

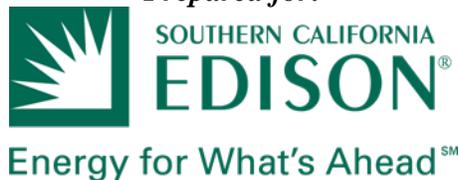
Version 3.0  
Plan Issued on December 5, 2018  
Comments Due on January 7, 2019

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# **REVISED DRAFT RECREATION FACILITIES CONDITION AND PUBLIC ACCESSIBILITY STUDY PLAN**

**BISHOP CREEK HYDROELECTRIC PROJECT  
(FERC PROJECT NO. 1394)**

*Prepared for:*



**Bishop, California**

*Prepared by:*

**Kleinschmidt**

Portland, Oregon  
[www.KleinschmidtGroup.com](http://www.KleinschmidtGroup.com)

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## **1.0 INTRODUCTION**

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Southern California Edison Company (SCE) is the licensee, owner and operator of the Bishop Creek Hydroelectric Project (Project) (Federal Energy Regulatory Commission [FERC] Project No. 1394). The Project is located on Bishop Creek in Inyo County, California, approximately 5 miles southwest of the city of Bishop (Figure 1-1). SCE operates the Project under a 30-year license issued by FERC on July 19, 1994. As the current license is due to expire on June 30, 2024, SCE initiated the formal relicensing process utilizing the Integrated Licensing Process (ILP) by filing the Notification of Intent (NOI) and Pre-Application Document (PAD) with FERC on **XXXX**.

In advance of filing the NOI and PAD, SCE worked with stakeholders to identify necessary studies, with the goal of accelerating FERC's ability to issue a Study Plan Determination. Efforts began over 1 year before formal initiation of the process with FERC, through a series of Technical Working Group (TWG) meetings held in Bishop, California.

During these TWG meetings, stakeholders identified the need to conduct a Recreation Facilities Condition and Public Accessibility Study to assess the condition of and accessibility to existing recreation facilities at the Project. The study will estimate future facility and accessibility needs, as well as analyze the economics of current and future operation and maintenance (O&M) of Project-related recreation facilities. This Study Plan details the study objectives, study area, methods and schedule for the Recreation Facilities Condition and Public Accessibility Study.

Appendix A is a consultation summary of discussions specific to this plan, along with a table that summarizing stakeholders' comments on previously reviewed versions, and how SCE addressed

those comments. Should SCE not incorporate a comment or request, SCE will provide rationale based on Project specific information and FERC ILP Study Plan criteria.

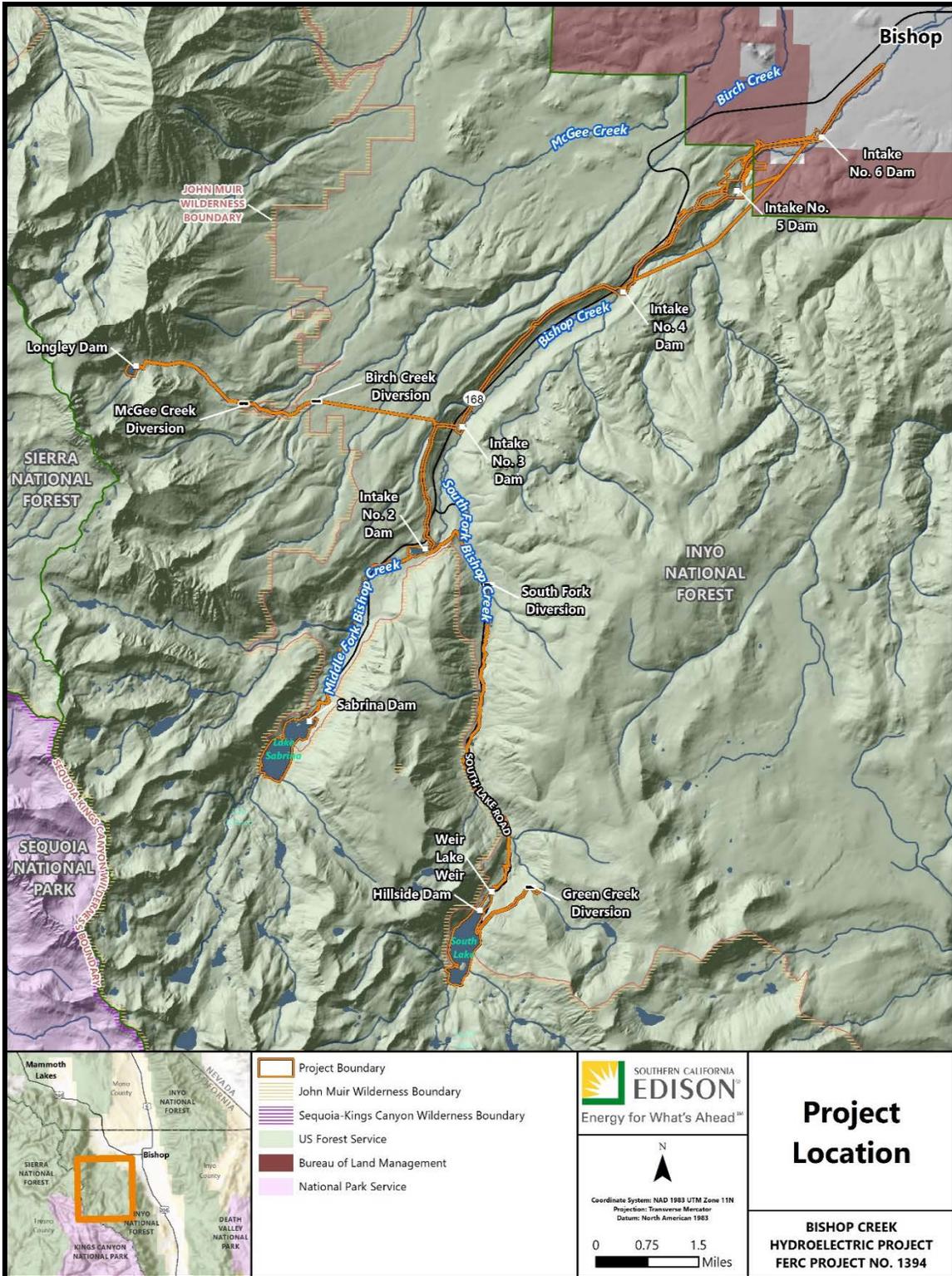


FIGURE 1-1 PROJECT LOCATION

## **2.0 PROJECT NEXUS**

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Most recreation within or adjacent to the Project is located within the Inyo National Forest (Forest Service) and thus the Forest Service has Federal Power Act Section 4(e) conditioning authority to prescribe conditions that may mitigate the impact of hydropower projects on National Forest Service lands. Therefore, beyond the assessment of amenities within the Project boundary and required by the current license, it is also reasonable to include other Forest Service recreation sites that intersect or are immediately adjacent to the Project boundary, that may have been induced or could be indirectly affected by the presence of the Project.

## **3.0 STUDY GOALS AND OBJECTIVES**

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This Study Plan includes the following goals and objectives:

- For Project-related recreation areas, assess the condition of existing recreation facilities
  - Full facility condition assessment and inventory at existing recreation facilities directly related to the Project, including an evaluation of signage, public safety features and visual and aesthetic qualities
  - Assess the condition and potential for universal accessibility, where feasible
  - Assess the condition of access roads and parking areas associated with Project-related recreation
- For other recreation sites near the Project, document the presence of dispersed use outside of the boundary of developed recreation sites
  - Assess the carrying capacity and potential need for expansion, or alteration of existing recreation facilities
  - Assess the need to formalize or reclaim (due to environmental concerns) dispersed or informal use areas
- Analyze economics of current and future Project-related O&M of recreation facilities
  - Conduct an economic analysis to understand the current cost of ownership and maintenance performance by concessionaires
  - Analyze options for improving concessionaire agreements and/or leveraging funds or resources to help offset costs of facility improvements and ongoing O&M for recreation facilities

- Ensure that future Project facilities and operations are not inconsistent with the Desired Conditions described in the Land Management Plan for the Inyo National Forest (USDA 2018) for Social and Economic Sustainability and Multiple Uses

#### **4.0 REVIEW OF EXISTING INFORMATION**

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This Study Plan will review and incorporate existing information related to recreational access and condition of existing facilities at the Project. The following is a brief description of studies and reports to be analyzed as part of this study:

- 1) *2015 Licensed Hydropower Development Recreation Report, FERC Form No. 80 (SCE 2015a)*

Pursuant to 18 Code of Federal Regulation (CFR) §8.11, the FERC Form No. 80 (Form 80) is designed to document overall recreation use of Project lands and waters at each development, as well as recreation use at all publicly available recreation amenities within the FERC Project boundary. In 2014, SCE collected recreational use data at recreation facilities within the Bishop Creek FERC Project boundary to estimate annual use, peak season use, peak weekend use and capacity utilization of each amenity. SCE filed its most recent Form 80 report on March 26, 2015, reporting recreational use data for the 2014 calendar year at Intake No. 2, Lake Sabrina and South Lake.

- 2) *2014 SCE Recreation Use Study Report for Eastern Hydro Division (SCE 2015a)*

The main purpose of SCE’s 2014 report was to gather the necessary data to complete the required Form 80 report. This report, however, goes into further detail and discusses more recreation sites than required by the Form 80 report.

- 3) *2015 California Statewide Comprehensive Outdoor Recreation Plan (CDPR 2015)*

According to the California Department of Parks and Recreation (CDPR), California Statewide Comprehensive Outdoor Recreation Plan (SCORP) “provides a strategy for statewide outdoor recreation leadership and action to meet the state’s identified outdoor recreation needs” (CDPR 2015). While the 2015 SCORP does not offer specific data regarding current and future recreation needs, the following two reports are essential elements used in its development that provide information relevant to strategies and action priorities in the Sierra Planning Area: 2012 Survey on Public Opinions and Attitudes on Outdoor Recreation in California Complete Findings (CDPR 2014); and Outdoor Recreation in California’s Regions 2013 (CDPR 2013).

4) *2016 National Visitor Use Monitoring Report for Inyo National Forest (USFS 2018d)*

The National Visitor Use Monitoring Program (NVUM) has two goals: 1) to produce estimates of the volume of recreation visitation to national forests and grasslands, and 2) to produce descriptive information about that visitation, including activity participation, demographics, visit duration, measures of satisfaction, and trip spending connected to the visit (USFS 2018d). The most recent visitor use report for the Inyo National Forest was updated on January 21, 2018, and summarizes data collected during fiscal year 2016.

5) *Inyo National Forest Special Use Permits and Concessionaire Data*

Data collected by the Inyo National Forest regarding management of recreation sites, specifically campgrounds, and issuance of wilderness permits for dispersed use will be a valuable resource in establishing existing use in the Project area.

6) *Inyo National Forest Alternative Transportation System Study (USDA 2013)*

Transportation, parking and visitor use data for the Bishop Creek Basin study, performed in 2011 will be used as historical use data, to compare with the results of this study.

The study will analyze relevant management plans for the area, including: Inyo County General Plan (IC 2001), Land Management Plan for the Inyo National Forest (USDA 2018), and the Bureau of Land Management's (BLM) Bishop Resource Management Plan Record of Decision (BLM 1993).

## **5.0 STUDY AREA**

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Table 5-1 lists the specific sites to be studied in this effort. A full facility condition assessment will be performed by a landscape architect on the three recreation areas directly related to the Project: Lake Sabrina Recreation Area, South Lake Recreation Area and Intake No. 2 Recreation Area<sup>1</sup>. Other Forest Service recreation sites in the Project area will be assessed for dispersed use impacts.

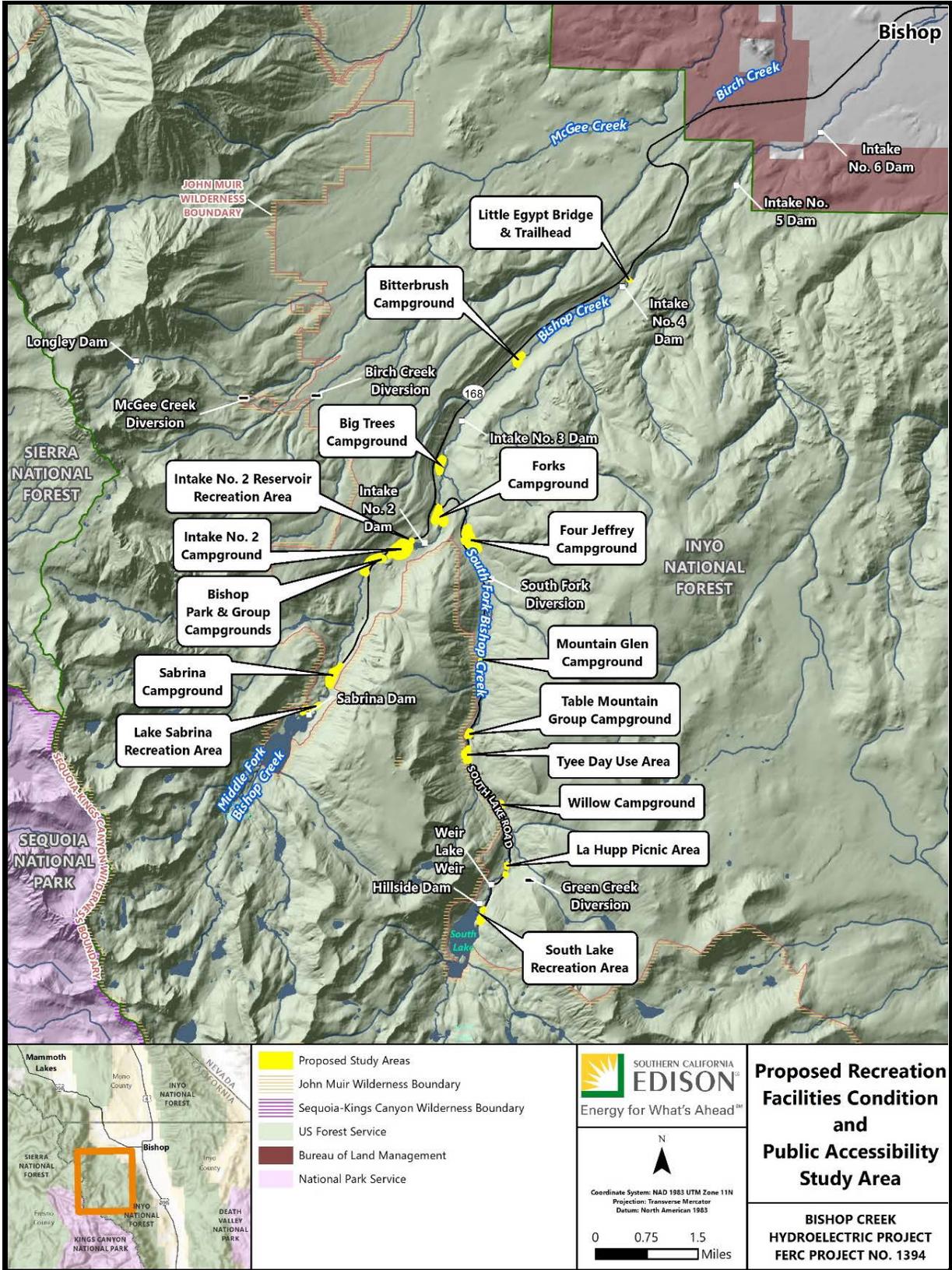
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<sup>1</sup> A basic inventory of all sites will be conducted as part of the Recreation Use and Needs Study Plan.

**TABLE 5-1 SITES TO BE STUDIED**

Site ID	Name	Full Facility Condition Assessment	Dispersed Use Assessment Only
<i>Middle Fork Bishop Creek</i>			
MF01	Lake Sabrina Recreation Area <sup>1</sup>	✓	
MF03	Sabrina Campground		✓
MF04	Bishop Park Campground		✓
MF05	Bishop Park Group Campground		✓
MF06	Intake No. 2 Campground		✓
MF07	Intake No. 2 Recreation Area <sup>1</sup>	✓	
MF08	Forks Campground		✓
MF09	Big Trees Campground		✓
<i>South Fork Bishop Creek</i>			
SF01	South Lake Recreation Area <sup>1</sup>	✓	
SF02	Green Creek Diversion (informal trail use)		✓
SF03	La Hupp Picnic Area		✓
SF04	Willow Campground		✓
SF05	Tyee Day Use Area		✓
SF06	Table Mt Group Campground		✓
SF07	Mountain Glen Campground		✓
SF08	Four Jeffrey Campground		✓
<i>Bishop Creek</i>			
BC01	Bitterbrush Campground		✓
BC02	Little Egypt Area (informal access to climbing area)		✓

<sup>1</sup>Note: The only Project-required recreation facilities are the South Lake boat ramp, Lake Sabrina boat ramp, and Intake No. 2 fishing platforms. All other facilities are non-Project. Resource; SCE 2015a



**FIGURE 5-1 PROPOSED RECREATION FACILITIES CONDITION AND PUBLIC ACCESSIBILITY STUDY AREA**

## 6.0 METHODS

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### 6.1 FULL FACILITY CONDITION ASSESSMENT AND INVENTORY

A full facility condition assessment will be performed by a landscape architect on the three recreation areas directly related to the Project: Lake Sabrina Recreation Area, South Lake Recreation Area and Intake No. 2 Recreation Area. This inventory is intended to supplement and provide greater detail for these three recreation areas and will be collected in the general site inventory associated with the Recreation Use and Needs Study Plan.

Forest Service directives will be reviewed for condition assessment definitions and purposes to develop methods and forms for use in conducting condition assessments and facility inventories. Generally, the study will include an inventory and cursory condition assessment of the following within the study area:

- Specialized systems (e.g., water, electrical, septic);
- Building envelope, structural elements, and interior soundness;
- Systems and equipment to ensure they operate effectively and appropriately;
- Visual and aesthetic quality of facilities;
- Universal accessibility of facilities;
- Public safety measures;
- Signage and wayfinding; and
- Access roads, internal circulation roads, campsite spurs and parking areas.

The survey will ensure documentation of the current status of routine maintenance and equipment servicing and any items in need of correction, repair, replacement or similar action, noting facility condition according to Table 6-1. All inventories will be documented with photographs and integrated into a geographic information systems (GIS) database with relevant attributes to facilitate future analysis and ongoing assessments based on relevant attributes to facilitate future analysis and ongoing assessment.

**TABLE 6-1 FACILITY CONDITION RATINGS TABLE**

<b>ID</b>	<b>Category</b>	<b>Description</b>
N	Needs replacement	Facility is non-functional or has broken or missing components
R	Needs repair	Facility has structural damage or is in an obvious state of disrepair
M	Needs maintenance	Facility needs maintenance, such as cleaning or painting
G	Good condition	Facility is functional and well maintained

The need for new recreation opportunities, new site development, or modification of existing recreation resources will be assessed based on the results of a full facility condition assessments, dispersed use assessments, site capacity estimates, and user surveys that provide user preferences and opinions regarding needs and crowding for each site and the Project area as a whole. Based on these results, recommendations will be proposed to address future Project facilities and operations, consistent with the Desired Conditions described in the Land Management Plan for the Inyo National Forest (USDA 2018), and then discussed with the TWG.

A report will be prepared documenting the findings of this study. The report will include a detailed inventory and assessment of all site facilities and appurtenant features, including applicable maps and illustrations. The report will address all applicable Desired Conditions, Goals, Standards, and Guidelines of the Land Management Plan for the Inyo National Forest (USDA 2018).

**6.2 DISPERSED USE ASSESSMENT**

A dispersed use assessment will be conducted at certain sites as designated in Table 5-1 above<sup>2</sup>. This study will consist of an initial desktop exercise to scan aerial imagery for evidence of dispersed use or informal access areas such as social trails, brown out areas or impromptu parking around the perimeter of each study area. Aerial imagery will be used to define assumed perimeters of developed sites and will be generally assessed within a 200-foot buffer of each perimeter. These observations will be digitized and attributed within a GIS database to be used in a later field assessment to ground truth those potential dispersed uses and to further assess for signs of user-

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<sup>2</sup> Note that for Sabrina Lake, South Lake and Intake No. 2 Recreation Areas, the perimeter of each reservoir will be included in the assessment.

created roads, trails and/or campsites. Dispersed use will be documented with photographs and integrated into a GIS database with relevant attributes (e.g., spatial location, number of fire rings, or length of roads or trails) to facilitate future analysis and ongoing assessment<sup>3</sup>. Additional qualitative information will be collected, including potential issues or possible accommodations or future recreation opportunities at the sites.

The need to formalize or discourage dispersed use will be assessed based on the results of this assessment, full facility condition assessments, site capacity estimates, and user surveys that provide user preferences and opinions on needs and crowding at each site and the Project area as a whole. Based on these results, recommendations will be proposed to address future Project facilities and operations, consistent with the Desired Conditions described in the “Land Management Plan for the Inyo National Forest” (USDA 2018), to then be discussed with the Recreation TWG.

A report will be prepared documenting the findings of this study. The report will include the collected information, summarized in a narrative to include all observations and a visual representation of the observed dispersed use. The study will also address all applicable Desired Conditions, Goals, Standards and Guidelines of the Land Management Plan for the Inyo National Forest (USDA 2018).

### **6.3 OPERATIONS AND MAINTENANCE ECONOMICS ASSESSMENT**

A desktop study will be conducted to analyze the current economics of O&M the three recreation areas directly related to the Project: Lake Sabrina Recreation Area, South Lake Recreation Area and Intake No. 2 Recreation Area. Past operation costs will be gathered from the Forest Service and its concessionaires and analyzed in conjunction with data collected in the full facility condition assessment to determine the true costs of operating and maintaining these sites. Results of the full facility condition assessment will be reviewed to discuss emerging major maintenance activities and estimate future costs of operation.

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<sup>3</sup> Dispersed use that extends outside of the 200-foot buffer will be analyzed on a case by case basis to determine if the full extent of dispersed use should be documented.

A report will be prepared documenting the findings of this assessment and include the collected information and an analysis of current and future O&M. The report will address all applicable Desired Conditions, Goals, Standards, and Guidelines of the Land Management Plan for the Inyo National Forest (USDA 2018).

## 7.0 SCHEDULE AND REPORTING

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The anticipated Study Plan development and implementation schedule is identified in Table 7-1.

**TABLE 7-1 ANTICIPATED POST PAD/NOI STUDY PLAN DEVELOPMENT MILESTONES AND FERC PROCESS THROUGH STUDY PLAN DETERMINATION**

<b>TASK</b>	<b>RESPONSIBLE ENTITY</b>	<b>SCHEDULE MILESTONES</b>
File NOI/PAD with FERC along with Final Study Plans	SCE	03/29/19
FERC Holds Scoping and Site Visit	FERC	05/30/19 – 06/29/19
FERC Director’s Study Plan Determination	FERC	01/10/20 - 02/09/20
First Field Season	SCE	2020
Initial Study Report (adjust as necessary in consultation with TWGs)	SCE	01/10/21 - 02/09/21
Second Field Season (as necessary)	SCE	2021
Final Study Report	SCE	2022
License Application	SCE	June 2022

Following FERC’s anticipated Study Plan determination in early 2020, it is anticipated to implement the first field season in 2020. FERC’s ILP requires an initial study report 1 year following the determination. This provides opportunities to review results and as necessary adjust scope and methods.

## 8.0 REFERENCES

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Bureau of Land Management (BLM). 1993. Bishop Resource Management Plan Record of Decision. Bakersfield District, Bishop, CA.

California Department of Parks and Recreation (CDRP) 2015. 2015 Statewide Comprehensive Outdoor Recreation Plan. California Department of Parks and Recreation, Sacramento, CA.

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United States Department of Agriculture (USDA). 2018. Land Management Plan for the Inyo National Forest. [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd589652.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd589652.pdf).

United States Department of Agriculture (USDA). 2013. Inyo National Forest Alternative Transportation System Study. United States Department of Agriculture.

**APPENDIX A**  
**Study Plan Consultation Record**

## Appendix A

### Study Plan Consultation Record

This Study Plan was developed in consultation with the Bishop Creek Bishop Creek Recreation and Land-Use Technical Working Group (TWG). The intent of the consultation process is to achieve consensus, to the degree possible, on the need for specific studies, the key resource questions to be addressed by the studies, and the appropriate methodology and level of effort for the study.

This appendix summarizes the key consultation milestones for each Study Plan (Table A-1), and how Southern California Edison Company (SCE) addressed comments received through the consultation process. Table A-2 is a Response to Comments Table for comments received from stakeholders, and how comments were addressed in the final Study Plan. Where stakeholder comments requests have not been incorporated, Table A-2 provides a rationale based on Project specific information and Federal Energy Regulatory Commission's (FERC) Study Plan Criteria (18 Code of Federal Regulation [CFR] § 5.9).

**TABLE A-1 Key Study Plan Development Milestones  
and Technical Work Group Planning Schedule**

<b>DELIVERABLE</b>	<b>MATERIAL DISTRIBUTED</b>	<b>MEETING TYPE</b>	<b>DATES</b>	<b>PROPOSED DATES FOR COMMENTS</b>
Project Description	5/25/2018	TWG	6/4/2018, 6/5/2018, and 6/7/2018	7/9/2018
Annotated Study Plans, Goals, Objectives	7/26/2018	TWG	8/14/2018 and 8/15/2018	8/31/2018
Draft Study Plans	9/17/2018	TWG	10/9/2018 to 10/11/2018	10/26/2018
Final Study Plans	11/15/2018	TWG	12/4/2018 to 12/6/2018	1/7/2019

**TABLE A-2 SCE RESPONSES TO COMMENTS RECEIVED ON STUDY PLANS**

<b>COMMENT NO.</b>	<b>DATE OF COMMENT</b>	<b>ENTITY</b>	<b>COMMENT</b>	<b>SCE RESPONSE</b>
1	8/31/2018	Tristan Leong, US Forest Service	Assessment should include Project visual and aesthetics discussion and evaluation.	<p>SCE is considering this request but would like to discuss in more detail at the next TWG meeting to determine what specific gaps or needs would justify such an assessment.</p> <p><i>Update:</i> Based on clarification and discussion in the October 2018 TWG meeting, SCE agrees to include a visual and aesthetics evaluation at South Lake Recreation Area, Lake Sabrina Recreation Area and Intake No. 2 Recreation Area.</p>
2	8/31/2018	Tristan Leong, US Forest Service	Assessment should include a description and catalog of all signage associated with public access and recreation.	An assessment of recreation, access and safety signage to Project related sites (Lake Sabrina Recreation Area, South Lake Recreation Area, Intake No. 2 Recreation Area) will be included in this Study Plan.
3	8/15/2018 (TWG Meeting)	Diana Pietrasanta, US Forest Service	<p><i>Paraphrased from meeting discussion:</i></p> <p>The 200-foot buffer on developed recreation sites seems arbitrary and should be expanded.</p>	SCE agrees that the 200-foot buffer is arbitrary. The Study Plan will be edited to more generally assess sites for dispersed use because that use may extend beyond 200 feet in some cases. Dispersed impact assessments will be conducted at all sites listed in the Study Plan.

COMMENT NO.	DATE OF COMMENT	ENTITY	COMMENT	SCE RESPONSE
4	8/15/2018 (TWG Meeting)	Nora Gamino, US Forest Service	<i>Paraphrased from meeting discussion:</i> McGee Creek is not included in the study area and has fewer, more remote facilities, but we may want to consider its hiking facilities and roads, which are used for both mountain biking and hiking.	Facilities or sites associated with the McGee Creek area, most notably the trailhead for Longley Lake, will be assessed for inclusion in the study area.
5	8/15/2018 (TWG Meeting)	Diana Pietrasanta, US Forest Service	<i>Paraphrased from meeting discussion:</i> User-created trails should be captured in this inventory. Specifically, there are many informal climbing trails at Project reservoirs and an informal trail that extends three quarters of the way around Lake Sabrina that are not official US Forest Service trails and receive no maintenance money.	Trail geographic information system (GIS) data obtained from the U.S. Forest Service (USFS) will be used to identify user-created trails that are not currently part of the (USFS) trail system and that may be Project induced. Initially, this will be a desktop exercise that will be ground-truthed and expanded as additional trails are identified.