

**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

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February 22, 2019

Reply in Reference To: FERC010426A

Ms. Rachael Nixon
Cultural Resources Manager
Garcia and Associates
3990 Old Town Avenue, suite 105
San Diego, CA 92115

Subject: Lake Elsinore Advanced Pump Storage (LEAPS) Project (FERC No. 14227-003), Lake Elsinore, Riverside County, California

Dear Ms. Nixon:

The State Historic Preservation Officer (SHPO) received on January 22, 2019, the draft Historic Properties Management Plan (HPMP), on behalf of the Federal Energy Regulatory Commission (FERC), for the above-referenced undertaking to comply with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. § 300101), as amended, and its implementing regulation found at 36 CFR § 800. The Nevada Hydro Electric Company (TNHC), the project proponent, previously consulted with the SHPO on the LEAPS project under FERC No. 11858-002.

The LEAPS Project includes a 500-megawatt pumped storage facility, including the construction of a powerhouse, a 120-acre open reservoir, water conduits, transmission lines, and associated equipment. The project plans have been modified from FERC No. 11858-002 to include two separate primary transmission lines.

The January 22, 2019 consultation letter requested SHPO comments regarding the draft HPMP for the LEAPS project. After reviewing the consultation package, the SHPO offers the following comments:

- Previous SHPO comments by letter dated August 1, 2018 have not been addressed. In particular, FERC need to address comments regarding updated historic property identification efforts, National Register of Historic Places evaluations, assessment and resolution of effects, etc.
- The draft HPMP as written is a Historic Properties Treatment Plan in that it stipulates how adverse effects will be resolved and does not provide a process to identify and evaluate historic properties in consultation with SHPO, Tribes, and other consulting parties. As FERC is aware, HPMPs for hydroelectric facilities

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require these processes, in addition to a consultation protocol that covers timelines for review and comment, dispute resolution process, annual reporting and meeting stipulations, ongoing historic property management of the facility and others.

- The SHPO declines to comment further on the draft HPMP at this time until the comments above and comments from previous letters have been addressed by FERC.

I look forward to continuing this consultation with TNHC and the FERC. If you have any questions or concerns, please contact Kathleen Forrest, Historian, at (916) 445-7022 or Kathleen.Forrest@parks.ca.gov or Brendon Greenaway, Associate State Archaeologist, at (916) 445-7036 or Brendon.Greenaway@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

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