ca.gov

To: Southern California Edison Company
Attention: Matthew Woodhall, Generation-Regulatory Support Services
Matthew.Woodhall@sce.com

From: Mono County Public Works

Date: July 25, 2024

Subject: Comments on AQ-2 – Hydrology Draft Technical Study
Rush Creek Project Relicensing Project, FERC P-1389

Dear Mr. Woodhall,

Mono County Public Works has reviewed AQ-2 and some of its referenced documents. Public Works has two areas of potential concern with the hydrologic studies presented thus far. The first concern is that predicted flows, which could be used to model the project's effect on nearby floodplains are possibly underestimated. The second concern is that the analysis may not be generally on a trajectory to adequately consider the project's effects on channel hydraulics in Reversed Creek and the surrounding floodplain in the vicinity of the confluence of Rush and Reversed Creeks.

1. Estimation of 100-year unimpaired flow

   The correlations in the Pre-Application Document 4.3A between the Silver Lake Gauge and the Walker River which were used to scale flows for the unimpaired scenario seem to fit well for low flows, but the data are sparse and don't fit well at high flows. A different method (perhaps second order curve?) might work better for the purpose of scaling higher flows.

   The Gotvald 2012 regression equations that were discarded for being too high might also be reconsidered for this purpose. It looks like the Walker Gauge that was used to scale the Rush Creek data was included in the development of those discarded equations. The error between that gauge data, and the regression equations could be looked at, and if low, maybe Gotvald's Lahontan region regression equations might be deemed useful after all.

   Public Works is also curious if the equations for the nearby Sierra Nevada region from Gotvald 2012 were looked at, especially compared to any data obtained from higher in the watershed nearer the divide and above storage, and what 100-yr flow those equations might predict.

2. Modeling project effect on Floodplain

   Rush Creek combines with Reversed Creek downstream of the proposed project. Reversed Creek is surrounded by an approximate A zone floodplain, and residential development in and around that floodplain. The area surrounding the confluence is relatively flat wetland. Flow is likely subcritical here, thus potential for any increased flow from Rush Creek to create a backwatering effect in Reversed Creek and the other minor unnamed creeks exists. Reversed Creek in the vicinity of the confluence should be included as a Project-affected stream reach and analyzed along with the other reaches.

   Other than mention of a temporary gauge, and possibly some adjustment for mass-balance, consideration of the contribution of flow from Reversed Creek seems to be absent in AQ-2. For example, Table AQ 2-10 shows that the 1% annual exceedance of Rush Creek above SR158 is determined to be 1,328cfs, and the same above Silver Lake to be 1,524 cfs, implying that the contribution of Reversed Creek during the same such event would be 196 cfs. In contrast, A 1993 Army Corps floodplain study of Reversed Creek uses a 100-yr flow of 1,700 cfs in the Reversed Creek channel at the same vicinity. Subsequently developed regression equations (1994 USGS, and 2007 Caltrans) also predict higher flows in Reversed Creek during the 100-year event. The Reversed creek and Rush creek watersheds are close enough that both could reasonably be expected to experience high flow events simultaneously.

   Mention is made to backwater effects being considered in AQ-1 – instream flow technical study plan as a future component. Public Works is unclear as to what the scope of that additional study will be. If the intent is for the flows determined in AQ-2 to be used in this future effort, Public Works thinks more conservative estimates of the flow contribution of Reversed Creek, especially during flood events should be made.

   Public Works is not aware of any accurate hydraulics models of the area surrounding the confluence of the creeks that could be used to demonstrate the effects the project could have on the floodplain. Public Works recommends that a HEC-RAS model per applicable FEMA guidance for preparation of a flood insurance study be constructed which simultaneously considers all of the watersheds feeding the confluence.

In summary, it is unclear to the County whether the Rush Creek Project would contribute to additional flood hazards or alter existing floodplain. However, Public Works believes that the possibility is likely enough to warrant preparation of a high-quality simulation and analysis of hydraulics around the confluence of Rush Creek and Reversed Creek.

If results of such a modeling effort show the potential for the project to impact nearby homes and streets, the model would also be instrumental for SCE to design stream channel enhancements or other possible mitigations. Thank you for the opportunity to review and provide comments on these items, and for your consideration. Correspondence regarding this letter should be directed to Kalen Dodd, Mono County Engineer, at kdodd@mono.ca.gov

Best Regards,

Paul Roten, P.E., Director of Public Works

Document Content(s)

Mono County

Community Development Department

PPO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
www.monocounty.ca.gov

7 June 2024

Southern California Edison Company
Attention: Matthew Woodhall, Generation-Regulatory Support Services
2244 Walnut Grove Avenue
Rosemead, CA 91770
Matthew.Woodhall@sce.com

Stantec
295 Highway 50, Suite 1
Zephyr Cove, NV 89449-7702
Patricia.Sussman@stantec.com
Julie.Smith@stantec.com

Federal Energy Regulatory Commission (FERC)
Docket (P-1389)
Quinn.Emmerin@ferc.gov

Sent via email, US Postal Mail, and filed online at FERC.gov

SUBJECT: **Comments on Technical Study Report (TSR) LAND-2 Noise**
Rush Creek Project Relicensing Project, FERC P-1389

Dear Mr. Woodhall:

The Mono County Community Development Department (CDD) appreciates the opportunity to submit comments on SCE's Rush Creek Project Technical Study Report (TSR) LAND-2: Noise. Our project understanding at this time is based on information provided on the SCE and Federal Energy Regulatory Commission (FERC) eLibrary project websites, TSR LAND-2 (Noise), and other technical study reports provided by SCE; information gained at the 30 April 2024 and 4 June 2024 meetings; and additional information obtained through direct telephone communication with Mr. Woodhall on 23 May 2024. Based on these sources, we have developed a number of comments concerning TSR LAND-2 (Noise) and the larger project proposal, as presented in this letter. County comments on TSR AQ-2 (Hydrology) will be submitted separately before the review period closes (on 25 July 2024) for that report.

Please do not hesitate to contact me if you have questions about any of the comments or information provided in this comment letter. I can be reached via telephone (760.924.1814) or email (wsugimura@mono.ca.gov).

Sincerely,

Wendy Sugimura

Wendy Sugimura
Mono County Community Development Director

CC: Mono County Board of Supervisors
Mono County CAO Sandra Moberly

I. SUMMARY OF SPECIFIC REQUESTS

- Convert all 16 Points of Interest (POIs) into measurements for all types of noise and add three POI locations as specified in the comments.
- If the POI's are not converted to assess all noise types, add two new POIs to assess truck traffic noise in Down Canyon and June Lake Village.
- Evaluate other alternatives for the Base of Operations site; the County specifies three sites in our comments.
- Use the Mono County Noise Ordinance to establish impact significance thresholds.
- Contact the Solid Waste Superintendent to discuss waste disposal.
- The noise analysis should include: a cumulative impact of all noise sources operating at the same time, effects of the geomorphology of the canyon on noise attenuation and dispersal, and a full evaluation of the difference in noise generation and impacts for all alternatives.
- Answer the list of questions in the County's comments and clarify cargo transport, construction season, no project alternative, and project timeline.
- Provide a flowchart of the stakeholder/agency Mitigation and Settlement Agreement process.

II. BRIEF PROJECT OVERVIEW[1]

INTRODUCTION: SCE is seeking approvals from FERC to modify its facilities at Rush Meadows Dam, Agnew Dam, and Gem Dam/Rush Creek Powerhouse (the Project). The project proposals include:

For Rush Meadows and Agnew Dams: SCE has identified two relicensing alternatives for review:

- Full dam removal, with a construction period (June 1 through October 31) of two seasons
- Partial dam removal, with a construction period of one season

Under each relicensing alternative, hydroelectric operations at Rush Meadows and Agnew dams will be discontinued, and the facilities will be removed from the FERC license once all license conditions and regulatory requirements of FERC and other resource agencies are met.

For Gem Dam and Rush Creek Powerhouse: One alternative is proposed:

- Retrofitting the dam to meet seismic restrictions under a probable maximum flood (PMF) event with a new spillway and reduced dam height. The Gem Dam and Rush Creek Powerhouse project has a construction period of three seasons.

Under this alternative, hydroelectric operations at Gem Dam and Rush Creek Powerhouse will continue under FERC jurisdiction consistent with conditions identified in a new FERC license.

PROJECT PURPOSE: The Rush Creek Project includes three dams and three associated reservoirs (Agnew Dam/Agnew Lake, Gem Dam/Gem Lake, and Rush Meadows Dam/Waugh Lake). The project also includes a water conveyance system, the Rush Creek Powerhouse, and ancillary facilities. The reservoirs have provided storage for lake recreation during summer and electricity generation at the Rush Creek Powerhouse in the fall/winter. Energy from the SCE Rush Creek system has provided back-up power to the June Lake community when the Public Utilities District facilities are offline.

After the Silver Lake earthquake fault was identified as a potential safety concern in 2007, SCE conducted fault studies, structural testing, and engineering analyses of the three dams. Beginning in 2012 and based on results of the analyses and consultation with FERC and the California Division of Safety of Dams (DSOD). SCE implemented storage restrictions at

[1] This section briefly summarizes the SCE project proposal. The County asks that SCE provide corrections and clarifications as needed to ensure a common understanding of project elements, goals, and process.

the three reservoirs and structural modifications at Agnew and Rush Meadows dams (2017-2018) and Gem Dam (2020-2021). Agnew Dam is rated as in "poor condition" in the March 2019 Mono County/Town of Mammoth Lakes *Multi-Jurisdictional Hazard Mitigation Plan* (MJHMP).

TIMELINE: SCE submitted the required Notice of Intent (NOI) and Pre-Application Document (PAD) to FERC in January 2022, and the overall project goal is to complete all required relicensing steps before the current license expires in 2027. Permitting, decommissioning and construction would begin thereafter, extending over a 12-year period through 2038.

TECHNICAL STUDY REPORTS: SCE has prepared fourteen Technical Study Reports (TSRs) for the project. The TSRs have been distributed for 90-day review periods beginning on the dates shown below:

REPORT	DATE		REPORT	DATE
AQ-1: Instream Flow	24 April 2024		LAND-1: Aesthetics	1 April 2024
AQ-2: Hydrology (including flooding)	26 April 2024		LAND-2: Noise	11 March 2024
AQ-3: Water Temperature	26 March 2024		TERR-1: Botanical	29 March 2024
AQ-4: Water Quality	4 March 2024		TERR-2: Wildlife	29 February 2024
AQ-5: Geomorphology	9 April 2024		REC-1: Recreation	29 Feb 2024
AQ-6: Fish Population & Barriers	29 Feb 2024		EJ-1: Environmental Justice	11 March 2024
AQ-7: Special Status Amphibians	29 Feb 2024		DEC-1: Full Decommissioning	5 April 2024

Three additional TSRs are currently in preparation: TRI-1 (Tribal), CUL-1 (Built Environment) and CUL-2 (Archaeology). SCE also completed a Socioeconomics assessment that was incorporated into the Preliminary Application Document (PAD) and is currently under review by FERC. The Socioeconomics assessment will be a stand-alone chapter in the Environmental Effects section of the Draft License Application (DLA), and is not currently available for public review.[2]

PROJECT PERMITS: SCE has preliminarily identified thirteen permits that will be required during the course of the project, including one permit from Mono County for use of County roads.

BASE OF OPERATIONS: SCE has identified certain proposed activities as common to all relicensing alternatives, including the establishment of June Mountain Ski Area (JMSA) parking lot as the Base of Operations. Other common elements include the areas of construction, construction activities, disposition of other project facilities, and the outreach process. The Base of Operations will be established at the beginning of each construction season and restored to allow winter ski operations at the end of each construction season.

DEBRIS DISPOSAL: The 2022 Preliminary Application indicates that non-hazardous construction debris will be transported daily/weekly from JMSA Base of Operations to the Benton Crossing Landfill or another approved disposal site. Hazardous debris will be hauled by truck to an approved hazardous waste disposal site (Ridgecrest, California; Los Angeles, California; or Beatty, Nevada). Caltrans and Mono County authorizations will be obtained for road use.

III. COMMENTS ON TSR LAND-2 (NOISE)

TSR §2-STUDY OBJECTIVES & MONO COUNTY NOISE ORDINANCE. Section 2 of TSR LAND-2 that states the SCE objective to '*characterize ambient and Project-generated noise at sensitive receptor areas (i.e., residences, businesses, and recreation areas) and compare these to applicable state and local noise regulations/ordinances,*' with a footnote clarifying

[2] Patricia Sussman, Stantec Senior Environmental Manager, email communication, 21 May 2024.

that the analysis of potential noise impacts will be included in the license application. SCE's Draft Overview Schedule indicates that the Licensing Process will begin early in 2025 and continue through 2026.

Construction on the Rush Creek Project will extend over a four-month period during summer (from June 1 through October 1) throughout the construction process. The construction timeframe is generally described as noted above in §II Introduction and Project Purpose, but the cumulative years of project work is not specified.

The Mono County General Plan notes that summer uses, primarily associated with fishing, currently generate a majority of the community's income. SCE has stated that it will work closely with Mono County through the Mediation and Settlement process to identify alternatives and mitigation measures that will achieve Noise Ordinance standards as closely as is feasible, and to minimize the environmental and economic impacts of this project on the June Lake community. The County intends to work closely with SCE on this consequential effort.

TSR §3.1 to §5.0-STUDY ELEMENTS COMPLETED, NOISE SENSITIVE RECEPTOR POIs, STUDY APPROACH. The Mono County CDD has identified noise and hydrology as primary project concerns. Past SCE helicopter operations at June Mountain in 2017 and since have generated significant noise complaints from local citizens and visitors. These past complaints of helicopter noise when based at June Mountain should be recognized in the report. Based on this history, and project information currently available, the proposed Rush Creek Project has potential for widespread and significant adverse noise impacts on the June Lake community over an extended timeframe. The Mono County CDD is particularly concerned about potential impacts to residential and commercial areas.

TSR LAND-2 Sections 3.1 through 5.0 describe the process used to identify and refine sensitive noise receptors, noting that the number of POIs was expanded over time in response to stakeholder concerns. All of the existing POIs are in the SCE-defined 'noise assessment study area' that includes the Rush Creek Powerhouse area, the JMSA Parking Lot area, helicopter flight paths between JMSA Parking Lot and the project construction areas, construction activities at the potential enhancement area in lower Rush Creek channel, and truck haul routes on SR-158.

In conversations with Mono County staff following the 30 April 2024 June Lake Community presentation, recommendations for additional POIs were solicited. None of the current POI noise measurement locations encompass the community areas around and between Gull and June Lakes. To ensure that these areas are part of the analysis, the County requests that SCE obtain supplemental noise measurements at three additional POI locations. As shown in the POI Location Map, the locations include:

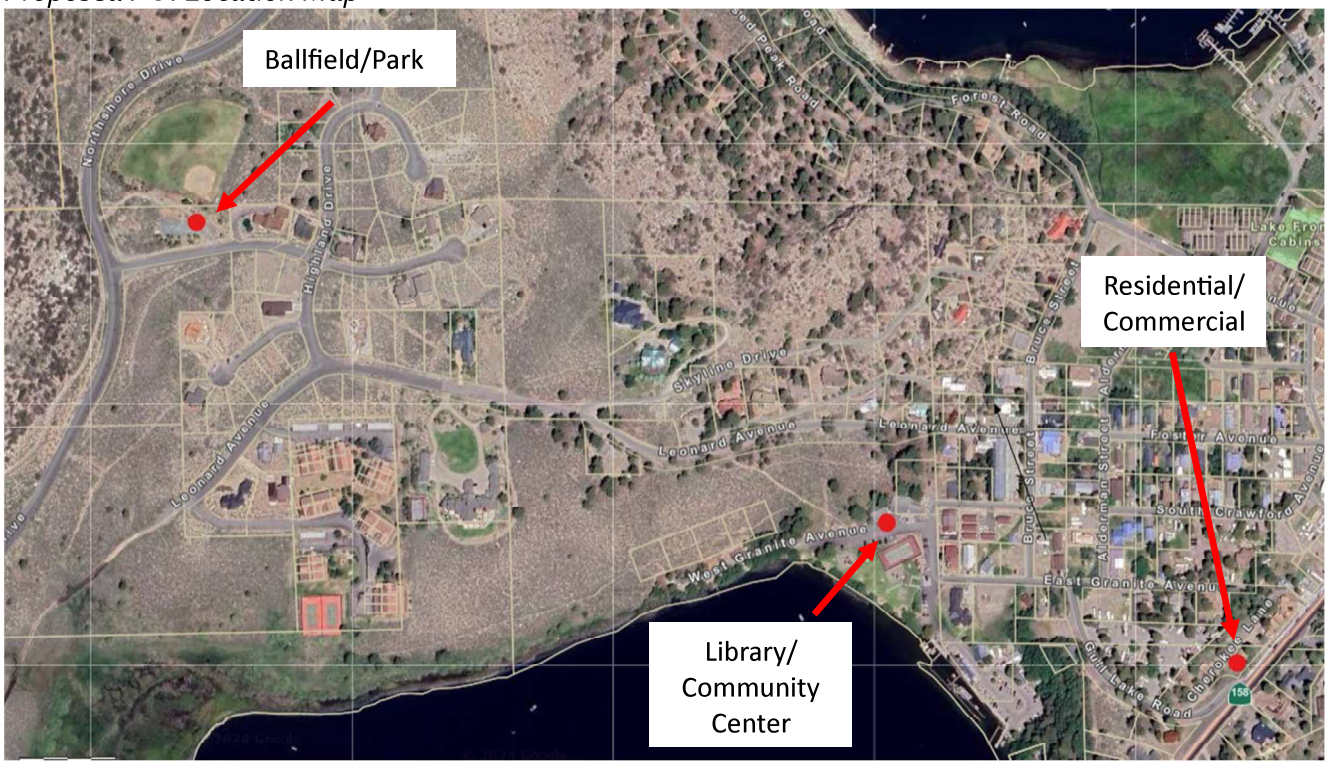
(a) Memorial Ballfield/Ballpark located just north of the intersection of North Lake Drive & Mountain Vista Drive,
(b) June Lake Library/Community Center located just north of the junction of E. Granite Drive & W. Granite Drive,
(c) Residential/Commercial area located between SR 158 and Cherokee Lane.

These sites should be used to assess noise from helicopter flights, trucks and construction. All three of the proposed community POI locations are representative of facilities and locations commonly used by the June Lake Community, and thus useful in gauging the impacts of project-related noise on community life. The recommended POIs are also consistent with Caltrans' and FAA's shared definitions of noise sensitive areas (i.e., residences, schools/libraries/ educational, churches/religious, and hospitals/health) as cited in TSR LAND-2 §5.1.1.

With regard to helicopter and truck noise, the Noise TSR identifies 16 single source POIs, with most committed to assessing powerhouse noise, and only two assigned to helicopter noise. Also, although truck traffic originates at June Mountain, the POIs for trucks are situated outside the community at Silver Lake and Grant Lake recreation areas, rather than in the community. Either all POIs should be used to assess all noise sources, or additional POIs should be added to

monitor truck noise Down Canyon and in June Lake Village, and helicopter flight noise in similar locations. Also, as noted above, the three recommended POIs for the community core should assess multiple noise sources.

Proposed POI Location Map



Finally, the analysis should address the cumulative impact of all noise sources. What are the community noise impacts when helicopters, trucks, construction activity and the powerhouse operate at the same time?

TSR §5.1.3 ANALYSIS METRICS AND FREQUENCY WEIGHTING. TSR LAND-2 Section 5.1.3 identifies factors that determine the efficiency of sound transmission and affect potential noise impacts at offsite locations. Factors identified as important include "*distance from the source, frequency of the sound, absorbency and roughness of the intervening ground (or water) surface, the presence or absence of obstructions such as buildings and their absorbency or reflectivity, and the duration of the sound.*" The list does not directly identify topography and landform as key issues, but Mono County CDD anticipates that the natural amphitheater formed by June Mountain, San Joaquin Mountain, Carson Peak, and Parker Peak and the centrally located Reversed Peak, may also have a significant effect on sound transmission in the June Lake loop, including echoes and noise reverberation. Please assess how the volume, area of impact and duration of project-related noise impacts may be shaped by the mountainous geomorphology of this setting.

TSR §5.1.4 NOISE THRESHOLDS. SCE states in Section 5.1.4 that it is currently in consultation with Mono County to identify the most appropriate noise thresholds for assessing project construction activities, and that results of the discussions will be provided to stakeholders during the TSR review period. Staff is unaware of any active, direct discussion on appropriate noise thresholds at this time.

The Mono County Noise Ordinance (County Code Chapter 10.16 – Noise Regulation; https://library.municode.com/ca/mono_county/codes/code_of_ordinances) should be used by SCE as the noise thresholds for assessing project construction activities. This ordinance implements the policies of the Mono County General Plan Noise Element and its

goal to preserve the county's quiet, rural atmosphere by maintaining existing ambient noise levels and preventing incompatible land uses from encroaching upon existing and planned land uses.

TSR §5.2 SPECIFIC STUDY COMPONENTS. This section details the approach used by SCE for each study component associated with powerhouse operation, helicopter use, construction equipment operation, and truck hauling analysis. Mono County CDD requests that the discussion in this section be amended to include the larger June Lake community areas and POIs referenced above in the discussion for TSR Sections 3.1 to 5.0, as well as the additional analysis metrics referenced above in the discussion of TSR Section 5.1.3.

TSR §5.2.2 HELICOPTER USE. Discussion in TSR §5.2.2 identifies the June Mountain Ski Area Parking Lot/Base of Operations as the '*transportation hub for moving equipment and materials to and from each construction site by helicopter*' and further states that '*construction debris will be transported from the construction areas to the base of operations for stockpiling prior to transport to an approved disposal site.*'

Based on long experience, the County anticipates that helicopter noise may be perceived by the June Lake community as an especially impactful element during project construction, and likely to exceed noise ordinance thresholds. This disruption merits SCE consideration of an expanded review of project alternatives to determine whether substantive impact reductions can be achieved without jeopardizing project feasibility. Alternatives for the Base of Operation are especially important in this assessment, along with other modifications that could minimize project impacts. As an example, identification of a debris deposition site closer to the Pumice Valley landfill would potentially reduce noise levels in the central area and reduce trucking distance between the deposition site and the landfill, while maintaining JMSA as a Base of Operations for other activities. A more detailed discussion of alternatives is provided later in this comment letter (please see §IV, Alternatives). Mono County CDD looks forward to assisting SCE in this effort.

As an additional minor question, the introductory discussion in the section states that '*there are two average flight paths traveling approximately east to west, identified as the "northern flight track" and "southern flight track*." What does the word '*average*' mean in this sentence?

TSR §5.2.2.2 CHARACTERIZE AMBIENT AND PROJECT-INDUCED NOISE GENERATION. Section 5.2.2.2 indicates that the TSR LAND-2 noise study used the Department of Defense Noise map suite of computer programs for aircraft noise modeling and analysis, including the Advanced Acoustic Model (AAM) which accounts for varying terrain and ground impedance in assessing noise propagation. The discussion states that altitude, airspeed, and angles of attack and roll were included in the profiles along with engine power and rotor blade pitch. In addition to these variables, and as noted above in the comments on TSR §5.1.3, Mono County CDD anticipates that the configuration of peaks in the June Lake study area may also substantively impact the community experience of project-related noise, and requests that these factors also be taken into account by SCE.

TSR §5.2.3.2 CHARACTERIZE AMBIENT AND PROJECT-INDUCED NOISE GENERATION. This section states that impact equipment such as pile drivers will not be used in project construction; the confirmation is welcomed.

TSR §5.2.4 TRUCK USE AND DEBRIS DISPOSAL. This section states that non-hazardous debris will be hauled by transport vehicles to Benton Crossing via the northern route of the SR-158 loop road**.** County staff have informed SCE that the Benton Crossing Landfill closed at the end of 2023; the Pumice Valley Landfill and Transfer Station now serves as the County landfill. Located approximately 5 miles east of US 395 on Highway 120 East, the Pumice Valley Landfill is overseen by Mono County Solid Waste Division. Capacity at Pumice Valley may be constrained during the timeframe of the Rush Creek Project. The County encourages SCE to timely contact Mono County Public Works Solid Waste Division for further discussion of debris disposal requirements.

TSR §6.2 SPECIFIC STUDY COMPONENTS. Section 6.2 indicates that the analysis and comparison of noise levels associated with the full- and partial- decommissioning project alternatives will be evaluated within the license application. The discussion acknowledges that these alternatives vary in terms of construction duration and the number and frequency of helicopter flights and truck haul trips. The Mono County CDD believes that it may be useful to provide this analysis as part of the current TSR review process.

Data provided by SCE indicates the partial decommissioning alternative would require 2,154 fewer helicopter trips (a 51.7% reduction) and 773 fewer truck trips (a 26.2% reduction) overall than the full decommissioning alternative. On the surface these are compelling reductions, but their significance will be made clearer when paired with a comparison of noise reductions. Mono County CDD encourages SCE to complete the comparative analyses of these alternatives (including noise and other impacts) as soon as possible. This information will facilitate development of project options and alternatives that have potential to avoid or lessen significant impacts on the June Lake community.

IV. ALTERNATIVES

The Mono County CDD recognizes the public safety mandate underlying the proposed Rush Creek Licensing Project. At the same time, SCE has documented that the intensity of project-related impacts (particularly helicopter and truck activities) may correlate strongly with the decommissioning alternative selected (partial v. full decommissioning). SCE has not yet set forth alternatives for other project elements, but the Board of Supervisors anticipates that a wider review of project alternatives – particularly with respect to siting of the Base of Operations ("Base") -- could yield additional substantive impact reductions.

During a recent communication,[3] SCE stated that it has reviewed a number of alternative locations for the Base. Primary siting factors mentioned by SCE for the alternative locations include distance to the work area, highway crossings, power lines, tree heights, access roads, adequate space for support activities, refueling, and wildlife (e.g., nesting activities) and other environmental constraints. Listed below are alternative sites considered by SCE per the recent communication:

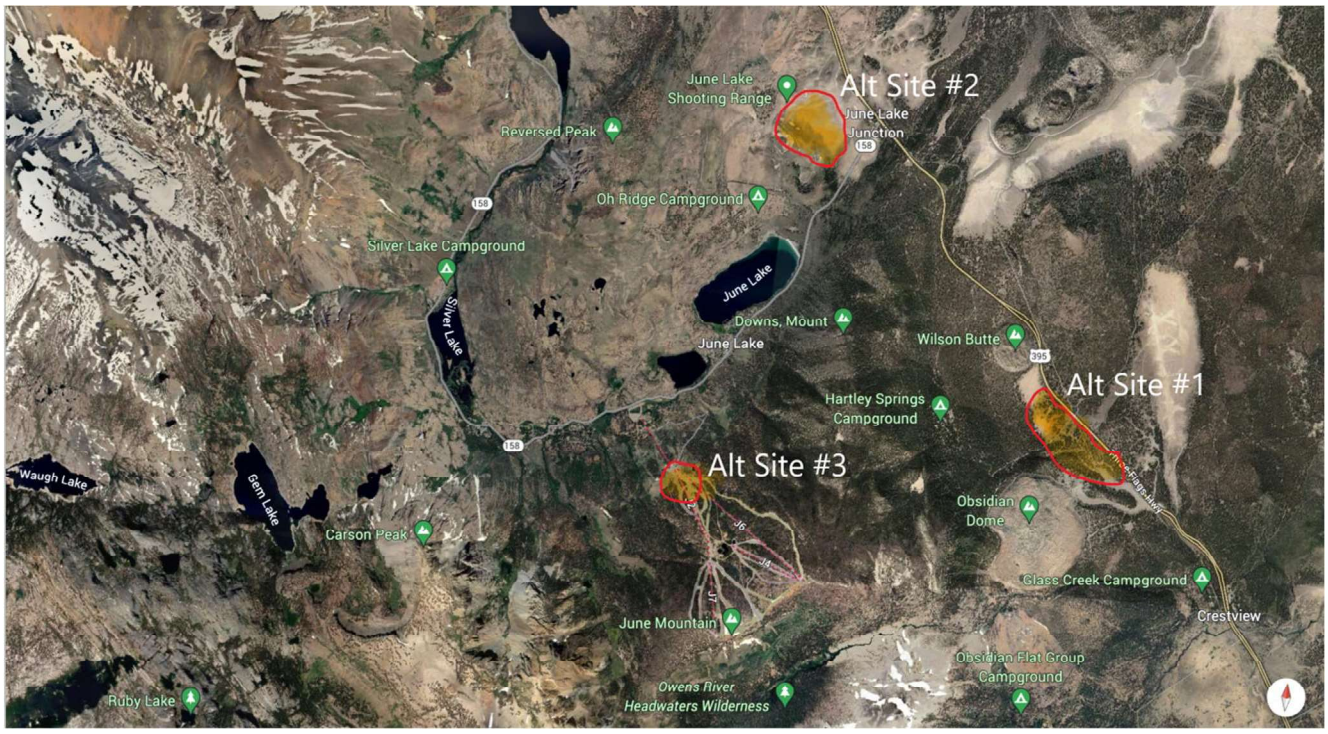
- The **Industrial site on US 395 by Oh Ridge**. Although considered by SCE to be a good site overall, this location was not favored due to the presence of power lines and the requirement for road closures as helicopters to pass over SR 158.
- **Hartley Springs area near Glass Creek:** The Hartley site was found to have relative proximity and good access to US 395, but this location was not favored due to the height of trees in the area, impacts to the campground and the longer helicopter trip lengths.
- **June Mountain mid-mountain base area.** SCE also considered the mid-mountain base area of June Mountain, but this location was not favored due to the difficulty of equipment access.
- The **USFS Crestview area off US 395**. This site was found to have adequate open space clearance, but was not favored by SCE due to distance from the work area, road closures and other obstacles.
- **Grant Lake.** SCE considered a site near Grant Lake, but the site was not favored due to the requirement for road closures and the present of power lines.
- **Rush Creek Powerhouse.** This location was found to meet many SCE criteria. Though too small for the Skycrane, SCE considered it potentially suitable for the smaller helicopters .

[3] Telephone conversation on 21 May 2024, Matthew Woodhall (SCE), Scott Burns (Mono County), Sandra Bauer (Mono County).

In addition, the United States Forest Service has proposed that June Lake Fire Department Station #2 be considered as an alternative Base site, which would require the clearing of trees. Because Station #2 is located in the heart of Down Canyon, this site may be as impactful as the proposed location.

The Mono County CDD requests that SCE give more thorough review to three of the alternative sites previously considered but not favored after the initial review (see map below): 1) the Hartley Springs area, 2) the industrial site north of Oh Ridge and south of US 395, and 3) the mid-mountain base of operations at June Mountain. Each of these sites appears to be within three miles of the work area, and each has been previously disturbed by historic uses. Most importantly, each of these sites has potential to route helicopter flight paths away from Down Canyon and thereby reduce noise impacts on the June Loop communities (compared to the proposed June Mountain Ski Area Base of Operations).

Map of Alternate Locations for Base of Operations



SCE cites road closure and trees as two reasons for disfavoring some alternatives. Sustained helicopter noise potentially has a more significant impact on the community than road closures. The Mono County CDD requests that SCE not prioritize avoidance of road closures over noise impacts without clearly describing the underlying basis and analyzing the impacts of both measures. As far as trees, the USFS proposed alternative, similar to Hartley Springs, also has significant tree coverage that would require some type of site preparation, including and up to removal of trees. If tree removal is considered acceptable at the USFS site, the Hartley Springs site should receive the same consideration to enhance its viability.

Factors Used to Identify Suitable Locations for the Base of Operations: The County is sincere in its offer to assist SCE in the review of potential alternatives for the Base of Operations. To facilitate our understanding of technical requirements, please provide responses and information for the following questions:

1. Is there a specified flying elevation that would allow roads to remain open during helicopter overflights?
2. What are the specific code standards and regulations that require closure of roads close when helicopters fly over?

3. What factors govern the management of road closures including (a) planning to ensure coordinated timing of the helicopter overflight with traffic controls; (b) duration of the road closure; (c) use of staff (e.g., flag-holders and pilot cars) versus use of signal controls; (d) advance public notification of areas subject to closure?
4. Is there a maximum elevation over helicopters cannot fly depending on the weight of cargo load?
5. Is there a certain terrain over which they cannot fly depending on load?
6. What are the staging area requirements (minimum square footage and clear space dimensions) for helicopter landings and cargo loading onto trucks? What is the minimum required separation from the landing area to power lines? To trees of various heights?
7. What are the constraints on selecting the flight patterns and routes?
8. What factors might enable the helicopters to fly behind or over the mountains instead of flying through the Canyon?
9. What are the Base access road requirements? For example, does the access road require two 12' travel lanes? Must it be rated for a certain level of travel? Is paving required, or can it be unpaved ? Does the access road need to have a certain weight-bearing capacity?

Cargo Transport Alternatives: What is status of the existing tram system for the Rush Creek Project? Are there project activities that could be shifted from the helicopters to the tram system, or an upgraded tram system? What is the role of pack horses and mules, particularly given the wilderness status of much of the project area? Can additional project activities be accommodated by packers?

Construction Season Alternatives: Mono County CDD understands that helicopters may perform more efficiently in colder temperatures. Would helicopter use in the shoulder seasons potentially be more efficient, and necessitate fewer trips, than during the prime summer tourist months?

No Project Alternative: SCE has made comments suggesting that they have an option to withdraw the project or withdraw from the project in some manner. Given the compelling public safety objectives associated with the Rush Creek Project, simply walking away and leaving the dam in a state of potential imminent failure does not seem like a viable option. Please describe the public safety measures that would be taken to secure to dam in the event of a "No Project" alternative.

V. PROJECT DURATION

The Pre-Application Document describes the construction process as follows:

(A)	Agnew Dam:	Full dam removal -- two construction seasons Partial dam removal – one construction season
(B)	Rush Meadows Dam:	Full dam removal -- two construction seasons Partial dam removal – one construction season
(C)	Gem Dam:	Retrofitting to occur over three construction seasons

The USFS, in its comments on TSR DEC-1 (Decommissioning), included the following statement: *"1.4.3.3 The report should clarify that the construction timelines do not run concurrently, and that the activities are done sequentially."* Mono County CDD requests that SCE provide a clear and unambiguous construction timeline that shows potential best-case and worst-case beginning and end dates for the construction process, with cumulative years of construction for each scenario. The total time of community noise exposure is an important factor in determining significance of impact.

VI. PROJECT PROCESS

In addition to the specific project-related topics summarized above, Mono County CDD has a number of questions concerning the process for agency engagement. SCE has stated that Rush Creek project is not subject to local agency regulatory standards or to the mitigation commitments and requirements that would normally apply through CEQA and NEPA. At the same time, SCE has affirmed its intent to work with Mono County and other stakeholders to mitigate adverse project impacts to the maximum feasible extent. SCE has also indicated that specific concerns will be addressed through a formal Mediation and Settlement Agreement, if requested by the agency or stakeholder.

Based on a cursory review of the 2007 SCE Settlement Agreement for the Big Creek Alternative Licensing Process Hydroelectric Projects, it appears to the Mono County CDD that key elements of the process include meetings with stakeholders, preparation of and comments on required technical reports, and identification of potential impacts that may serve as the basis for a settlement agreement. The agreements do not become part of the new licenses issued by FERC, but are provided to FERC for consideration in FERC's review of cumulative impacts associated with the issuance of new licenses.

Mono County's participation in the Rush Creek Project is guided by the responsibility to ensure that project impacts on the June Lake community are held to the absolute minimum while supporting the important public safety objectives of the project. To this end, the Mono County CDD requests that SCE provide a flow chart or written outline of the overall agency/stakeholder Settlement Agreement process.

From: Karyn Spears
To: Matthew Woodhall; Sussman, Patricia; Smith, Julie
Subject: Rush Creek Decommissioning
Date: Monday, June 24, 2024 9:26:20 AM
Attachments: image001.png

Good morning All,

My name is Karyn Spears, the Assistant Public Works Director. I will be the POC for the Rush Creek Decommissioning project. Would you be able to provide debris disposal details planned for this project such as what the estimated amount of non-hazardous construction debris that will be generated? Plan and location for disposal?

Thank you

Karyn Spears | Assistant Public Works Director
Public Works
kspears@mono.ca.gov
760-616-4651 (cell)
760-932-5443 (office)

Bob Marks, June Lake, CA.
I wish to comment on SCEâ€™s LAND 2â€”NOISE Technical Study Report (March 2024) and the following in-person meeting held in June Lake on April 30, 2024.

In its September 2022 Technical Study Plan, SCE identified three kinds of noise it would investigateâ€”from its powerhouse operations, helicopter use, and construction equipment. In each case, SCE said it would â€œcompare noise levels to applicable state and county regulations/ordinances.â€ Its list of references includes Mono County Noise Regulation Mono County Code Chapter 10.16.

SCEâ€™s LAND 2â€”NOISE Technical Study Report (March 2024) fails to do that comparison. FERC should require SCE to do what it said in its March 2022 TSP it would doâ€”compare its projected and modeled noise levels to the applicable ordinance, in this case the Mono County Noise Regulation. At the April 30, 2024 meeting, Matt Woodhall addressed that question by saying that the Mono County Noise ordinance did not apply to helicopter use. That is both silly and insulting. Its proposed Base of Operations is in the June Mountain parking lot, which is most assuredly in Mono County, as are the two projected helicopter flight paths. And those of us who live nearby in Peterson tract will be most affected by noise coming from SCE (or contractors) helicopters. Weâ€™ve been subjected to helicopter noise coming from SCE construction/repair activities on its dams in the past, and it is unpleasant, nerve racking, and bad for our mental and physical healthâ€”all of which can, and will, be documented if needed.

Thank you.

Bob Marks
660 Piute Ave.
June Lake, CA. 93529

Document Content(s)

131219.txt.....1

David S. Rosky
P.O. Box 494
June Lake, CA 93529
dave.rosky@gmail.com

10 June 2024

Southern California Edison Company
Attention: Matthew Woodhall
2244 Walnut Grove Avenue
Rosemead, CA 91770

Stantec
Attention: Patricia Sussman, Patrick Kester, Ed Bianchi
295 Highway 50, Suite 1
Zephyr Cove, NV 89449-7702

Regarding: FERC Docket P-1389-059, Rush Creek Project Relicensing
Attention: Quinn Emmering

Comments on Technical Study Report (TSR) LAND-2 Noise

Dear Mr. Woodhall, Mr. Emmering,

I appreciate the opportunity to submit the following comments on the LAND-2 noise study for the relicensing of the Rush Creek Project.

These comments are regarding the portion of the study in which measurements were made of operational noise from the Rush Creek powerhouse from several points of interest under several conditions of operation.

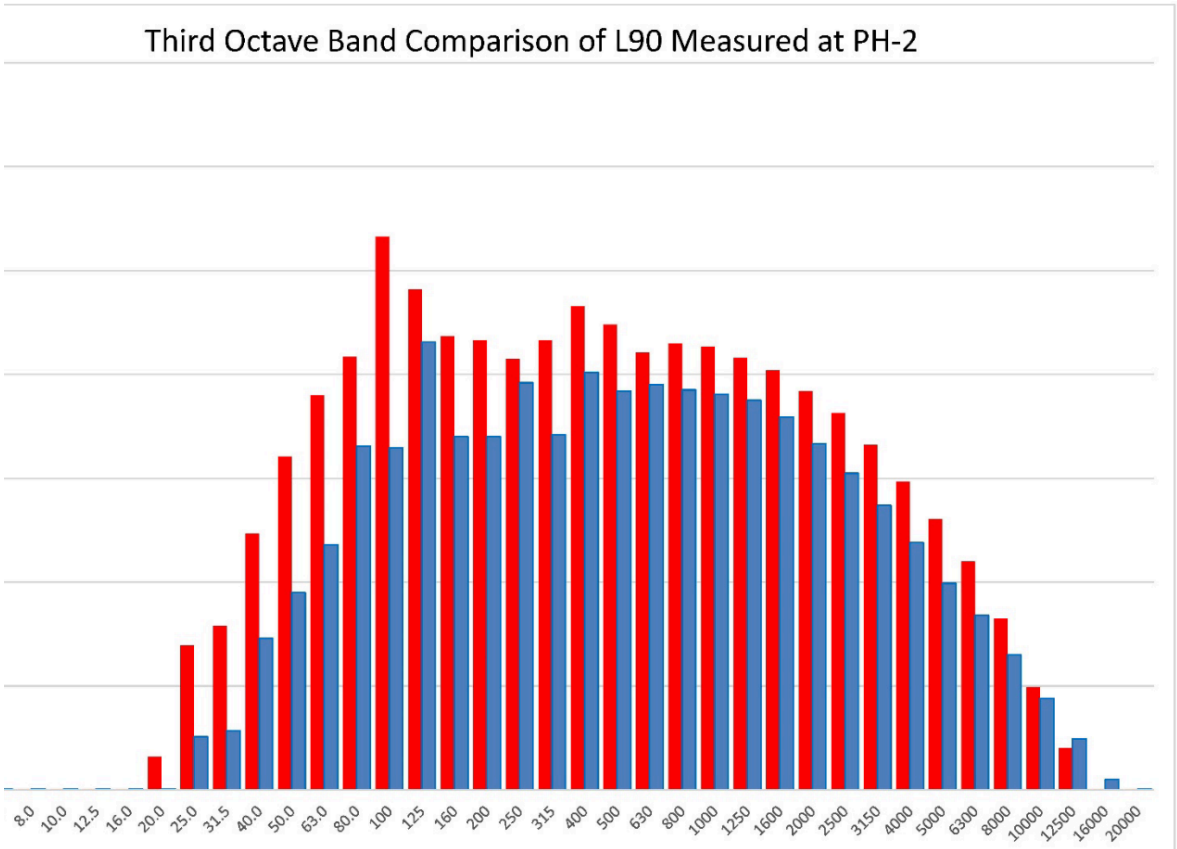
These comments are to bring forth concerns over two aspects of the noise issue with respect to the powerhouse: the spectral resolution of the noise measurements as presented in the study report, and the interpretation of the impact of the noise from a psychoacoustic aspect.

Spectral resolution of the measurements

The spectral resolution of the powerhouse noise measurements, at least as presented in the study report, are inadequate to discern the type of noise which is the cause of greatest concern in the vicinity of the powerhouse.

The study report presented noise measurement result graphs with a spectral resolution of one-third of an octave. This resolution is inadequate to fully discern and characterize narrow-band tonal noise, a type of noise which human perception is extremely sensitive to. From a psychoacoustic perspective, a tonal noise that is well below the noise floor can be easily perceived, and if it is audible and present for long periods of time, can have significant negative psychological impacts. The presence of audible narrow-band tonal noise can be considerably more important than the magnitude of such noise relative to other non-tonal noise, such as white or pink noise, that may be present.

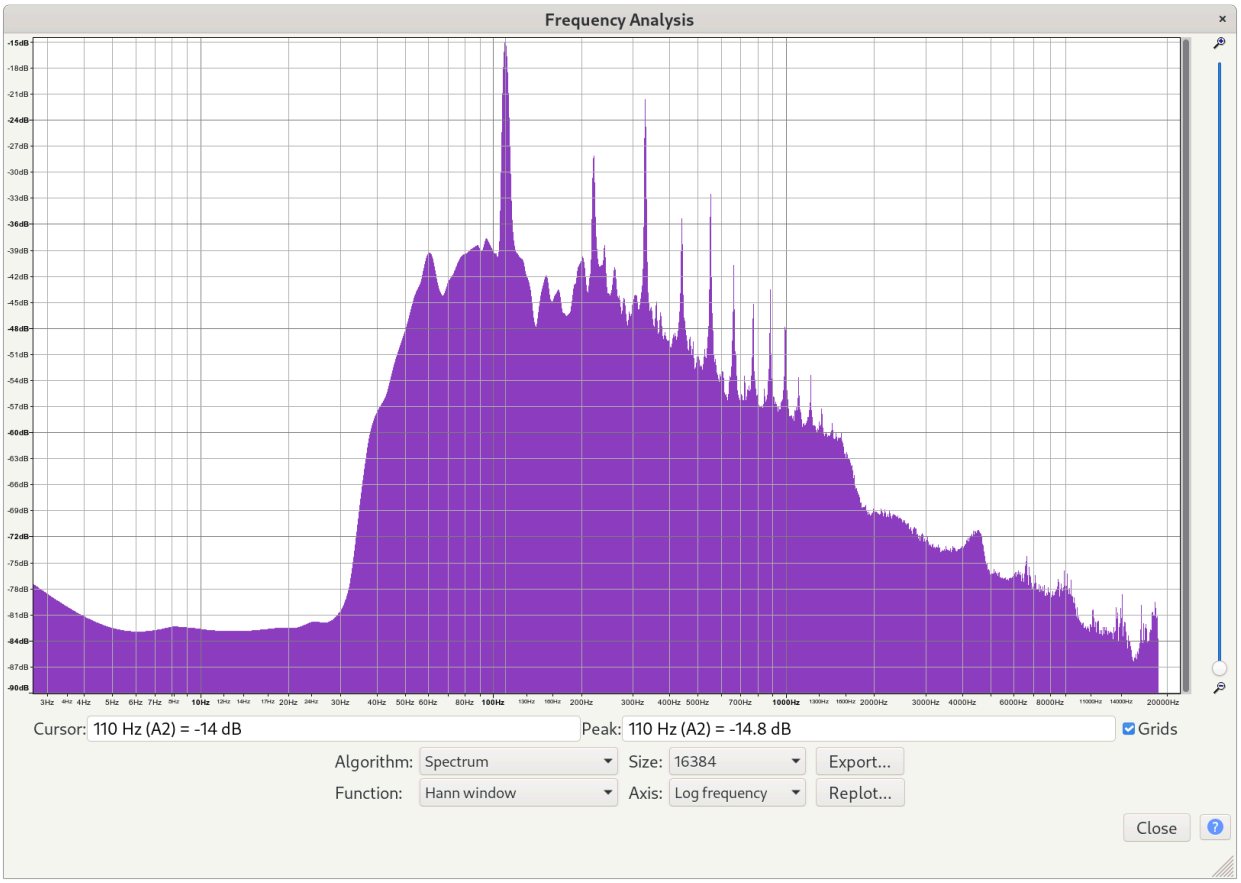
During certain operational conditions, highly audible tonal noise is emitted from the tailrace exit of the powerhouse, particularly when power is being generated at lower flows. The presence of this was captured to some degree in the study measurements, but not to a degree necessary to characterize its possible impacts. Below is a graph included in the study report:



In the graph above, an indistinct noise peak can be seen in the range of 100Hz.

Due to the limited spectral resolution in the above graph, it is impossible to discern that this is clearly a tonal noise.

Below is a chart based on recordings that I made at a previous time from a location on Highway 158 close to the powerhouse tailrace:



This chart, presented at much higher spectral resolution shows clear tonal noise at the same frequency of approximately 100Hz, which is **25dB larger in magnitude than the pink background noise.** There are also numerous tones present at other frequencies which barely present at all in the graph included in the study report.

Only with this type of data can psychoacoustic estimates be made to gauge the impact that this type of audible noise can have on the local community.

It is my hope that the data for this study were recorded with higher spectral resolution than was presented in the study report, and if so, I request that charts showing the study results be regenerated and presented to stakeholders with all available resolution. If the data were not recorded with sufficient resolution, some measurements may need to be repeated to obtain a full

characterization of the noise to allow an estimate of the possible impact of this noise and the necessity of reducing it as part of the relicensing process.

Psychoacoustic impacts and effects of powerhouse tonal noise

The noise data in the study has been A-weighted to model human hearing sensitivity, but the effects and impacts of a continuous audible noise on levels of discomfort and stress are governed by more than just the absolute magnitude or loudness of the noise.

The study did not contain an attempt to evaluate the psychoacoustic effect of the specific non-random (tonal) noise being emitted from the powerhouse. This, as well as high-resolution spectral measurements which more accurately characterize the noise, must be done in order to avoid an oversimplified conclusion that the powerhouse noise is unimportant based solely on the fact that it is not extremely loud. Depending on its characteristics, noise does not need to be loud to cause considerable stress and discomfort. In fact, I have had members of the community tell me that they cannot keep their windows open in summer, or must sleep in a room other than their bedroom due to the powerhouse noise, even in recent years after several mitigating measures had been attempted.

Summary

In summary, the following requests are made regarding the powerhouse noise portion of the LAND-2-Noise study:

1. That powerhouse noise study data be presented to stakeholders with sufficiently high spectral resolution to accurately characterize tonal noise, as shown in the example of the second chart above. If insufficient spectral resolution was recorded, some measurements should be retaken, enough to characterize the actual spectral content of the noise.
2. A psychoacoustic evaluation of the noise should be performed to avoid an oversimplified conclusion of the degree to which the noise may cause stress or discomfort based only on absolute amplitude or loudness.

It is recognized that Item 2 above may be something that would normally be done at a later stage in the relicensing process. If that is the case, then the request associated with item 2 is to ensure that such an analysis is scheduled and included for future undertaking. Such an analysis would require item 1 to be completed.

Best regards,

David S. Rosky
dave.rosky@gmail.com

David S. Rosky
P.O. Box 494
June Lake, CA 93529
dave.rosky@gmail.com

39 June 2024

Southern California Edison Company
Attention: Matthew Woodhall
2244 Walnut Grove Avenue
Rosemead, CA 91770

Stantec
Attention: Patricia Sussman, Ed Bianchi
295 Highway 50, Suite 1
Zephyr Cove, NV 89449-7702

Regarding: FERC Docket P-1389-059, Rush Creek Project Relicensing

Comments on Technical Study Report (TSR) AESTHETICS

Dear Mr. Woodhall,

I appreciate the opportunity to submit the following comments on the AESTHETICS study report for the relicensing of the Rush Creek Project.

Mono County has submitted detailed comments regarding this Study Report, all of which I agree with and corroborate, though I would like to add a comment regarding Horsetail Falls, which the County's comments only touched briefly upon.

These comments are regarding the portion of the study in which images of Horsetail Falls were made to assess its aesthetic value under several conditions of instream flow..

These comments are to bring forth concerns over aspects of the images presented in the Technical Study Report.

I. Horsetail Falls

As Mono County points out in its comments, the viewscape of the Highway 158 corridor is intimately tied to the area's economy. Horsetail falls is a significant element of the June Lake Loop viewscape. During times in spring and early summer, when the falls have a seasonally appropriate amount of flow, many people are attracted to the Loop to view them, which indirectly enhances the area economy.

Part of the study plan is to assess the aesthetic value of the falls at various different flows from several points of interest. Several of the photos included in the Study Report are not of full utility to achieve this goal. In many cases, the angle of view is so large that the waterfall is extremely small in the image. Such a wide angle view is useful, as it helps to determine how the falls look in a full view context, but such a view makes it difficult to assess the actual character of the falls which could be obtained with a narrower view image. Assessing this is important since the aesthetics, i.e., the amount of instream flow which is allowed over the falls, needs to be traded off against the amount of water retained for generation.

In addition, some of the photos presented in the study report contain a significant amount of glare due to be taken at low angle looking toward the sun, for example photo #5 showing the falls from a distance with 9.1 CFS flow rate. In this photo it's difficult to discern what the falls look like from the point of interest.

Requests

The following requests are made:

1. At this time a request is made that SCE provide the full resolution RAW files for all of the images taken for this part of the study as recorded by the camera(s). This may allow greater enlargement of details, and greater dynamic range for processing some of the images which contain a significant amount of glare. This would provide additional insights not available from the images published in the PDF report.

Best regards,

David S. Rosky
dave.rosky@gmail.com

From: Jim Mahoney
To: Matthew Woodhall
Cc: Sussman, Patricia; rlockhart@doubleeagle.com; Mark Shoemaker; Ann Marie Mahoney
Subject: Information request
Date: Monday, June 3, 2024 10:19:06 AM

Hi Matt – we appreciate the ongoing calls to review the TSR's and look forward to release of the remaining hydrology and geomorphology reports.

At the meeting in June Lake on April 30th, we raised the question of whether a study and cost analysis had been performed to evaluate the possibility of retrofitting Rush Meadow, Gem and Agnew dams to meet current earthquake standards to allow for greater flood protection and water storage for the June Lake area. I believe the answer was "yes" and it was "more expensive" than the other proposed alternatives, even full decommissioning. It seems now that further studies are being conducted to evaluate potential flooding and sediment flows from the proposed dry lake beds, a review of the retrofitting costs to alleviate the possible flooding and sediment issues makes sense.

With the understanding that retrofitting all 3 dams may be cost-prohibitive, retrofitting Gem alone to allow for maximum storage may be a cost-friendly alternative to solve for flooding and other issues.

Accordingly, Friends of Silver Lake hereby requests you provide to all Stakeholders the study and cost analysis SCE conducted for retrofitting each of the dams to meet earthquake standards and thereby increasing storage, flood protection and minimizing sediment release downstream. We believe that, while we can make a FOIA request to FERC for this information, having SCE provide the information directly to Stakeholders will help avoid any delays in the application process.

We look forward to receiving the requested information.

Thank you,
Jim

Jim Mahoney
Director and Treasurer
Friends of Silver Lake

Cell 714 329-8400

Kendrick Taylor Kendrick Taylor Taylor, RENO, NV.
These comments are related to the SCE relicensing application on Rush Creek, docket number P-1389 and the Full Decommissioning Study (March 2024). I have a house in the Peterson track and the helicopter noise from this project will be intense.

The noise study (FERC Project No. 1389, Land 2) is flawed because the model study uses ground impedances that result in an under estate of the noise levels. The ground impedances are set in a pulldown menu in the BaseOps model. In this study the modelers used two acoustic impedances, one for water, and one for soft ground such as grass (see page 8 of Noise study). The area covered by water is small and has negligible effect on the result. All other areas are designated as a soft surface, not exposed rock such as exists on Carson Peak and the cliffs northwest of the June Mountain. Changing the modeled surface from grass to the actual rock surfaces would increase the noise (see page 106 of the BaseOps Manual https://www.denix.osd.mil/dodnoise/denix-files/sites/99/2024/01/BaseOps_User_Guide.pdf). The model also does not account for reflections (https://www.denix.osd.mil/dodnoise/denix-files/sites/99/2024/01/BaseOps_User_Guide.pdf) off rock such as the vertical rock face of Carson Peak that is ABOVE the flight path and the rock face to the northwest of the June Mountain. The model also does not account for the increased noise associated with stabilizing an exterior load during final approach.The model understates what the noise will be because the modeling parameters are not representative of the actual conditions.

The number of helicopter round trips is large, up to 12,074 in the full removal option (see Full Decommission Study, March 2024, tables 2-11). This understates the total number of overflights for two reasons. First, because each round trip will result in two overflights of my neighborhood. Second, it does not include flights for restoration or moving equipment to the dam sites. Hence the total number of overflights will exceed what is stated in the report by more than a factor of two. Most of these flights (84%) will be with a skycrane helicopter with noise levels that will exceed 80 dB in my neighborhood. The house rattling noise of 24,000 overflights during 10 summers will make our neighbor nearly unlivable and will greatly affect the use and value of our homes. It will also have a large detrimental impact on our tourist based economy.

The draft application does not address if the noise will be in compliance with Mono county ordinances and what will happen if the Mono County noise ordinances are exceeded.

The proposed options only consider removing dam debris via helicopter. Using helicopters to move the debris has two major problems. First, the noise impacts to the residents and business in June Lake will be overwhelming for up to ten summers. Second, there is a conflict between SCE use of the June Mountain Parking lot and June Mountains summer operations. June Mountain has stated the SCE operations will create logistic conflicts with summer operations and has not agreed to this. The proposed SCE operations and June Mountain operations both require a USFS special use permit and are in conflict. Smaller SCE helicopter operations have been coordinated with June Mountain, but the magnitude and duration of the proposed activities are more than ten times previous SCE operations. There needs to be a plan to manage this conflict before the proposed options can be considered.

I request that two other options be considered. The first additional option is to removing material via an upgraded tram. Eighty years ago the tram was used to move material up to build the dams, an upgraded tram can be used to move the dam debris down. SCE has been reluctant to seriously consider this option. The second additional option is leave more material on the mountain. The concept would be to excavate a hole and stockpile the material from the hole. The hole would then be filled with debris from the dams. The stockpile material would be used to cover the debris and restore the site. It may be that this approach has fewer environmental impacts than 24,000+ flights with a massive helicopter. Both of these additional options would greatly reduce the helicopter impacts on my community and allow for management of conflicts with June Mountain summer operations.

Document Content(s)

131188.txt.....1