

December 14, 2000

Mr. Wayne S. White
Field Supervisor
Fish and Wildlife Service
2800 Cottage Way, Suite W-2605
Sacramento, CA 95825-1846

SUBJECT: Request for Active Participation by the USFWS Energy and Endangered Species Divisions in the Big Creek System Alternative Licensing Process (FERC Project No's. 67, 120, 2175, and 2085)

Dear Mr. White:

As we have discussed previously, Southern California Edison (SCE) is conducting a multi-year collaborative process using the Federal Energy Regulatory Commission's (FERC) Alternative Licensing Process (ALP) for relicensing four of its seven Big Creek hydroelectric projects located in California's upper San Joaquin River watershed, about 25 miles northeast of the City of Fresno (Table 1). The seven Big Creek hydroelectric projects (combined dependable operating capacity of about 1,000 megawatts) are referred to as the Big Creek System and encompass an area of approximately 800 square miles. SCE recognizes that the common ownership and location of the seven hydroelectric projects within one watershed provides a unique opportunity to address complex resource balancing issues within a single process. Therefore, SCE has committed to analyzing all seven hydroelectric licenses during the Basin planning process for the Big Creek System ALP. A significant factor in SCE's decision to adopt this relicensing approach was the strong endorsement of a basin-wide approach by interested stakeholders, including the Fish and Wildlife Service (Service).

The Big Creek ALP, since its initiation in March 2000, has had active and consistent participation with a diverse group of stakeholders including representatives from state and federal agencies, Native American tribes, local and regional authorities, environmental organizations, local community and quasi-government organizations, and business communities (Table 2). Ms. Erin Sauls of the Service's Energy and Instream Flow Division participated until August of this year.

However, since Ms. Sauls left the Service, no other Energy and Instream Flow Division representative has participated in the collaborative process. This absence is a significant concern to all collaborative participants. Another concern is the lack of participation by anyone from the Service's Endangered Species Division. The participation of both divisions is essential at this phase of the collaborative process, as we are currently developing study objectives and methodologies for the upcoming field season (May 2001).

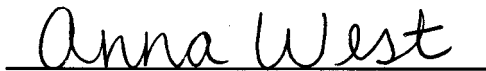
Without the timely participation of the Energy and Endangered Species Divisions, we cannot be sure if the study plans will satisfy the Service with respect to PM&E measures and ESA issues. An overall goal of the collaborative process and relicensing is to reach a settlement among all parties regarding PM&E issues and license conditions. Approximately 40 stakeholders have invested, and intend to continue investing significant time and energy to this collaborative process. The collaborative group recognizes that active participation now will eliminate the potential for future disagreements regarding the information that is needed to reach a licensing decision. No one wants to go through a time consuming and costly licensing process only to find out that important data was not obtained up front. Without the active participation of the Service at this time, that goal may be jeopardized.

The Big Creek Collaborative Group, therefore, requests that the Service make sufficient personnel and resources available to ensure the active participation of both the Energy and Endangered Species Divisions in the Big Creek ALP.

Sincerely,



T. J. McPheeters
Manager, Northern Hydro Region
and Big Creek Relicensing



Anna West
Kearns & West Facilitator

Signing on behalf of the Big Creek Collaborative Group (actively participating member organizations are listed in Table 2)

cc: David Boergers, Secretary, FERC
Jim Fargo, FERC
Mike Henry, FERC
Patricia Port, DOI
Anne Badgley, Regional Director (Pacific), USFWS
Gary Taylor, USFWS
Maria Boroja, USFWS

Table 1. Description of SCE's Big Creek Hydroelectric Projects

The four SCE Big Creek hydroelectric projects using the ALP are:

- Big Creek Nos. 1 and 2 (FERC No. 2715, license expiration 2009)
- Big Creek Nos. 2A, 8, and Eastwood (FERC No. 67, license expiration 2009)
- Big Creek No. 3 (FERC No. 120, license expiration 2009)
- Mammoth Pool (FERC No. 2085, license expiration 2007)

The three SCE Big Creek hydroelectric projects using the Traditional Relicensing Process are:

- Big Creek No. 4 (FERC No.2017, operating under an annual license)
- Vermilion Valley (FERC No. 2086, license expiration 2003)
- Portal (FERC No.2174, license expiration 2003)

Table 2: Stakeholder Organizations Actively Participating in the Big Creek ALP

American Whitewater
California Department of Fish & Game
California Sport Fishing Protection Alliance
Department of the Interior
Federal Energy Regulatory Commission (FERC)
Friant Water Users Authority
Friends of the River
Huntington Lake Association
Mono Nation
National Marine Fisheries Service
North Fork Mono Rancheria
North Fork Mono Tribe
SAMS Coalition
San Joaquin Paddlers Club
Sierra Marina
Sierra Resource Conservation District
Southern California Edison
State Water Resources Control Board
Trout Unlimited
US Bureau of Reclamation
USDA Forest Service, Sierra National Forest
US National Park Service