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## State Water Resources Control Board

November 13, 2023

Mr. Wayne Allen  
Southern California Edison Company  
1515 Walnut Grove Avenue  
Rosemead, CA 91770  
Sent via email: [Wayne.Allen@sce.com](mailto:Wayne.Allen@sce.com)

**Lee Vining Hydroelectric Project**  
**Federal Energy Regulatory Commission Project No. 1388**  
**Mono County**  
**Lee Vining Creek, Glacier Creek, Ellery Lake, Tioga Lake, and Saddlebag Lake**

### **COMMENTS ON THE DRAFT TECHNICAL REPORTS OF 2022 SURVEY FINDINGS FOR THE LEE VINING HYDROELECTRIC PROJECT**

Dear Mr. Wayne Allen:

Southern California Edison Company (SCE) owns and operates the Lee Vining Hydroelectric Project (Project) that is located on the eastern slope of the Sierra Nevada, approximately 9 miles upstream from Mono Lake in Mono County. The Project currently operates under a 30-year Federal Energy Regulatory Commission (FERC) license that expires on January 31, 2027. As part of Project relicensing, on September 14, 2023, SCE provided four draft technical reports that document 2022 survey results for stakeholders comment and review. The draft technical reports included results for the following studies: (1) Reservoir Fish Population Study; (2) Stream Fish Populations Study; (3) Year 1 Stream and Reservoir Water Quality Study, and (4) General Botanical Resources Survey. State Water Board staff have reviewed the draft technical reports and is submitting the enclosed comments pertaining to the Stream and Reservoir Water Quality Study in Attachment A: *Comments on 2022 Stream and Reservoir Water Quality Study for Lee Vining Hydroelectric Project*.

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

If you have questions regarding this letter, please contact Bryan Muro, Project Manager, by email at [Bryan.Muro@waterboards.ca.gov](mailto:Bryan.Muro@waterboards.ca.gov). Written correspondence should be directed to:

State Water Resources Control Board  
Division of Water Rights  
Water Quality Certification Program  
Attn: Bryan Muro  
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Sincerely,

Bryan Muro  
Project Manager  
Water Quality Certification Program  
Division of Water Rights

Attachment: Attachment A: Comments on Stream and Reservoir Water Quality Study  
for Lee Vining Hydroelectric Project

ec: Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
**Via e-filing to FERC Project Docket**

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ATTACHMENT A: COMMENTS ON 2022 STREAM AND RESERVOIR  
WATER QUALITY STUDY FOR LEE VINING HYDROELECTRIC PROJECT

State Water Resources Control Board (State Water Board) staff are providing the following comments on Southern California Edison Company's (SCE) *Stream and Reservoir Water Quality Study for the Lee Vining Hydroelectric Project*:

1. Reference errors are present in the *Stream and Reservoir Water Quality Study for the Lee Vining Hydroelectric Project* (i.e., under Section 4.1.2 Stream Water Quality). Please resolve these issues prior to the finalizing the study report.
2. Saddlebag and Tioga lakes pH data collected in 2022 recorded minimum summer pH values of 5.1 and 5.5, respectively. By contrast, summer pH values reported at site LV-1 (Lee Vining Creek Inflow to Saddlebag Lake) and site LV-10 (Glacier Creek Inflow to Tioga Lake) were 8.7 and 8.3, respectively.

The Water Quality Control Plan for the Lahontan Region (Basin Plan) pH objective states that: "In fresh waters with designated beneficial uses of COLD<sup>1</sup> or WARM<sup>2</sup>, changes in normal ambient pH levels shall not exceed 0.5 pH units." Lee Vining Creek upstream of the Los Angeles Department of Water and Power (LADWP) diversion includes COLD as a beneficial use. Data collected in 2023 will help inform to what extent low pH values recorded in Saddlebag and Tioga lakes are an ongoing condition, and how protection, mitigation, and enhancement (PM&E) measures could be applied, to address low pH values.

3. Dissolved oxygen concentrations collected in the bottom six meters of both Saddlebag and Tioga lakes were less than 80 percent saturation in fall 2022. In Tioga Lake, dissolved oxygen reached a minimum of 32 percent (2.7 milligrams per liter [mg/L]) in summer, and a minimum of 0 percent (0 mg/L) in fall.

The Basin Plan objective for dissolved oxygen states: "The dissolved oxygen concentration, as percent saturation, shall not be depressed by more than 10 percent, nor shall the minimum dissolved oxygen concentration be less than 80 percent saturation." The Basin Plan further states for waters with beneficial uses of COLD with SPWN<sup>3</sup> (such as Lee Vining Creek), the following additional criteria are applicable:

- a 7 Day Mean concentration of 9.5 mg/L, and
- a 1 Day Minimum of 8.0 mg/L.

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<sup>1</sup> Cold Freshwater Habitat is defined as beneficial uses of waters that support cold water ecosystems, including, but not limited to, preservation and enhancement of aquatic habitats, vegetation, fish, and wildlife, including invertebrates.

<sup>2</sup> Warm Freshwater Habitat is defined as beneficial uses of water that support warm water ecosystems including, but not limited to, preservation and enhancement of aquatic habitats, vegetation, fish, and wildlife, including invertebrates.

<sup>3</sup> Spawning, Reproduction, and Development is defined as beneficial uses of water that support high quality aquatic habitat necessary for reproduction and early development of fish and wildlife.

To better inform potential PM&E measures, SCE should consider collecting additional dissolved oxygen data to determine the spatial extent within Tioga and Saddlebag lakes where low dissolved oxygen values are occurring, and if Tioga and Saddlebag lakes are providing adequate water quality to support designated beneficial uses.

4. Fecal coliform bacteria data collected in 2022 ranged from 49 to 540 most probable number per 100 milliliters (MPN/100 mL) on a single sampling date. The Basin Plan objective for fecal coliform states that “The fecal coliform concentration during any 30-day period shall not exceed a log mean of 20/100 mL, nor shall more than 10 percent of all samples collected during any 30-day period exceed 40/100mL.” Data collected in 2023 will help inform under what conditions and how often these values occur and may also inform PM&Es associated with Project recreational activities.
5. State Water Board staff look forward to reviewing and discussing the hydro-resource optimization event turbidity monitoring data as it becomes available. We recommend including the data in .xlsx or .csv format for simplified sharing and review by interested stakeholders.