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**LIST OF ACRONYMS**


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CFR	Code of Federal Regulations
FERC	Federal Energy Regulatory Commission
ILP	Integrated Licensing Process
NGO	Non-governmental organizations
NOI	Notification of Intent
PAD	Pre-Application Document
Project or Proposed Project	Rush Creek Project
SCE	Southern California Edison Company

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## **1.0 INTRODUCTION**

### **1.1 BACKGROUND**

Southern California Edison Company (SCE) is the licensee, owner, and operator of the Rush Creek Project (Project or Proposed Project) (Federal Energy Regulatory Commission [FERC] Project No. 1389). SCE currently operates the Project under a 30-year license issued by FERC on February 4, 1997.<sup>1</sup> The current license expires on January 31, 2027.

SCE is seeking renewal of its license to continue operation and maintenance of a modified Project. In support of preparing an application for a new license, SCE has elected to use the Integrated Licensing Process (ILP), as defined in 18 Code of Federal Regulations (CFR) Part 5. To formally initiate the relicensing process, FERC requires the licensee to file a Notification of Intent (NOI) to seek a license and a Pre-Application Document (PAD), a minimum of 5 years prior to the expiration of the current license. In accordance with the regulations, SCE will file the PAD and associated NOI with FERC prior to the regulatory deadline of January 31, 2022, and distribute it to federal and state resource agencies, local governments, Native American Tribes, non-governmental organizations (NGOs), and other interested parties.

### **1.2 PROJECT LOCATION**

The Project is located on Rush Creek on the eastern slope of the Sierra Nevada in Mono County, California. The Project is situated approximately 4 miles southwest of the unincorporated community of June Lake and approximately 14 miles upstream from Mono Lake (Map 1-1).

The area around the Rush Creek Powerhouse is located on SCE-owned lands. However, the majority of the Project facilities occupy federal lands within the Inyo National Forest, which is under the jurisdiction of the United States Forest Service. A portion of the Project (Rush Meadows Dam, Waugh Lake, Gem Lake, and the upstream side of Gem Dam) is located within the Ansel Adams Wilderness Area.<sup>2</sup>

Northeast of Agnew Dam, a 135-foot-long section of the 4-kilovolt power line, which connects Rush Creek Powerhouse to Agnew Dam, crosses the Owens River Headwaters Wilderness Area;<sup>3</sup> however, no poles/towers are located within the wilderness area.

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<sup>1</sup> The Federal Power Commission, FERC's predecessor agency, issued the original license for the Project in 1939.

<sup>2</sup> Construction of the Project was completed in the early 1900s, before Congress' establishment of the Ansel Adams Wilderness Area. Ansel Adams Wilderness Area was originally established by Congress as part of the original Wilderness Act in 1964. At that time, it was designated as the Minarets Wilderness. In 1984, after Ansel Adams' death, the area was renamed in his memory.

<sup>3</sup> The Owens River Headwaters Wilderness Area was designated by Congress on March 31, 2009.

### **1.3 OVERVIEW OF EXISTING PROJECT**

The 13.01-megawatt Project includes three dams and associated reservoirs – Rush Meadows Dam (Waugh Lake), Gem Dam (Gem Lake), and Agnew Dam (Agnew Lake); a water conveyance system; the Rush Creek Powerhouse; and ancillary facilities. Rush Meadows Dam was completed in 1918, and subsequently raised in 1924 and 1925. Original construction of Gem Dam was completed between 1915 and 1917, and an additional gravity section was added in 1924. Construction of Agnew Dam was completed between 1915 and 1917.

The three Project reservoirs historically provided storage for lake recreation during the summer and allowed for electricity generation at the Rush Creek Powerhouse in the fall/winter. Water exiting the powerhouse enters a short tailrace and is returned to Rush Creek upstream of Silver Lake.

Recently, SCE conducted fault studies, structural testing, and engineering analyses of Agnew, Gem, and Rush Meadows dams as a consequence of the Silver Lake Fault being identified as a potential safety concern in 2007. As a result of the analyses and subsequent consultation with FERC's Division of Dam Safety and Inspections and the California Department of Water Resources' Division of Safety of Dams, SCE requested and obtained approval to implement storage restrictions at the three reservoirs beginning in 2012 and structural modifications at Agnew and Rush Meadows dams in 2017 and 2018 and Gem Dam in 2020 and 2021.

Refer to Section 2.0 for additional details on the existing Project location, facilities, operation, and maintenance activities.

### **1.4 OVERVIEW OF PROPOSED PROJECT MODIFICATIONS**

Proposed Project modifications currently under consideration in the Rush Creek relicensing include the following:

- Either partially or fully removing Agnew and Rush Meadows dams; and
- Retrofitting Gem Dam for the continued operation of the Project for power generation.

Two Proposed Project alternatives have been identified to bookend the analysis for disposition of Rush Meadows Dam and Agnew Dam, namely:

- Full dam removal
- Partial dam removal

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

One Proposed Project alternative is under consideration at Gem Dam, namely:

- Retrofitting the dam to meet seismic restrictions under a probable maximum flood event with a new spillway and reduced dam height.

Under this alternative, hydroelectric operations at Gem Dam and Rush Creek Powerhouse would continue under FERC jurisdiction consistent with conditions identified in a new FERC license. The alternatives were developed at a conceptual engineering level of design with structural modeling completed for the Gem Dam retrofitting. During the relicensing proceeding, other alternatives for Project disposition could be identified and may warrant further analysis in the Application for New License.

Refer to Section 3.0 for additional details on Proposed Project modifications and alternatives under consideration.

## 1.5 PURPOSE OF THE PAD

The PAD was prepared in compliance with 18 CFR Part 5, which defines the form and content requirements of the document. The purpose of the PAD is to provide FERC, federal and state resource agencies, local governments, Native American Tribes, NGOs, and other interested parties with existing, relevant, and reasonably available information related to Project facilities and engineering, operational, economic, and environmental aspects of the Project. The PAD also identifies pertinent Project issues and potential study needs.

## 1.6 PAD ORGANIZATION

The information contained in this document was assembled based on the requirements set forth in 18 CFR § 5.6 (c) and (d) and is organized as follows:

Section	Description	FERC Regulation
1.0	Introduction to the Project and document organization	–
2.0	Description of the Project location, facilities, operation, and maintenance	18 CFR § 5.6(d)(2)
3.0	Description of Proposed Project modifications	18 CFR § 5.6(d)(2)
4.0	Description of the existing environment and resource impacts, including reference to literature and information sources cited for each resource area	18 CFR § 5.6(d)(3) 18 CFR § 5.6(c)(2)
5.0	Identification of preliminary resource issues, potential studies, and relevant comprehensive plans and resource management plans	18 CFR § 5.6(d)(4)
6.0	Summary of contacts	18 CFR § 5.6(d)(5)
Appendix A	Process Plan and Schedule	18 CFR § 5.6(d)(1)
Appendix B	Summary of Contacts (additional details)	18 CFR § 5.6(d)(5)
Appendix C	Draft Technical Study Plans	18 CFR § 5.6(d)(4)

## **1.7 PROCESS PLAN AND SCHEDULE**

Pursuant to 18 CFR § 5.6(d)(1), SCE developed a Process Plan and Schedule (Appendix A) that summarizes the approach for relicensing the Project and includes Communication and Participation Protocols for stakeholder participation.

Specifically, the Process Plan and Schedule describe pre-application activities, incorporating the time frames for pre-filing consultation and information gathering; FERC scoping; study plan development, study execution, and reporting; filing of the License Application; and FERC application processing. SCE's proposed schedule (Appendix A, Table 1) provides each of the major ILP relicensing activities, associated CFR reference, responsible party, and deadline for implementation of the activity.

The Communication and Participation Protocols (Appendix A, Attachment 1) provide guidelines for participation in the relicensing process by interested parties, including federal and state resource agencies, local governments, Native American Tribes, NGOs, and other interested parties.

## **1.8 EARLY RELICENSING ACTIVITIES**

On March 11, 2021, SCE distributed an announcement notifying federal and state resource agencies, local governments, Native American Tribes, NGOs, and other interested parties of the upcoming relicensing for the Project. In preparation of this PAD, SCE conducted searches of publicly available databases and its own records. On March 15, 2021, SCE broadly distributed a comprehensive questionnaire to stakeholders designed specifically to identify existing, relevant, and reasonably available information related to the Project and solicit information related to resource issues and local community concerns. On October 19, 2021, SCE conducted two relicensing kick-off webinars (afternoon and evening) to discuss the upcoming relicensing process. The two webinars had identical agendas, but were provided during both the day and evening to offer greater opportunity for participation by federal and state resource agencies, local governments, Native American Tribes, NGOs, and other interested parties. The purpose of the webinars was to acquaint interested parties with FERC's ILP, including key milestones and opportunities for stakeholder participation. SCE also provided an overview of the existing Project; the Proposed Project under consideration in the relicensing proceeding; and the PAD. Refer to Section 6 and Appendix B for a summary of early relicensing activities and contacts made in connection with preparing the PAD.

## **1.9 DRAFT TECHNICAL STUDY PLANS**

Based on existing Project operation and maintenance activities (Section 2.0); Proposed Project alternatives (Section 3.0); summary of existing information (Section 4.0); discussion with SCE personnel familiar with operation and maintenance of the Project; and responses to the Project Information Questionnaire (Appendix B), SCE developed the following 15 Draft Technical Study Plans for consideration in the relicensing proceeding. The overall objective of the Draft Technical Study Plans is to address data gaps in existing information

such that sufficient information is available to evaluate potential Project impacts and collaborate on the Proposed Project included in the License Application.

The Draft Technical Study Plans are organized into five major resource areas – Aquatic, Cultural, Land, Recreation, and Terrestrial. Refer to Appendix C for Draft Technical Study Plans for the Project.

<b>Aquatic Resources</b>
AQ 1 – Instream Flow AQ 2 – Hydrology AQ 3 – Water Temperature AQ 4 – Water Quality AQ 5 – Geomorphology AQ 6 – Fish Population and Barriers AQ 7 – Special-status Amphibians
<b>Cultural Resources</b>
CUL 1 – Built Environment CUL 2 – Archaeology CUL 3 – Tribal
<b>Land Resources</b>
LAND 1 – Aesthetics LAND 2 – Noise
<b>Recreation Resources</b>
REC 1 – Recreation
<b>Terrestrial Resources</b>
TERR 1 – Botanical TERR 2 – Wildlife

### 1.10 FERC SCOPING MEETING AND SITE VISIT

Pursuant to 18 CFR § 5.8(b)(3)(viii), FERC will convene a scoping meeting and site visit<sup>4</sup> within 30 days of the issuance of its Notice of Commencement of Proceeding and Scoping Document. Typically, FERC conducts two scoping meetings with one meeting held during the day to focus on the solicitation of comments and information from resource agencies and Tribes, and the second meeting held in the evening to facilitate participation from the public and NGOs. The scoping meetings are anticipated to be held in March/April 2022. FERC will provide a public notice of both the scoping meeting and the site visit. All interested stakeholders are invited to participate in the scoping meeting and site visit.

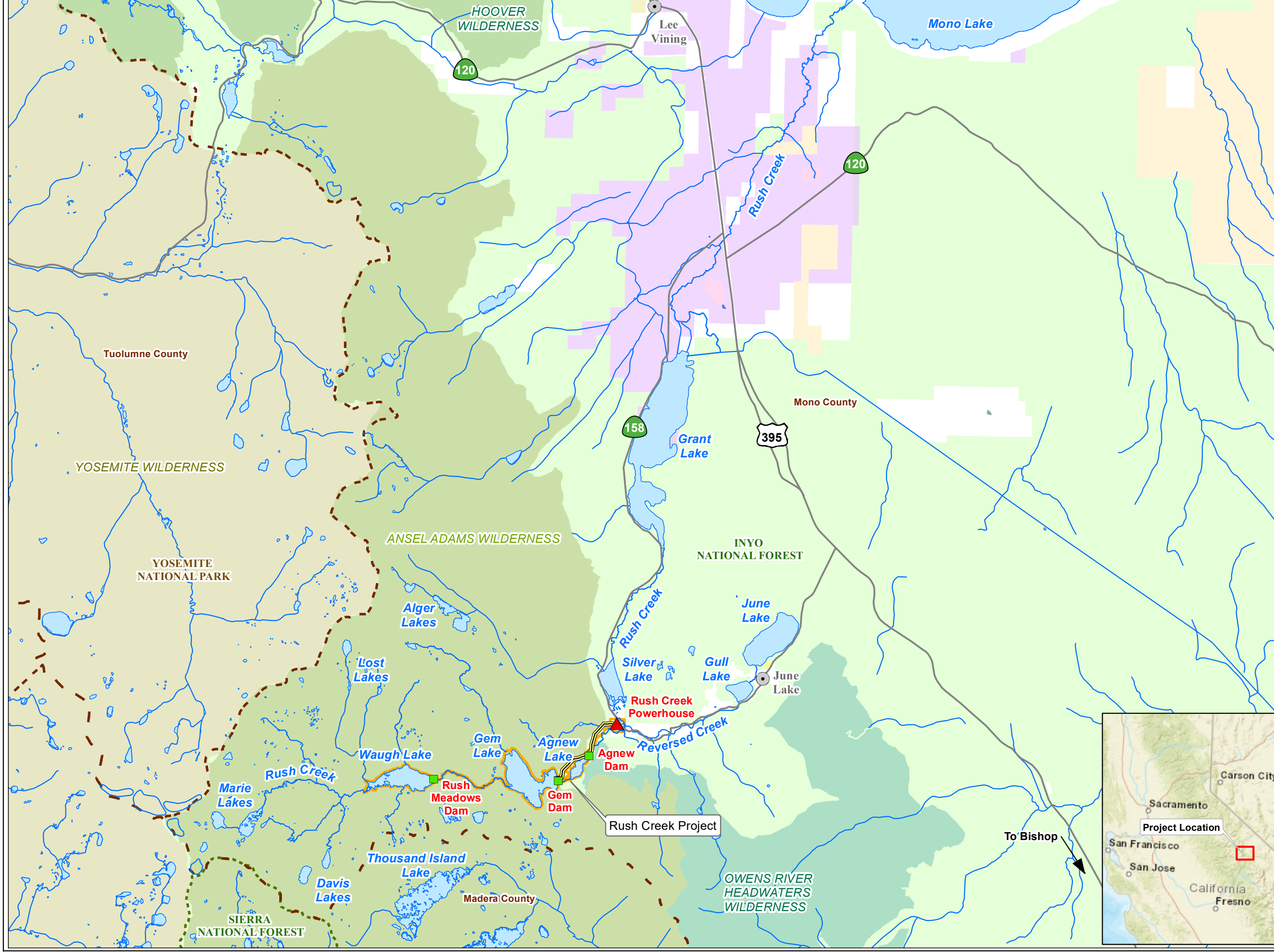
<sup>4</sup> Recently, as a result of the pandemic, FERC has elected to conduct virtual scoping for hydropower relicensing projects.

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# MAPS

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**SCE Facilities**

- Dam
- ▲ Powerhouse
- Flowline / Penstock
- FERC Boundary

**Other Features**

- Major City/Town
- Highway
- River/Stream
- Lake
- County Boundary

**Land Jurisdiction and National Wilderness Areas/Parks\***

- Local Government
- LADWP
- State Government
- Bureau of Land Management
- U.S. Forest Service
- Ansel Adams Wilderness (U.S. Forest Service)
- Hoover Wilderness (U.S. Forest Service)
- Owens River Headwaters Wilderness (U.S. Forest Service)
- Yosemite National Park / Yosemite Wilderness (National Park Service)
- Private (Blank)

\*SOURCES: BLM, 2020.  
Mono Co., 2019.  
Wilderness.net, 2019.



**SOUTHERN CALIFORNIA EDISON**  
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Rush Creek Project (FERC 1389)

**Map 1-1**

**Project Vicinity and Land Jurisdictions**

Date: 7/7/2021  
Projection: UTM Zone 11  
Datum: NAD 83

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