

Additional Information Request No. 6 (Schedule B)

The Commission's Additional Information Request No. 6 stated:

"6. Detailed Descriptions of Existing Wildlife Habitat Protection and Enhancement Measures (response due within 90 days)

On page 3-32 and in table 7.0-2 of the PDEA, you indicate that you would continue to implement the Endangered Species Alert Program, and on page 3-39 and in table 7.0.2 you indicate that you would implement the newly developed Northern Hydro Special-Status Species Information Program and the Environmental Compliance Program at the Mammoth Pool Project. Although these pages provide very brief descriptions of the programs, details of these programs are not provided in the license application. So that we can assess the appropriateness of the continued implementation of these environmental measures, please provide the applicable sections of the documents associated with both programs as they would apply specifically to the Mammoth Pool Project, along with their intended habitat goals. For example, providing us with the sections of your existing Endangered Species Alert Program manual that describe the overall goals of this program and current species profiles that apply specifically to this project would satisfy our request as it applies to your proposed continuation of this program."

SCE Response to Additional Information Request No. 6 (Schedule B):

Provided below is additional information requested regarding SCE's environmental compliance and training programs intended to protect existing wildlife habitat.

Environmental Training and Compliance Overview:

Southern California Edison Company (SCE) proposes to continue conducting employee environmental training on an annual basis. Training sessions are conducted by biologists from SCE's Health, Safety and Environment Division and/or Environmental Compliance Department, generally in the spring. During the training sessions, employees are introduced to the SCE Environmental Compliance Process, which provides a standardized procedure to ensure compliance with environmental regulations and to include appropriate avoidance and protection measures for work conducted in the vicinity of SCE's Northern Hydroelectric System projects, including the Mammoth Pool Project (FERC Project No. 2085). Employees are also introduced to materials and expert contacts available to them for identifying special-status species or cultural resources that may occur in the Project vicinity via the recently developed Northern Hydro Special-status Species Information (NHSSIP) and the existing corporate-wide Endangered Species Alert (ESAP) programs. Additionally, employees are trained in the specific avoidance and protection measures that must be implemented to protect special-status species in the Project vicinity, including Valley Elderberry Longhorn

Beetle (VELB), special-status raptors, and cultural sites, and who to contact if unsure about requirements or procedures.

Below are detailed descriptions of the Northern Hydro Environmental Compliance Process, the NHSSIP and ESAP programs.

Environmental Compliance Process

The Environmental Compliance Process is a comprehensive process that will coordinate:

- A customized Geographic Information System (GIS) program containing periodically updated information on the location and occurrence of special-status biological species and cultural resources in relationship to Mammoth Pool Project facilities;
- Pertinent avoidance and protection measures as well as other conditions as dictated by the Federal Energy Regulatory Commission (FERC) license (e.g., Forest Service 4(e) Conditions); and
- Employee-generated work requests.

Work requests prepared and submitted to the Environmental Compliance Department (ECD) by SCE Project planners will be analyzed via the compliance process. Figure AIR 6-1 presents a flow chart depicting the steps in the Environmental Compliance Process. Using the customized GIS program containing known locations of special-status species and cultural resources, the ECD evaluates the work order request, a printout of special-status species or cultural sites that are known to occur in the vicinity of the work area, and a list of all applicable avoidance and protection measures to be implemented. For example, if a planner submits a work request to conduct vegetation management activities at Mammoth Pool Project facilities, the output from the compliance process analysis would provide information regarding the occurrence of any special-status species and/or cultural sites and identify appropriate avoidance and protection measures that would need to be implemented prior to and concurrent with conducting the work activity. The planner would also be advised whether any additional environmental permitting or training for staff is required prior to conducting the work activity. Upon completion of the work activity, the planner documents all work was conducted according to avoidance and protection measures or other applicable regulations.

The Northern Hydro Special-status Species Information Program (NHSSIP)

The Northern Hydro Special-status Species Information Program manual was developed to provide employees with information on Federal and state threatened and endangered species, and Sierra National Forest Sensitive (FSS) and Sierra National Forest Management Indicator Species (SNF MIS) that are

known to occur or have the potential to occur in the vicinity of the Northern Hydroelectric System. The manual is intended to be used as a reference tool for employees and planners to familiarize themselves with these species and used in conjunction with the Environmental Compliance Process, described above. A copy of the NHSSIP is provided in Appendix AIR 6-A.

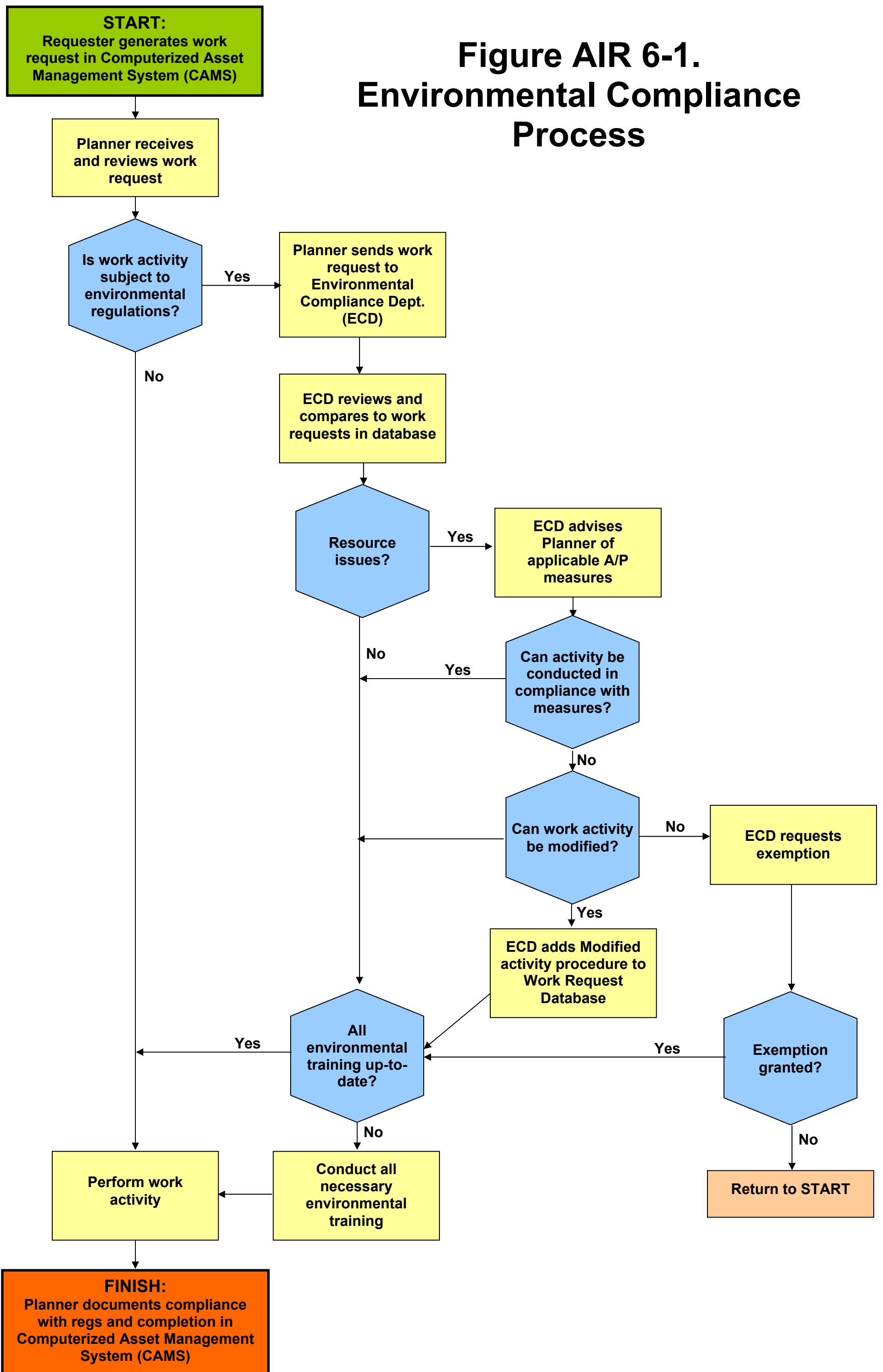
The Endangered Species Alert Program (ESAP)

The ESAP was developed to educate field personnel about threatened and endangered plant and animal species that are known to occur or are likely to occur within the vicinity of SCE's Projects corporate-wide, including the Mammoth Pool Project. The centerpiece of this program is the ESAP manual, which is intended to serve both as an introduction to special-status species that may be encountered in the field, and as a document to direct planners to contact SCE biologists for assistance in determining whether or not a proposed work activity would potentially disturb sensitive plants or animals. Figures at the beginning of the manual provide general summaries of sensitive wildlife and plant species distributions by major geographic regions. The text of the manual provides specific life-history and geographical range information for each species referenced. If special-status species are shown as likely to occur in an area where ground-disturbing or other potentially disruptive activities (e.g., tree-trimming) are to occur, planners are instructed to contact SCE biologists who can determine what avoidance and protection measures or other actions are necessary to protect the species in question. A copy of the ESAP manual is provided in Appendix AIR 6-B.

SCE's goal is to consistently use these programs to provide appropriate protection to special-status species and cultural sites in the Mammoth Pool Project vicinity by: 1) creating awareness of the special-status species and cultural sites, and of the avoidance and protection measures associated with them; and 2) ensuring that all avoidance and protection measures and other regulations are implemented when work activities are conducted in the Project vicinity.

FIGURE

Figure AIR 6-1. Environmental Compliance Process



APPENDIX AIR-6-A
Northern Hydro Division
Special-Status Species Information Program (NHSSIP)

APPENDIX AIR-6-B
Endangered Species Alert Program Manual (ESAP)