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Elsinore-Murrieta-Anza  
Resource Conservation District

April 26, 2011

Andrew Barnsdale, CPUC  
TE/VS Project  
c/o Aspen Environmental Group  
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RE: Scoping Comments on the Notice of Preparation for the Talega-Escondido/Valley-Serrano 500 kV Interconnect Project; CPUC Application A.10-07-001

Dear Mr Barnsdale,

These comments are submitted on the Notice of Preparation (“NOP”) of an Environmental Impact Report (“EIR”) for the Talega-Escondido/Valley-Serrano 500 kV Interconnect Project (“TE/VS”) on behalf of a broad range of national and local environmental groups, and the local FireSafe Council. The organizations are very concerned that the TE/VS Project, including the connected Lake Elsinore Advanced Pumped Storage (“LEAPS”) Project, would have severe impacts on the environment and local communities. Many of these groups will be submitting comments on their own behalf during the scoping process, but wanted to emphasize the universal condemnation of environmental impacts of the LEAPS-TE/VS project and the need to fully analyze a reasonable range of alternatives.

Together LEAPS-TE/VS represents permanent and irrevocable impacts to the Santa Ana Mountains, Cleveland National Forest, San Mateo Canyon Wilderness, Margarita Peak Preserve, and the communities that surround them. These impacts must be fully analyzed and mitigated in the Draft EIR. Many of these impacts are incapable of complete mitigation and the California

Public Utilities Commission (“CPUC”) must ensure that environmentally superior alternatives for energy reliability are adopted.

The LEAPS-TE/VS project would have unacceptably severe environmental impacts on the region. The hydroelectric dam, transmission lines, and associated facilities would result in the loss of habitat for federally listed Quino checkerspot butterflies, coastal California gnatcatchers, Munz’s onions, slender-horned spineflowers, and Stephens’ kangaroo rats and would permanently eliminate sensitive plant communities, including coast live oak riparian forest, sycamore-alder riparian forest, southern willow scrub, and coastal sage scrub. The project also would destroy hundreds of acres of other habitats such as chaparral and grasslands and harm many more at risk plant and wildlife species. Furthermore, edge effects such as the spread of invasive species and visual impacts on adjacent wilderness areas would reach far beyond the areas of direct disturbance.

The LEAPS-TE/VS project would have negative impacts on water and air quality in Riverside, Orange, and San Diego counties. The construction and filling of the upper LEAPS reservoir would transport polluted water from Lake Elsinore into a pristine watershed, threatening the water quality of biologically rich San Juan Creek. It would also repeatedly churn sediment in the shallow Lake Elsinore which is already suffering from turbidity problems. Heavy construction would result in increased fugitive dust, diesel exhaust, and greenhouse gas pollution in an area that is already failing to meet federal air quality standards.

The LEAPS-TE/VS project would irrevocably change the character of the community by placing a dangerous industrial power project in an area cherished for its rural lifestyle. LEAPS-TE/VS would create a permanent scar on the landscape and generate large areas of Electro-Magnetic Fields below high-tension powerlines. It would turn peaceful recreational areas into areas dominated by overhead powerlines and new dams.

LEAPS-TE/VS would also significantly increase the threat of wildfire in rural areas and remote wildlands. Transmission lines and substations are known to increase the risk of fire ignition and—because they hamper fire fighting efforts—increase extensive fire damage. LEAPS-TE/VS would pose a significant wildfire threat to the community that must be addressed.

Importantly the CPUC must ensure that the substantive mandate of the CEQA is fulfilled to require feasible alternatives and mitigations for projects with significant unmitigable impacts, like LEAPS-TE/VS. CEQA requires that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen” a Project’s significant environmental effects. Pub. Res. Code § 21002; CEQA Guidelines 15021; see also Pub. Res. Code 21002.1(b). At a cost of over 1 billion dollars for the LEAPS/TE-VS Project there are many other feasible alternatives to address energy needs in the region.

The EIR must consider a reasonable range of alternatives that includes non-transmission and non-pumped storage alternatives that could meet the project’s purpose. This reasonable range of alternatives must not be constrained by the improperly narrowed list of project objectives proposed by the applicant, The Nevada Hydro Company, but must fully explore alternatives that meet the project purpose of increasing energy reliability, access to renewable resources, and managing intermittent energy production.

The EIR should emphasize a range of “no-wires” alternatives that avoid unnecessary environmental degradation and require energy infrastructure investments that provide a long term benefit to ratepayers. The 1 billion dollars estimated to build the LEAPS-TE/VS project could be better invested in solar panels on rooftops, energy efficiency for buildings, smart grid technology, megawatt battery storage devices, compressed air energy storage, hydrogen fuel cells, microgrids, and distributed generation, which benefits long term energy reliability for the region.

Thank you for the opportunity to submit comments to be considered on the Draft EIR for the LEAPS-TE/VS project. Please place us on the mailing list for all subsequent documentation regarding this project.

Sincerely,

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