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United States
Department of
Agriculture

Forest
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SIERRA
NATIONAL
FOREST

1600 TOLLHOUSE ROAD
CLOVIS, CA 93611-0532
559 297-0706
FAX 559 294-4809
TTY 559 322-0425

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FEDERAL ENERGY
REGULATORY
COMMISSION

File Code: 2770

Date: October 6, 1999

Mr. David Boegers, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington DC 20426

FERC Project Nos. 67, 120, 2017, 2085, 2086, 2174, 2175

Dear Mr. Boegers:

I am writing concerning the recent relicensing activities associated with Southern California Edison's (SCE) hydropower projects known as the Big Creek System located on the San Joaquin River within the Sierra National Forest in California. The expiration dates for these projects range from 1998 to 2009. SCE has filed Notices of Intent for Projects 2017 (Big Creek No. 4) and 2086 (Vermilion Valley). As we approach relicensing these seven projects, it is an appropriate time to review this effort relative to the necessary planning and basin wide impacts that occur from all of these projects.

Individual project licenses for the Big Creek system were necessary to accommodate the construction phases of this project. Although these projects were licensed separately, these projects are interdependent and lay intertwined on the forest landscape. Information about the interconnection between the projects requested by the FERC in an Additional Information Request (AIR) filed for the Big Creek No. 4 project relicensing. As a result of that AIR, FERC staff participated in a meeting held at Big Creek on June 29, 1999, where SCE explained their project operations of the Big Creek System. It was evident from the information presented, that the operation of projects located lower in the watershed depend on flows from upstream projects. Upon review of the license boundary maps it is noticeable that many project features are located immediately adjacent to features of another license and in some cases the same land is included within the boundaries of two different licenses.

It is clear that these seven licensed projects are connected actions as defined by the National Environmental Policy Act Regulations. Actions are connected if they are interdependent parts of a larger action and depend on larger action for their justification (40CFR 1508.25). These circumstances would suggest that the operations and impacts of these projects should be reviewed in total to accurately assess the project for the next thirty to fifty years. To proceed with relicensing these projects separately would not reflect how these projects currently operate and ignores their basin wide footprint.

SCE has proposed using an Alternative Licensing Process to relicense their Big Creek projects. The Forest Service supports using this approach and appreciates SCE's efforts in this direction. In order to achieve success with this project, consideration should be given to the timeline that

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