

# COUNTY OF RIVERSIDE TRANSPORTATION AND LAND MANAGEMENT AGENCY

*Tony Carstens · Agency Director*  
**Planning Department**  
*Ron Goldman · Planning Director*

March 12, 2007

Philis Posey, Acting Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20246

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FEDERAL ENERGY REGULATORY COMMISSION

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**RE: Final Environmental Impact Statement for the Lake Elsinore Advanced Pumped Storage Project, FERC NO. 11858-002**

Dear Ms. Posey:

Planning Department staff has reviewed the above Notice and Response to Comments included in the Final Environmental Impact Statement (FEIS) for the Lake Elsinore Advanced Pumped Storage Project (LEAPS).

The first modified alignment was prepared by the co-applicants' in response to public comments on the Draft Environmental Impact Statement (EIS) and proposes to place a portion of the original transmission line underground. The second modified alignment is being proposed by Commission and U.S. Forest Service staff for inclusion as an alternative alignment in the Final EIS and considers both the co-applicants' modified alignment and public comments on the Draft EIS. Both modified alignments identify the proposed underground segment of the transmission alignment being located along South Main Divide Road. Here it becomes unclear as to whether the proposed modifications include the location of the upper reservoir and powerhouse. In the Draft EIS, the co-applicants' proposed to locate the upper reservoir in Morrell Canyon and the powerhouse at Santa Rosa whereas Commission and U.S. Forest Service staff identified alternative locations as Decker Canyon and Ortega Oaks, respectively. The Modification Notice included little written discussion of the actual proposed modifications and no detailed maps of the proposed modified alignments. A statement, however, included in the Notice "that the staff alternative alignment also includes the same underground segment from the transmission line to the powerhouse as shown by the red dotted line on the co-applicants' modified transmission alignment" leads Planning staff to question the full scope of the proposed modifications.

As Planning staff has indicated in previous comments (incorporated by reference in this letter), the documents presented thus far lack sufficient detail and supporting geotechnical studies to enable the reviewer to determine the magnitude of potential impacts let alone whether said impacts can or will be mitigated through measures identified in the Draft EIS. Potential impacts resulting from subsurface blasting and excavation include impacts to ground and surface water quality; impacts to traffic and circulation if soils removed for construction of the upper reservoir and perimeter dam are inadequate for use and importation of clay from the Alberhill location is required; impacts on project components due

to the close proximity of active faults and impacts on surrounding land uses resulting from noise, air quality and incompatible land uses.

Staff believes that deferred mitigation measures pending "future studies" is a direct violation of the National Environmental Policy Act and the California Environmental Quality Act and that the Applicant should be required to provide this information prior to the Commission issuing the Hydropower License.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT  
Ron Goldman, Planning Director

  
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Kathleen Browne, Special Projects

cc: Supervisor Buster, 1<sup>st</sup> District  
Supervisor Tavaglione, 2<sup>nd</sup> District, Chairman  
Mike Shetler, Executive Office

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