

ORIGINAL

COUNTY OF RIVERSIDE



Board of Supervisors

- District 1 Kevin Jeffries
951-955-1010
- District 2 John F. Tavaglione
Chairman 951-955-1020
- District 3 Chuck Washington
951-955-1030
- District 4 V. Manuel Perez
951-955-1040
- District 5 Marlon Ashley
951-955-1050

**The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426**

**Re: Lake Elsinore Advanced Pumped Storage Project
Project Number 14227
Comments to The Nevada Hydro Company's May 31, 2017 Notification of Intent to File License Application**

**FILED
SECRETARY OF THE
COMMISSION
2017 OCT - 2 P 3 59
FEDERAL ENERGY
REGULATORY COMMISSION**

Honorable Secretary Bose,

It has come to the attention of the County of Riverside, California that the Nevada Hydro Company has submitted a Notification of Intent to File License Application for their previously rejected Lake Elsinore Advanced Pumped Storage Project, and that as part of that submittal, have asked not to be required to hold new scoping meetings or produce a new environmental planning document.

The County of Riverside has many concerns regarding the pumped storage project and the 32 miles of 500kv transmission lines it would bring through the Cleveland National Forest, the community of Temescal Valley, and large areas of Multi-Species Habitat Preserve. Approval of this project would bring major public impacts, including lake water quality, dam safety issues, wildfire dangers, visual and public safety impacts from transmission lines, and disturbance of multiple sensitive habitat areas.

Since FERC last rejected Nevada Hydro Company's application in 2011, and subsequent to their last never-approved environmental documents completion in 2009, significant changes have occurred in the region environmentally, in terms of new development in Temescal Valley, and a competing and partially overlapping transmission line proposal by Southern California Edison has already advanced significantly through their own approval process. These changes demand a fresh start in any application that FERC may allow to proceed.

Nevada Hydro Company no longer has any local government partner, and prior to the Board Meeting where this letter was authorized, had not only neglected to communicate with the County of Riverside, but has refused to respond to inquiries from the Board of Supervisors. As

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such, on August 29th, the Board of Supervisors approved the attached motion, declaring the opposition of Riverside County to the renewal of the LEAPS application, and that should FERC choose to allow the application to move forward, that they require a full new environmental study, scoping meetings, and cooperation with Riverside County throughout the application process.

Thank you for your consideration of the County's request,

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Jeffries'.

Kevin Jeffries 1st District
Riverside County Board of Supervisors

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



**ITEM
3.4
(ID # 5135)**

MEETING DATE:
Tuesday, August 29, 2017

FROM : SUPERVISOR KEVIN JEFFRIES:

SUBJECT: SUPERVISOR KEVIN JEFFRIES: Riverside County Opposition to Renewal of
LEAPS Application before FERC [1st District]

RECOMMENDED MOTION: That the Board of Supervisors direct the Executive Office and our federal lobbyists to draft a letter of opposition to the renewal of the LEAPS application currently being considered by FERC.

ACTION: Policy


Supervisor Kevin Jeffries 8/15/2017

MINUTES OF THE BOARD OF SUPERVISORS

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA**

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A
NET COUNTY COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A
SOURCE OF FUNDS: N/A			Budget Adjustment: No	
			For Fiscal Year: 17/18	

C.E.O. RECOMMENDATION: [CEO use]

BACKGROUND:

Summary

The Lake Elsinore Advanced Pumping System (LEAPS) was originally proposed as far back as 1988 by the Elsinore Valley Municipal Water District (EVMWD), who later joined with Nevada Hydro Company, Inc. as the financial and development partner. This partnership has since been dissolved, and EVMWD recently brought to the 1st District's attention that Nevada Hydro Company has now unilaterally re-filed an application for the two-pronged LEAPS project without their support:

1) The advanced pumping station, for which a dam would be built in the mountains above Lake Elsinore. At night, when energy costs are low, up to 10% of the volume of the lake would be pumped up the hill and into the reservoir, and during the day, when energy prices are high, the water would be released through a hydro-electric facility, generating power on its way back into the lake. That power would then be sold on the open market.

2) 32 miles of 500 kV transmission lines and 170 high-voltage steel towers, running from San Diego County across the Cleveland National Forest, into Temescal Valley, and through the RCA's Multi-Species Habitat Conservation Areas.

After significant local opposition to the project and concerns about the inadequacy of the environmental studies produced by Nevada Hydro Company, the Federal Energy Regulatory Commission (FERC) dismissed their application in 2011.

On May 31, 2017, the Nevada Hydro Company ("Nevada Hydro") filed a Notification of Intent to File License Application ("NOI") with the Federal Energy Regulatory Commission ("FERC") for its proposed Lake Elsinore Advanced Pumped Storage ("LEAPS") Project, FERC Project No. 14227.

In resubmitting their application, Nevada Hydro Company is no longer associated in any way with EVMWD, and has no other local partners. They have not reached out to any planning staff in Riverside County or the 1st District Supervisorial Office, and have thus far refused to respond to multiple inquiries from our office and a request to attend MAC meetings in the areas impacted by this project.

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA**

They have specifically asked FERC not to require them to do new scoping meetings and to allow their never-approved EIR from 2009 to stand as is, despite the many changes in development through the 15 corridor, the increased fire dangers in the Cleveland National Forest, and the application now before the California Public Utilities Commission by Southern California Edison for transmission lines that would overlap with the LEAPS lines through portions of the Temescal Valley.

For these reasons, it is requested that the Executive Office work with our federal lobbyists and express to FERC and our Congressional and US Senate delegation the opposition of Riverside County to the renewal of the LEAPS application, and should FERC choose to allow the application to move forward, that they require a full new environmental study, scoping meetings, and cooperation with Riverside County throughout the application process.

Impact on Residents and Businesses

Approval of the LEAPS project could lead to major public impacts, including lake water quality, dam safety issues, wildfire dangers, visual and public safety impacts from transmission lines, and disturbance of sensitive habitat areas.

Document Content(s)

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