



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Ecological Services  
Palm Springs Fish and Wildlife Office  
777 East Tahquitz Canyon Way, Suite 208  
Palm Springs, California 92262

In Reply Refer To:  
FWS-WRIV-06B0012-14TA0355

David Kates  
Nevada Hydro  
2416 Cades Way  
Vista, California 92081

JUL - 3 2014

Subject: Request for Comments Regarding the Lake Elsinore Advanced Pumped Storage Project (FERC Project Number P-14227)

Dear Mr. Kates:

This letter responds to your request for comments on the 2007 Final Environmental Impact Statement (2007 FEIS) for the proposed Lake Elsinore Advanced Pumped Storage Project (FERC Project Number P-14227). Specifically, you requested comments on potential environmental conditions that may have changed since issuance of the 2007 FEIS due to your reapplication for a Federal Energy Regulatory Commission (FERC) license in 2012. The reapplication involves the same project as proposed in the 2007 FEIS. The proposed project would consist of: 1) a new upper reservoir (Morrell Canyon) with a 180-foot-high main dam and a gross storage volume of at least 5,500 acre-feet, at a normal reservoir surface elevation of 2,880 feet above mean sea level; 2) a powerhouse with two reversible pump-turbine units with a total installed capacity of 500 megawatts; 3) the existing Lake Elsinore to be used as a lower reservoir; 4) about 30 miles of 500 kilovolt transmission line connecting the project to an existing transmission line owned by Southern California Edison located north of the proposed project and to an existing San Diego Gas and Electric Company transmission line located to the south, including substations and associated appurtenant facilities; and 5) local distribution facilities.

We offer the following comments and recommendations regarding potential changes since the 2007 FEIS based on our knowledge of declining habitat types and species within western Riverside County. We provide these comments in keeping with our agency's mission to work "with others to conserve, protect, and enhance fish, wildlife, and plants and their habitats for the continuing benefit of the American people." Specifically, we administer the Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), and provide comments in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401 as amended, 16 U.S.C. 661 *et seq.*). We also provide comments on public notices issued for a Federal permit or license affecting the Nation's waters pursuant to the Clean Water Act.

To facilitate evaluation of the proposed project from the standpoint of biological resources, the following updates should occur:

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1. There are new designated critical habitats for the federally endangered Munz's onion (*Allium munzii*), Quino checkerspot butterfly (*Euphydryas editha quino*), arroyo toad (*Anaxyrus californicus*), and southwestern willow flycatcher (*Empidonax traillii extimus*) and the federally threatened thread-leaved brodiaea (*Brodiaea filifolia*), California red-legged frog (*Rana draytonii*), and coastal California gnatcatcher (*Polioptila californica californica*) since the 2007 FEIS. The 2007 FEIS document should be updated to reflect the changes in these critical habitats and discuss any potential effects.
2. The 2007 FEIS is based on surveys conducted from 2001-2006. Given the long timeframe since completion of the 2007 FEIS and the potential for changes due to wildfires and other activities, we recommend completing updated surveys and habitat assessments for federally listed species and other biological resources and updating the description of potential impacts to habitats. We especially recommend updated surveys for Quino checkerspot butterfly and for any areas affected by wildfires since 2006 surveys.
3. We were informed after release of the 2007 FEIS by Nevada Hydro that retrofitting of additional powerlines in San Diego County was necessary to make the project feasible. We are not certain of the specific location of these potential activities. The FEIS should be updated to fully describe any interdependent activities that are not included and disclose the following information:
  - Quantitative and qualitative assessments of the biological resources and habitat types that will be impacted by the proposed project and its alternatives. An assessment of direct, indirect, and cumulative project impacts to fish and wildlife associated habitats, including growth-accommodating effects of the project (e.g., increased population, increased development, and increased traffic). All facets of the project (e.g., construction, implementation, operation, and maintenance) should be included in this assessment. Proposed developments in the surrounding area should be addressed in the analysis of cumulative impacts.
  - This assessment should include a list of Federal candidate, proposed, and listed species; State-listed species; and locally sensitive species that are on or near the project site, including a detailed discussion of these species and information pertaining to their local status and distribution. We are particularly interested in any and all information and data pertaining to potential impacts to populations of federally listed species. The analysis of impacts to biological resources and habitat types should include detailed maps and tables summarizing specific acreages and locations of all habitat types, as well as the number and distribution of all Federal candidate, proposed, and listed species; State-listed species; and locally sensitive species, on or near the project site that may be affected by the proposed project or project alternatives.

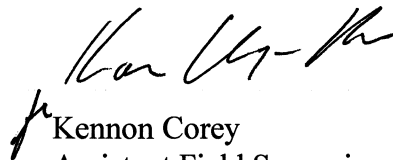
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- A detailed analysis of impacts of the proposed project on movement of wildlife, and proposed measures to avoid and minimize impacts, and mitigate unavoidable impacts to wildlife movement.
- An assessment of potential impacts to wetlands and jurisdictional waters of the United States. Section 404 of the Clean Water Act prohibits the unauthorized discharge of dredged or fill material into such waters, including wetlands. This section also provides that the U.S. Army Corps of Engineers (Corps) may issue permits for discharges of dredged or fill material into jurisdictional waters and wetlands. Potential areas of Corps jurisdiction should be evaluated and wetlands should be delineated using the methodology set forth in the Corps' Wetland Delineation Manual (Environmental Laboratory 1987). The updated FEIS should disclose all impacts to jurisdictional waters and wetlands, and proposed measures to be taken to avoid and minimize impacts, and mitigate unavoidable impacts.
- A detailed discussion of the consistency of proposed biological resource impacts with the provisions of any existing habitat conservation planning efforts.

We appreciate the opportunity to comment on the referenced 2007 FEIS. If you have any questions regarding these comments, please contact Jesse Bennett of my staff at (760) 431-9440 extension 305.

Sincerely,



Kennon Corey  
Assistant Field Supervisor

cc: Cleveland National Forest (Attn: Kirsten Winter)  
Federal Energy Regulatory Commission (Attn: Kimberly D. Bose)

Document Content(s)

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