



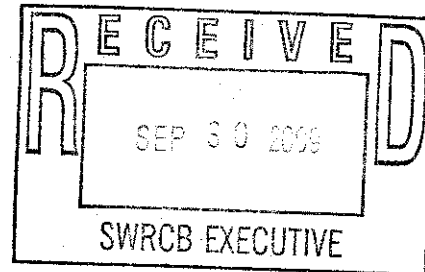
September 30, 2009

Walter D. Pagel
Manager
Eastern Hydro Division

Via Electronic Mail

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Commentletters@waterboards.ca.gov



Subject: SCE Comments for the Draft Muni/Western Decision Workshop
(Application Numbers 031165 and 031370, for Water Storage)

Dear Ms. Townsend:

Southern California Edison Company (SCE) is pleased to provide comments to the State Water Resources Control Board (Board) on the subject draft decision. SCE understands written comments must be received by noon on September 30, 2009 in order to be considered by the Board prior to the October 7, 2009 workshop. SCE believes there are no unresolved water rights issues related to the operation of SCE's Santa Ana River 1 & 3 Hydroelectric (SAR 1 & 3) Project, which is licensed by the Federal Energy Regulatory Commission as Project No. 1933. However, SCE still has concerns about access to its hydro facilities when the access road behind the Seven Oaks Dam is inundated by a water conservation pool.

In April 2007 SCE, the San Bernardino Valley Municipal Water District (Muni), and Western Municipal Water District of Riverside County (Western) entered into a Stipulation that acknowledged SCE's rights to the non-consumptive use of water by the SAR 1 & 3 Project. On May 2, 2007 SCE filed the Stipulation with the Board at a water rights hearing on the present Muni/Western application, asking the Board to include this document in any subsequent license or approval. SCE wishes only to remind the Board of this earlier SCE request.

Next, the Draft Environmental Impact Report (DEIR; 2004) for the Muni/Western project acknowledged SCE access to its hydro facilities would be curtailed when up to about two-miles of the existing, historic access road behind the Seven Oaks Dam became inundated by a water conservation pool, and as mitigation proposed a relocation of this road (to a higher elevation). However, this access road relocation was not included in the Final Environmental Impact Report (FEIR; 2007) because the environmental impact of road relocation was considered to outweigh the inconvenience to SCE in using other routes to reach hydro facilities. While SCE believes that road inundation is inappropriate, we did not challenge the FEIR. However, SCE still believes that

alternative mitigation to address the access issues should be imposed. Without the current access road, SCE will have to spend considerably more time to respond to emergencies. For example, to drive from the SCE office in the Santa Ana River Canyon just below Seven Oaks Dam, to the SAR 1 powerhouse about 4-miles up-canyon from the office, takes about 20-minutes under good conditions (one-way) on this largely unpaved road. To drive to the Mill Creek Canyon, as an alternative route, requires taking Highway 38 through the small community of Seven Oaks, and then driving unpaved mountain roads to the SAR 1 powerhouse. This will take at least an additional 70-minutes to cover the now 40-mile trip (one way).

SCE appreciates that the Board's draft decision includes Condition 17 (requiring authorization by the U.S. Forest Service prior to inundation of lands managed by that agency). However, SCE also requests the decision be amended to state the Board's decision should not be interpreted to imply that authorization of storage rights also approves any impacts due to reservoir inundation. SCE will take up the road access issue with the Forest Service, as the agency which would need to authorize the inundation of government lands.

Thank you for the opportunity to comment. Should you have any questions, please contact Dave Hildebrand at 909 307-6802.

Sincerely,

John Munn
For WDP