



Wayne P. Allen
Principal Manager
Regulatory Support Services

Filed Electronically

July 24, 2020

Kimberly D. Bose, Secretary
Nathaniel J. Davis, Sr., Deputy Secretary
Federal Energy Regulatory Commission
825 First Street, N.E.
Washington, D.C. 20426

**Subject: Bishop Creek Hydroelectric Project, FERC Project No. 1394
Progress Report 3**

Southern California Edison Company (SCE) hereby files with the Federal Energy Regulatory Commission (FERC) its third Progress Report for the Bishop Creek Project (Project No. 1394).

SCE will forward the "Acceptance for Filing" e-mail generated by FERC's e-filing service to all contacts on the distribution list either via e-mail or U.S Mail, as appropriate. This filing will also be placed on SCE's Bishop Creek Relicensing Website (www.sce.com/bishopcreek) where it will be available for download, and available for review by appointment at the Bishop Creek Hydro Headquarters Office – 4000 E. Bishop Creek Road, Bishop, CA 93514.

SCE looks forward to continuing to work with FERC and other interested parties on the Bishop Creek relicensing. Should there be any questions or concerns regarding this filing please contact Matthew Woodhall, Senior Regulatory Advisor, by phone at (626) 302-9596 or via e-mail at matthew.woodhall@sce.com.

Sincerely,

DocuSigned by:

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Wayne P. Allen
Principal Manager

Attachments:

- Progress Report 3 Memorandum and Appendices

MEMORANDUM

TO: Federal Energy Regulatory Commission
Docket P-1394-080

FROM: Bishop Creek Relicensing Team

CC: Technical Work Groups
FERC Distribution List

DATE: July 24, 2020

RE: Quarterly Study Progress Report No. 3

INTRODUCTION

On November 4, 2019, the Federal Energy Regulatory Commission (FERC) approved Southern California Edison's (SCE) Technical Study Plan (TSP) for the relicensing of the Bishop Creek Project (FERC No. 1394). As provided for in 18 Code of Federal Regulation (CFR) 5.11(b)(3), the TSP included provisions for periodic progress reports. These progress reports are to be distributed to the Technical Working Groups (TWG) and the Federal Energy Regulatory Commission (FERC) on a quarterly basis as required by the Study Plan Determination (SPD).¹ The progress reports are intended to be brief, technical memoranda that will at a minimum summarize work completed to date, any deviations from previously described methods, and any unforeseen issues that may warrant further stakeholder consultation. This memorandum serves as the third progress report for the Bishop Creek Project. The Initial Study Report (ISR) will serve as the final quarterly progress report, which is to be filed no later than November 4, 2020.

The relicensing process requires a study report meeting to be held within 15 days of filing the ISR, and accordingly, SCE will contact agencies to assess availability prior to confirming the filing date of the ISR. Additionally, SCE held a one-day TWG meeting on May 7, 2020 to review 2019 study results and discuss upcoming field work for the 2020 season.

PROGRESS REPORT

SCE completed or initiated several resource studies in 2019 as outlined in the revised TSP and SPD. As such, several studies are in their second year of surveys while other resource areas are just beginning in 2020. Table 1 provides a summary of the field efforts conducted to date and a schedule for remaining studies. Those studies impacted by the COVID-19 pandemic are identified in the table below. SCE will provide individual study reports in the ISR.

CDFW submitted comments on Progress Report 2 and the studies conducted in 2019 to SCE after the May 2020 TWG meeting. Those comments and SCE responses are included as Attachment 1 to this Progress Report.

¹ Issued by FERC on November 4, 2019.

TABLE 1 BISHOP CREEK HYDRO RELICENSING PROJECT 2019 FIELD STUDY SUMMARY

STUDY NAME	STATUS	MODIFICATIONS TO METHODOLOGY AND/OR NEEDED CONSULTATION
TERRESTRIAL AND BOTANICAL STUDIES		
TERR 1 – Assessment of Bishop Creek Riparian Community	SCE conducted riparian vegetation surveys throughout the 2019 field season focusing on the regulated stream reaches below project diversions and reservoirs.	No changes or modifications to methodology and no additional field work is anticipated for the duration of this relicensing process.
TERR 2 – Invasive Plants	SCE conducted surveys for invasive plants on multiple visits to the study area during the 2019 field season, focused on a 500-foot survey area around each Project facility (i.e., powerhouses, dams, diversions, valve houses, access roads, and recreation facilities within the Bishop Creek Project area) and a larger survey area around Plant 4 to document black locust populations. Final surveys at recreation facilities and Plant 4 are being conducted during the 2020 survey period.	No changes or modifications to methodology.
TERR 3 – Assessment of Special Status Plants	SCE conducted surveys for special status plants on multiple visits to the study area during the 2019 field season. The study area consisted of a 500-foot survey area around Project facilities including powerhouses, dams, diversions, valve houses, and access roads. Final surveys at recreation facilities will be conducted during the 2020 survey period.	No changes or modifications to methodology and no additional field work is anticipated for the duration of this relicensing process.
TERR 4 – Wildlife	Surveys for general wildlife, special status amphibians, and a bat habitat assessment were performed in 2019. A winter roost survey was conducted in January 2020 and bat acoustic surveys were conducted in June 2020. In 2019, cameras were placed along the above ground flowline at mule deer crossings between Intake 2 and powerhouse No 2.	General wildlife surveys were reduced to one field survey in 2019 and are now complete. In June 2020, two new cameras were placed at wildlife crossing areas to replace those stolen in 2019. No other changes or modifications to the surveys are anticipated.
AQUATICS AND AQUATIC PROCESSES STUDY PLANS		
AQ 1 – Instream Flow Needs and Assessment	In March 2020, SCE calibrated the hydraulic component of the PHABSIM model and ran habitat suitability simulations for all PHABSIM study reaches, drafted a report, reviewed it with the Aquatic TWG.	No changes or modifications to methodology is anticipated. SCE solicited comments from the TWG regarding the PHABSIM report. Beginning April 2020, SCE consulted further with CDFW and USFS to develop HSC criteria for Owens speckled dace, which will be applied to study reaches 1 and 2. SCE plans to use a Habitat Criteria Method (HCM) in 2020 as recommended by USFS for reaches 4 and 6, and also for the Birch-McGee study area in 2020. This study may be deferred until 2021 pending COVID-19 status and the safety of travel to and from the Project area. SCE has determined that this study could be deferred without impacting the overall licensing schedule.

STUDY NAME	STATUS	MODIFICATIONS TO METHODOLOGY AND/OR NEEDED CONSULTATION
AQ 2 – Operations Model	The Operations Model has been configured and populated with historical data. The Relicensing Team continues to calibrate the model with SCE Operations.	No changes or modifications to methodology.
AQ 3 – Fish Distribution Baseline Study (Creek)	SCE drafted a report and reviewed it with the TWG.	No changes or modifications to methodology and no additional field work is anticipated for the duration of this relicensing process.
AQ 4 –Baseline Fish Distribution Study (Reservoirs)	Electrofishing and surveying for Owens sucker were conducted in June 2020 in Lake Sabrina and South Lake. Additional surveys will be conducted in late summer 2020.	No changes or modifications to methodology. Gill netting at Longley Reservoir originally planned for June 2020 was postponed until late summer 2020 due to USFS permitting office closures related to COVID-19.
AQ 5 – Water Quality	Water Quality sampling is being conducted at Lake Sabrina, South Lake, Intake No. 2 reservoir and locations along Bishop Creek throughout the summer of 2020 as outlined in the revised Water Quality Implementation Plan submitted to FERC in April 2020 with Progress Report 2.	No additional changes or modifications to methodology.
AQ 6 – Sediment and Geomorphology	Channel and substrate surveys were conducted in September 2019.	Fall 2019 work proceeded with no changes or modifications to methodology. After a review of field conditions at bankfull flow, SCE does not believe the planned use of a bed-load sampler can be safely deployed or effectively implemented via wading, and notes that necessary infrastructure (bridges) for deployment of the sampler is not present for the desired sample reaches. To help resolve the question relating to sediment mobility that cannot be answered by the bedload sampling that is not feasible, SCE proposed to perform a tracer rock study during higher flows to understand when various size substrates are mobilized. SCE discussed the change in methods with the TWG during review of the 2 nd progress report in May 2020 and no concerns were raised.
HUMAN ENVIRONMENT AND COMMUNITY STUDY PLANS		
REC 1 – Recreation Use and Needs	Off-site recreation use surveys will be implemented in 2020 and 2021. All other activities, described in REC 1 will be implemented in 2021.	<p>Over the course of the 2019-2020 winter, the USFS indicated a desire to include use of off-site surveys, to be administered in part by the USFS, to answer questions directly related to use, avoidance of use, or desired use in the Bishop Creek area. Through continued consultation with the USFS, off-site surveys are in their final stages of development, awaiting USFS approval for a target implementation in August 2020. SCE will take a lead role in the implementation, collection, and analysis of off-site surveys.</p> <p>In January 2020, the USFS provided news of a recent development in the Bishop Creek area – heavy road construction on South Lake</p>

STUDY NAME	STATUS	MODIFICATIONS TO METHODOLOGY AND/OR NEEDED CONSULTATION
		Road – that would significantly affect the recreational use patterns and scheduled activities for the 2020 recreation season (most notably user counts and surveys). Based on this development, SCE developed a revised implementation schedule for the REC 1 study plan in consultation with the USFS that moves the general recreation field surveys to the 2021 recreation season.
REC 2 – Recreation Facilities Condition and Public Accessibility	This study will be implemented in 2020. The Full Facilities Condition Assessment and ground-truthing of the Dispersed Use Assessment are scheduled for early August 2020.	No changes or modifications to methodology.
LAND 1 – Project Boundary and Lands	This study will be implemented in 2020.	No changes or modifications to methodology.
CULT 1 – Cultural Resources	Field work is planned for the Fall of 2020.	No changes or modifications to methodology. The Relicensing Team has submitted their ARPA permits to the INF Archaeologist. She has approved them. The Forest Supervisor needs to sign off, however, there has been a leadership change, and we are waiting for the new Forest Supervisor to sign them. BLM permits are in place.
CULT 2 – Tribal Resources	This study will be implemented in 2020 and 2021.	Due to COVID-19, the Relicensing Team has had difficulty scheduling interviews with tribes and conducting outreach to tribal councils. The California Stay-at-home order in the Spring of 2020 impacted interviews surrounding flowering season which will likely take place Spring 2021. Background research has been initiated and no changes to methodology are expected.



Matthew Woodhall
Project Manager
Regulatory Support Services

July 7, 2020

VIA EMAIL

California Department of Fish and Wildlife
Scott Wilson, Environmental Program Manager
Inland Deserts Region
3602 Inland Empire Boulevard, Suite C- 220
Ontario, CA 91764

Dear Mr. Wilson,

SCE is in receipt of your Comments on the May 21, 2020 letter concerning Bishop Creek FERC Relicensing Technical Study Report Appendices, A-H (FERC Project #1394). We are appreciative of the time and thorough review conducted by the California Department of Fish and Wildlife (CDFW). This letter is intended to describe the manner in which SCE intends to address the comments.

In general, the comments were constructive and can be adopted to facilitate SCE's preparation for the next formal Federal Energy Regulatory Commission (FERC) milestone as part of the Bishop Creek relicensing effort. As explained in the transmittal memo accompanying the Progress Report, the intent of the technical memoranda was to summarize work to date and discuss any changes to the upcoming field program in 2020 that might be warranted based on data collected, or emerging issues. These changes could include methods changes, or scheduling adjustments that might be warranted as a result of new information. The memoranda were not intended to be full study reports.

Comments provided by your department, as well as those of the Inyo National Forest will be addressed in the Initial Study Report (ISR) and discussed at the associated study report meeting, which will be scheduled for the November 2020 timeframe. Our study leads have reviewed your comments and have prepared responses in the attached Response to Comments Table (Attachment 1), indicating how the ISR may be developed to address your questions and suggestions.

Of the comments provided, only one had an immediate bearing on the execution of work planned for this summer. Therefore, we call your attention to our response to Item 34 (Water Quality). Please feel free to reach out to me at (626) 302-9596, if you feel this item needs more discussion. We will continue to work with the local Bishop staff as well as Ms. Wood as we move through the process.

Sincerely,

A handwritten signature in blue ink that reads "Matt Woodhall".

Matthew Woodhall
Project Manager

Mr. Scott Wilson
Page 2 of 2
July 6, 2020

Cc: Trisha Moyer, CDFW
Alyssa Marquez, CDFW
Brandy Wood, CDFW
Steve Parmenter, CDFW

Attachment

ATTACHMENT 1: RESPONSE TO COMMENTS TABLE

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
1	General	May 21, 2020	CDFW	All Technical Study Reports should recapitulate the study goals and objectives set out in the Volume III Technical Study Plans.	The technical memoranda accompanying the progress reports were not intended to be study reports, but rather interim progress reports as the team prepares for the upcoming field season; goals and objectives were included in the PowerPoint presentation to the Technical Working Groups (TWGs) to provide guidance and will be added to future reports. Future Interim Study Reports will include an overview of FERC milestone status to help the TWG evaluate status of the effort.
2	General	May 21, 2020	CDFW	Assessment/analysis of Project operation impacts should be addressed in all Technical Study Reports.	The technical reports provided as a supplement to the progress reports are interim work-products intended to summarize work to date and help the team prepare for additional field work and were not intended to be full "Study Reports." The primary objective is to develop consensus that the studies were implemented per the study plan methodologies, and that presented data is understandable and meets the needs of the study. It is too early to include analysis of Project operations impacts. As explained in the May 7 TWG meeting the Initial Study Reports, due in November, 2020 will have additional details for those studies that are complete or nearing completion; once we have stakeholder agreement that they support the complete dataset, the TWG can consider impact analysis and protection, mitigation, and enhancement (PME) measure development.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
3	General	May 21, 2020	CDFW	<p>Technical Study Reports did not address the study goal/objective that ensures future Project facilities and operations are consistent with the desired conditions described in the Land Management Plan for the Inyo National Forest (USDA 2018). SCE should either list the desired conditions in the Technical Study Reports or list the Land Management Plan for the Inyo National Forest (USDA 2018) in the reference section with the appropriate chapter, section, sub-section, and page numbers.</p>	<p>SCE agrees that this will be appropriate and useful information when we are summarizing the reports and their conclusions, relative to our goals and objectives. To the extent that some interim reports discussed desired future objectives, the Team will wait until studies are complete and data accepted before continuing that analysis.</p>
4	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	<p>The Vegetation Guild Analysis Technical Memo (Technical Memo) identifies that the primary goal of the original monitoring program was to determine relationships, if any, between variations in stream flow and changes in riparian habitat attributable to the Project. CDFW is concerned that the Technical Memo does not identify all of the goals and objectives within the Technical Study Plan.</p>	<p>The goals and objectives, relative to the relicensing studies, will be described and discussed in the Initial Study Report (ISR) and will integrate, as appropriate results from this analysis as well as the riparian monitoring reports.</p>

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
5	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	CDFW is concerned that the methods identified within the Technical Memo only assess the cover and guild assignment and do not adequately address all of the goals and objectives set by the Technical Study Plan. CDFW recommends the methodology and the analysis be modified to address all of the goals and objectives in the Technical Study Plan.	<p>The methodology and rationale for the Guild Analysis was provided to the TWG members before and during the scoping process and was approved by FERC in its November 4, 2019 Study Plan Determination.</p> <p>In November 2020, SCE will provide the ISR for TWG review; the Integrated Licensing Process (ILP) provides for an opportunity to review the methods at that time and make adjustments as necessary. In preparation for that discussion, SCE's ISR will lay-out the goals and objectives and discuss whether the data collected satisfies the FERC approved study plan.</p>
6	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	The Technical Memo should define what 'significant' means and how a decision of 'no significant difference' is made (i.e. black cottonwood cover declined but as of 2019 cover was <i>not significantly</i> different from 2014 and appears to have stabilized).	The ISR will address this request.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
7	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	The Technical Memo concludes: <i>In general, monitoring results have indicated that the minimum flow releases have been associated with significant growth of riparian vegetation in stream reaches that were historically dry in summer.</i> CDFW recognizes there has been a significant growth of riparian vegetation in stream reaches that were historically dry in the summer, however, this conclusion does not address the goals and objectives of the Technical Study Plan.	To address this comment, results, relative to goals and objectives of the approved study plan will be addressed in the ISR.
8	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	The Technical Memo categorizes the vegetation sampled during the field data collection into guilds as described in Lytle et al (2017). CDFW is concerned that the “lumping” of species into guilds blurs the results, analysis, and the intent of the Technical Study Plan’s goals and objectives.	To address this comment, the methods for the study, relative to goals and objectives of the approved study plan will be addressed in the ISR. The ISR study meeting and prescribed FERC process will be an appropriate venue for discussing whether adjustments are needed.
9	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	The current methodology seems to ignore the second goal/objective entirely by continuing to use guilds. Additionally, it is difficult to determine the species composition of the riparian community and to look for trends in species abundance with the current methodology.	The guild analysis was a response to an INF request and was not intended to replace the more detailed analysis of cottonwood abundance. This will be addressed in the ISR.
10	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	It is unclear and should be considered whether the upstream barriers may be negatively impacting the downstream black cottonwood populations by altering flow regimes or if sediment capture and removal behind these barriers may be impacting these black cottonwood populations.	For the ISR, SCE will include a discussion of the potential impacts of barriers to downstream black cottonwood communities.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
11	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	<p>CDFW recommends the following:</p> <ol style="list-style-type: none"> 1. Document the changes between historic and current flow regimes. 2. Compare species distribution, composition, age classes, and growth rates of the dominant woody species. 3. Document the age structure of black cottonwood along Bishop Creek and compare with historic flow regimes or with nearby control sites. 4. Utilize data to develop and implement management actions to support the continued existence of black cottonwood in Bishop Creek. Management actions could include, but are not limited to, downstream sediment deposition and/or altering flow regime based on natural conditions. 	<p>These suggestions are noted and will be addressed in the ISR. Relative to comment 4, SCE intends to address potential management options following TWG review of study results and acceptance of data</p>
12	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 21, 2020	CDFW	<p>The technical study report should either list the specific desired conditions in the Technical Reports or list the Land Management Plan for the Inyo National Forest (USDA 2018) in the reference section (hyperlink could be useful) with the appropriate Chapter, section, sub-section, and page numbers.</p>	<p>SCE agrees that this will be appropriate and useful information when we are conducting the impact analysis, relative to our goals and objectives. The impact analysis will occur after the studies have been completed and data has been reviewed and discussed with the TWG</p>

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
13	Invasive Plants Study Plan Technical Memo (TERR 2)	May 21, 2020	CDFW	There was no assessment of this goal/objective: <i>Assess the extent to which the Project may contribute to the spread of invasive plants which could adversely impact native ecosystems in the study area.</i> CDFW recommends the technical memo provide an assessment of project related contributions to the spread of invasive plants.	The technical memos were provided as a supplement to the progress reports, and are interim work-products intended to summarize work to date and help the team prepare for additional field work. These status memos were not intended to be full “Study Reports”. In general, it is too early to include analysis of Project operations impacts. As explained in the May 7, 2020 TWG meeting, the Initial Study Report, due in November 2020, As explained in the May 7 TWG meeting the Initial Study Reports, due in November, 2020 will have additional details for those studies that are complete or nearing completion; the full impact analysis will occur after the studies have been completed and data has been reviewed and discussed with the TWG.
14	Invasive Plants Study Plan Technical Memo (TERR 2)	May 21, 2020	CDFW	This goal/objective was not addressed: <i>Ensure that future Project facilities and operations are consistent with the Desired Conditions, Goals, and Standards described in the Land Management Plan for the Inyo National Forest (USDA 2018) as they relate to ecological sustainability and biodiversity.</i> The Technical Memo should either list the specific desired conditions in the Technical Reports or list the Land Management Plan for the Inyo National Forest (USDA 2018) in the reference section (hyperlink could be useful) with the appropriate Chapter, section, subsection, and page numbers.	SCE agrees that this will be appropriate and useful information when we are conducting the impact analysis, relative to our goals and objectives. This analysis would typically occur after the ISR and associated meeting.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
15	Bishop Creek Rare, Threatened, Endangered (RTE) Plant Survey	May 21, 2020	CDFW	There was no assessment of this goal/objective: <i>Assess the extent to which the Project may affect rare, threatened, endangered or other special status species.</i> CDFW recommends the Technical Memo address the extent of project related impacts to rare, threatened, endangered or other special status plant species.	The technical memos were provided as a supplement to the progress reports, and are interim work-products intended to summarize work to date and help the team prepare for additional field work. SCE agrees that this will be appropriate and useful information when we are conducting the impact analysis, relative to our goals and objectives. This analysis would typically occur after the ISR and associated meeting.
16	Bishop Creek Rare, Threatened, Endangered (RTE) Plant Survey	May 21, 2020	CDFW	This goal/objective was not addressed: <i>Ensure that future Project facilities and operations are consistent with the Desired Conditions, Goals and Standards described for animal and plant species in the Land Management Plan for the Inyo National Forest (USDA 2018).</i> Should either list the specific desired conditions in the Technical Reports or list the Land Management Plan for the Inyo National Forest (USDA 2018) in the reference section (hyperlink could be useful) with the appropriate Chapter, section, sub-section, and page numbers.	The technical memos were provided as a supplement to the progress reports, and are interim work-products intended to summarize work to date and help the team prepare for additional field work. SCE agrees that this will be appropriate and useful information when we are conducting the impact analysis, relative to our goals and objectives. This analysis would typically occur after the ISR and associated meeting.
17	Bishop Creek General Wildlife Technical Memo	May 21, 2020	CDFW	The Technical Memo did not assess if the resident mule deer herd/and or other wildlife species are affected by or alter their migratory patterns in response to Project infrastructure or operation. The Technical Memo only provides evidence that some deer are using the existing crossing structures.	The technical memos were provided as a supplement to the progress reports, and are interim work-products intended to summarize work to date and help the team prepare for additional field work. SCE agrees that this will be appropriate and useful information when we are conducting the impact analysis, relative to our goals and objectives. This analysis would typically occur after the ISR and associated meeting.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
18	Bishop Creek General Wildlife Technical Memo	May 21, 2020	CDFW	The Technical Memo identifies management species and other special-status species and the parts of the Project area they utilize but the time/season of usage at the locations should be more thoroughly described for all species.	The technical memos were provided as a supplement to the progress reports, and are interim work-products intended to summarize work to date and help the team prepare for additional field work. The information requested here would be appropriately developed after the completion of the ISR.
18	Bishop Creek General Wildlife Technical Memo	May 21, 2020	CDFW	This goal/objective was not addressed in the Technical Memo: <i>For those special status species with high potential of utilization, or have been determined to be present, assess potential for Project impact. Identify the potential effects of continued Project operations on the habitats and associated wildlife within the Wildlife Study Plan Area.</i>	The technical memos were provided as a supplement to the progress reports, and are interim work-products intended to summarize work to date and help the team prepare for additional field work. SCE agrees that this will be appropriate and useful information when we are conducting the impact analysis, relative to our goals and objectives. This analysis would typically occur after the ISR and associated meeting.
20	Bishop Creek General Wildlife Technical Memo	May 21, 2020	CDFW	Resource Management Plans and Guidelines should be provided in the Technical Memo.	The technical memos were provided as a supplement to the progress reports, and are interim work-products intended to summarize work to date and help the team prepare for additional field work. SCE agrees that this will be appropriate and useful information when we are conducting the impact analysis, relative to our goals and objectives. This analysis would typically occur after the ISR and associated meeting.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
21	Instream Flow Incremental Methodology Technical Memo	May 21, 2020	CDFW	This goal was accomplished as written in the Technical Memo, but it differs from the <i>Goals and Objectives</i> stated in the <i>Volume III Technical Study Plans</i> . The Technical Memo did not address Section 3.1.2.8 Macroinvertebrates in Technical Study Plans: <i>SCE intends to address the potential impacts within the Phase 1 IFIM study, by characterizing the dominant substrates inventoried during the mesohabitat survey and applying literature to discuss how the presence/absence of suitable substrates affect their distribution.</i>	This comment, relative to goals and objectives of the approved study plan will be addressed in the ISR.
22	Instream Flow Incremental Methodology Technical Memo	May 21, 2020	CDFW	The intended meaning of “optimal habitat suitability” should be defined in the methods section, or possibly replaced by a more appropriate term....Most of the brown trout weighted usable area curves (WUA) do not reach their peak in the narrow range of flows that were simulated. Therefore, the ‘optimum’ cannot be stated. The study design does not require the determination of optimal, so replacement of the term with a more appropriate term should not be controversial. CDFW recommends replacing the term ‘optimum’ with ‘modelled boundary’ in most cases.	SCE notes CDFW’s distinction and will address this in the ISR. SCE also notes that the CDFW’s general comment that “ <i>Most of the brown trout weighted usable area curves (WUA) do not reach their peak in the narrow range of flows that were simulated</i> ” will also be addressed in the ISR.
23	Instream Flow Incremental Methodology Technical Memo	May 21, 2020	CDFW	Page 2-9. The reference to ‘adult suitability’ should be clarified to indicate which species is being characterized.	SCE notes CDFW’s recommendation and will address this in the ISR.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
24	Instream Flow Incremental Methodology Technical Memo	May 21, 2020	CDFW	Page 2-10. Use of the word 'embankments' to describe habitat in the reach 5 study site should be reconsidered. To the best of our knowledge no embankments have been constructed within the referenced site.	Edison notes CDFW's distinction and will address this in the ISR.
25	Instream Flow Incremental Methodology Technical Memo	May 21, 2020	CDFW	Page 3-2. References to the Stillwater report should be 'in prep,' not 'in press.'	Edison notes CDFW's distinction and will address this in the ISR.
25	Instream Flow Incremental Methodology Technical Memo	May 21, 2020	CDFW	Page 3-3. The statement 'Maintaining wild populations [of fish] means that recruitment from younger life stages should be optimized' is not correct. No evidence suggests the population is recruitment limited. Maintaining wild populations depends on provision of adequate habitat for populations of adults, not maximizing recruitment.	Edison notes CDFW's distinction; SCE's observation was merely to note that the adult fish lifestage must be recruited from younger lifestages such as juveniles.
27	Instream Flow Incremental Methodology Technical Memo	May 21, 2020	CDFW	Page 3-3. The phrase 'ichthyomechanics in terms of navigating velocities' should be restated using broadly accepted vocabulary. We suspect the intention is to refer to bioenergetics.	SCE notes CDFW's distinction. However, ichthyomechanics refers to the ability of a fish's swimming strength and agility, whereas bioenergetics refers to metabolic processes that support the animal's ability to swim. Based on this definition, SCE feels the term is correctly applied.
28	Bishop Creek Fish Distribution Technical Memo	May 21, 2020	CDFW	[SCE] Addressed but did not specifically refer to naturally reproducing brown trout populations. CDFW recommends the Technical Memo assess the distribution of the naturally reproducing brown trout populations. [Referring to Assess distribution of other fish species in Bishop Creek downstream from Lake Sabrina and South Lake.]	<i>A response to this comment will be provided in the ISR.</i>

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
28	Bishop Creek Fish Distribution Technical Memo	May 21, 2020	CDFW	An analysis was done but no real discussion. CDFW recommends the Technical Memo provide a discussion of the population comparison and the evaluation showing the populations are self-sustaining consistent with levels documented during the 1990s through 2010. [Referring to <i>Obtain population data sufficient to identify the extent to which self-sustaining brown trout populations are consistent with levels documented during the 1990s through 2010 at historic monitoring sites.</i>]	<i>A response to this comment will be provided in the ISR.</i>
30	Bishop Creek Fish Distribution Technical Memo	May 21, 2020	CDFW	Reported in Appendix B but not evaluated. [Referring to <i>Evaluate select, localized water quality parameters that may affect the growth and distribution of fish species.</i>]	SCE notes CDFW's concern and will address this in the study report.
21	Bishop Creek Fish Distribution Technical Memo	May 21, 2020	CDFW	The Technical Memo determined that study results suggest that trout populations within Bishop Creek sample sites are in line with the 'Desired Conditions' described in the Land Management Plan for the Inyo National Forest (USDA 2018). It is unclear how this determination was made. CDFW recommends the Technical Memo provide more detail on the methodology and assessment.	SCE notes CDFW's observation and will address this in the ISR.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
32	Bishop Creek Fish Distribution Technical Memo	May 21, 2020	CDFW	Page 21. The discussion should define what the authors mean by 'healthy.' This conclusion is said to be based upon individual fish size and condition, age class distribution, and fish density. We offer the alternative interpretation that small average size and a notable absence of older age classes indicates an impaired condition.	SCE notes CDFW's observation and will address this in the ISR
33	Water Quality Technical Memo	May 21, 2020	CDFW	In Section 5.2, CDFW recommends identifying the range of minimum as well as maximum possible depths in this section, as well as use of consistent units of depth (feet or meters) in future reports.	The Water Quality Study report will provide the total depth of the lake at the monitoring point at the time of sampling in both feet and meters.
34	Water Quality Technical Memo	May 21, 2020	CDFW	Section 6.1.1 indicates vertical profiles will be taken at 1-meter increments. To better understand the strength and stability of potential thermal stratification, CDFW recommends adding an additional vertical station at the spacing of 0.5 m wherever the temperature difference between two vertical stations is equal to or greater than 2°C.	<p>SCE does not believe that the additional granularity is warranted for the vertical dissolved oxygen and water temperature profiles planned at South Lake and Lake Sabrina. See note in Section 6.1.1 of the WQ Implementation Plan where thermocline is defined as greater than 1 degree centigrade per meter with depth.</p> <p>The Study Plan as well as the Water Quality Implementation Plan were previously distributed to the TWG for comment (most recently on Feb 14, 2020). The INF and the SWRCB both provided comments which were addressed; at this point, the methods and level of effort have been established. As provided for in the ILP process, the TWG can discuss whether a change of methods is warranted during Study Report meeting scheduled for fall of 2020.</p>

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
35	Sediment and Geomorphology Technical Memo	May 21, 2020	CDFW	The Technical Memo states that an assessment of LWM was completed in July and September of 2019 but no results were included in the Technical Memo. The Technical Memo should include estimates of instream LWM, discuss historical removal practices, and discuss the feasibility of passing LWM over or around the intake dams, to reduce impact to this component of fish habitat.	The technical reports, provided as a supplement to the progress reports, are interim work-products intended to summarize work to date and help the team prepare for additional field work and were not intended to be full "Study Reports". SCE will include additional information regarding findings relative with LWM in the ISR. As provided for in the ILP process, the TWG can discuss additional information is needed during Study Report meeting scheduled for fall of 2020.
36	Sediment and Geomorphology Technical Memo	May 21, 2020	CDFW	The Technical Memo states that an assessment of LWM was completed in July and September of 2019 but no results were included.	The technical reports, provided as a supplement to the progress reports, are interim work-products intended to summarize work to date and help the team prepare for additional field work and were not intended to be full "Study Reports. SCE will include additional information regarding findings relative with LWM in the ISR. As provided for in the ILP process, the TWG can discuss additional information is needed during Study Report meeting scheduled for fall of 2020.
37	Sediment and Geomorphology Technical Memo	May 21, 2020	CDFW	This goal/objective was not addressed in the Technical Study Plan but should be addressed after 2020 surveys. [Referring to <i>Evaluate how operations (flow release timing, magnitude, and duration) could be modified to provide sediment transport flows.</i>]	SCE notes CDFW's observation and will address this in the ISR.
38	Sediment and Geomorphology Technical Memo	May 21, 2020	CDFW	This goal/objective was not addressed in the Technical Study Plan but should be addressed after 2020 surveys. [Referring to <i>Understand potential sediment inputs and impacts from higher flows to reaches below Plant 6 from proposed changes in flow/operations.</i>]	SCE notes CDFW's observation and will address this in the ISR.

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
39	General	May 21, 2020	CDFW	CDFW request that SCE consider our comments and recommendations by either amending the existing Appendices or incorporating our comments into the anticipated future reports.	SCE appreciates the time the CDFW took to make thoughtful comments on the technical memoranda and agrees that most comments provided will can be appropriately addressed in the ISR. To the extent there are comments that bear on execution of 2020 field work, SCE will expedite those discussions.
40	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 12, 2020	INF	When the term “historically dry” is used to describe certain stream reaches, does this mean dry since project construction? Or dry even since prior to project construction?	The term refers to stream reaches that did not have perennial flow prior to minimum instream flow releases that began in 1994 per requirements of the existing license.
41	Vegetation Guild Analysis Technical Memo (Riparian Communities)	May 12, 2020	INF	Include a more detailed investigation/discussion of black cottonwood condition and trend.	Comment noted; this will be addressed in the ISR
42	Invasive Plant and RTE Plant Plans	May 12, 2020	INF	Study Area in both plans includes recreation sites- when will these be surveyed?	These studies were completed the week of June 15, 2020.
43	Invasive Plant and RTE Plant Plans	May 12, 2020	INF	Invasive Study Area: Surveys are needed upstream from Plant 4 for Robinia to effectively plan management and control measures.	This will be done in completed in July, 2020
44	Invasive Plant and RTE Plant Plans	May 12, 2020	INF	<i>Lepidium appelianum</i> (hairy whitetop) is listed by Cal-IPC as <i>Limited</i> .	Comment noted; the Team will review the current Cal-IPC database and addressed status in the ISR
45	Invasive Plant and RTE Plant Plans	May 12, 2020	INF	Follow up with surveyors to verify that whitebark pine was targeted during project surveys (ESA candidate with proposed ruling expected Fall 2020).	Comment noted; this will be addressed in the ISR

Comment Number	Study	Date of Comment	Entity	Comments	SCE Response- to be confirmed
46	Invasive Plant and RTE Plant Plans	May 12, 2020	INF	Submit copies of GIS data for invasive and special status species to INF Botanist, as well as photos of species, populations, sites.	SCE will provide these data as requested.

Document Content(s)

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