



August 6, 2021

Adam Barnett
Inyo National Forest
351 Pacu Ln., Suite 200
Bishop, CA, 93514

**RE: Southern California Edison's Comments on the Comprehensive River Management Plan
for the Cottonwood Wild and Scenic River**

To Adam Barnett:

Southern California Edison (SCE) appreciates the opportunity to provide comments on the Comprehensive River Management Plan (CRMP) for the Cottonwood Wild and Scenic River in Inyo County, California. SCE is the largest electric-only utility in California and one of the largest in the U.S. Our electric facilities span 50,000 square miles of SCE service area across Central, Coastal and Southern California including overlap with public lands managed by the U.S. Forest Service (Forest Service) and the Bureau of Land Management (BLM).

SCE supports the development of a CRMP that establishes programmatic management direction for Cottonwood Creek, a Wild and Scenic River (WSR) administered jointly by the Forest Service and BLM. As depicted in the attached figure, SCE has both distribution and transmission electric facilities located within the boundary of the subject Upper Owners River Project. These facilities were in existence at the date of designation of the WSR (Public Law 111-11 2009).

Subject to valid existing rights, SCE requests as part of the CRMP the ability to continue to operate, maintain, expand, and access these facilities on an as needed basis to ensure safe and reliable transmission of electricity to our customers and the region using standard industry practices, of existing utility facilities. SCE believes this request is consistent with the following management standard included in the draft management plan (page 31):

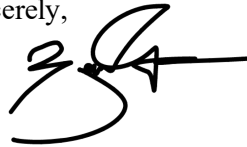
Uses of facilities in existence at the date of designation that do not conform to the river's classification may be allowed so long as the river's free-flowing condition, water quality, and outstandingly remarkable values are protected (DA-WSR-STD-06).

SCE further requests specific language be included in the CRMP for clarity and to ensure our existing rights are upheld. The language below has been included as an example:

Utility Facilities and Rights of Way. - (1) Notwithstanding any provisions herein, nothing in this CRMP shall - (i) affect the existence, use, operation, maintenance, repair, construction, reconfiguration, expansion, inspection, renewal, reconstruction, alteration, addition, relocation, improvement, funding, removal, or replacement of utility facilities or appurtenant rights of way within or adjacent to the management area; (ii) affect access to utility facilities or rights of way within or adjacent to the management area; or (iii) preclude the establishment of new utility facilities or rights of way within the management area if such facilities are necessary for public health and safety, electricity supply, telecommunications, or other utility services. (2) The [Forest Service/BLM] shall permit the use of motorized vehicles on and off roads and trails designated for use by motorized vehicles, including but not limited to the use of mechanized equipment, helicopters, and/or other aerial vehicles or devices, as necessary for the performance of activities related to the operation, maintenance, expansion, and/or construction of any utility facilities, including lines, and/or rights of way.

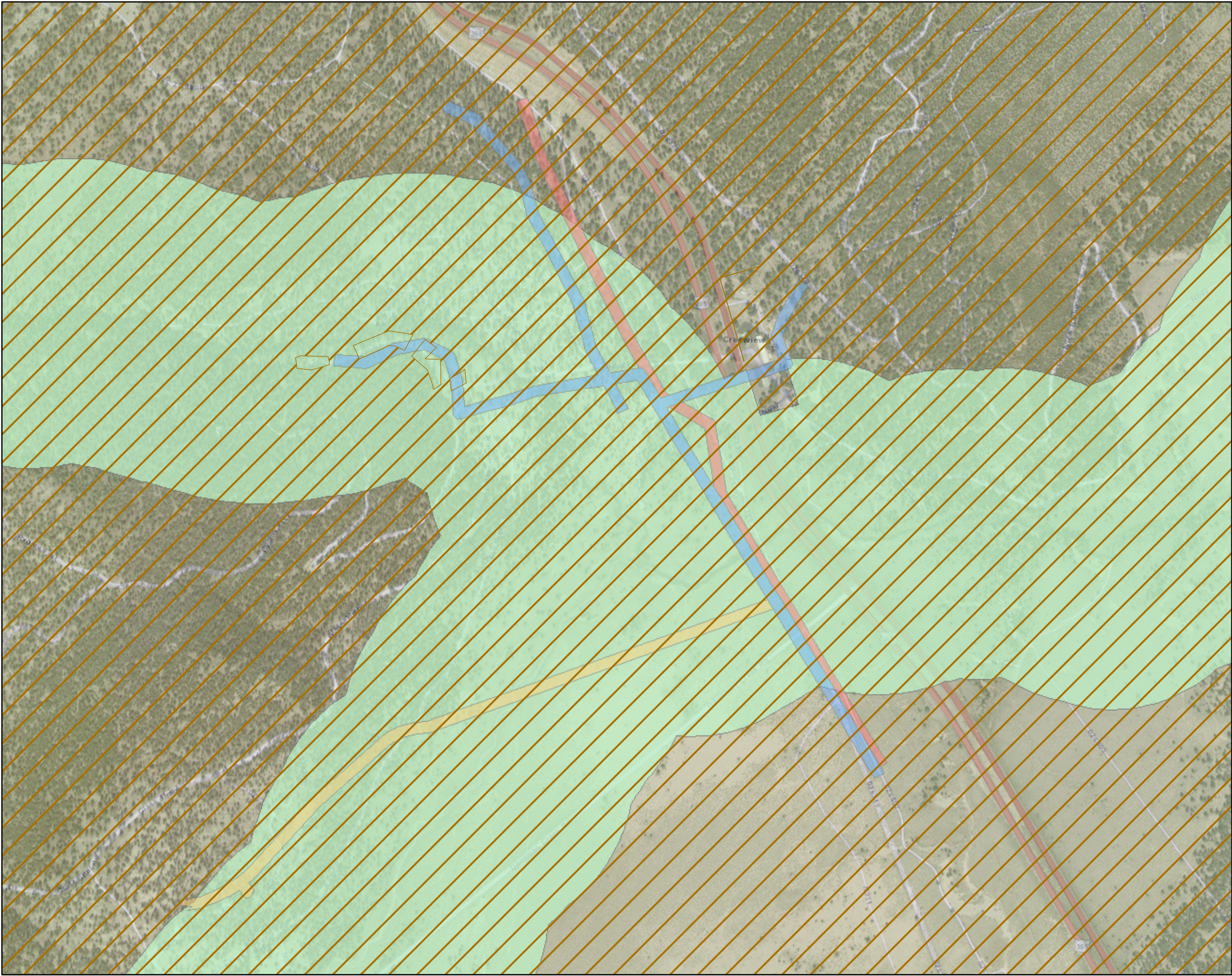
SCE appreciates the opportunity to comment on the CRMP and thanks the Forest Service and the BLM for their continued partnership in maintaining a safe and reliable electric system in California. Please contact Genevieve Cross if you have any questions or would like to discuss.

Sincerely,

A handwritten signature in black ink, appearing to be 'G. Cross', with a stylized flourish extending to the right.

Genevieve Cross
Senior Advisor Regulatory Affairs
Southern California Edison

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SCE Facilities within Upper Owens River Project

Upper Owens River Project Boundary

Overhead Transmission Corridor

Overhead Distribution Corridor

Underground Corridor

Inyo National Forest Boundary

00.050.10.2

Miles

1 in = 0 miles

Date: 7/14/2021
File Name: UpperOwensRiverProject.mxd
Version #:
Created By: Gary Talbott
Geospatial Analysis,
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