

Lake Elsinore & San Jacinto Watersheds Authority

City of Lake Elsinore • City of Canyon Lake • County of Riverside
 Elsinore Valley Municipal Water District • Santa Ana Watershed Project Authority

FILED
 SECRETARY OF THE
 COMMISSION

November 13, 2017

ORIGINAL

2017 NOV 20 P 2:47

FEDERAL ENERGY
 REGULATORY COMMISSION

Secretary Kimberly D. Bose
 Federal Energy Regulatory Commission
 888 First Street, NE
 Washington, D.C. 20426

Dear Secretary Bose:

This letter is in response to a solicitation of comments to request additional studies for the Lake Elsinore Advanced Pumped Storage (LEAPS) Project No. P-14227-003. The Lake Elsinore and San Jacinto Watersheds Authority (LESJWA) has a significant interest in the project and its potential impacts to Lake Elsinore. LESJWA is a joint powers authority formed in 2000 as an umbrella agency consisting of five member agencies. Our mission is to implement projects and programs to rehabilitate and improve the San Jacinto and Lake Elsinore Watersheds and the water quality of Lake Elsinore and Canyon Lake, in order to preserve agricultural land, protect wildlife habitat, protect and enhance recreational resources, and improve surface and subsurface water quality, all for the benefit of the general public.

As the lead agency in the construction of many Lake Elsinore improvements such as the aeration/mixing system, island well improvements, recycled water nutrient removal, and the recycled water pipeline benefiting the lake, the proposed LEAPS project may result in significant benefit or major detrimental impacts to the long term sustainability of the lake and the surrounding communities. Under previous FERC license submittals, some studies have been conducted under the EIR work completed for the project prior to 2004. However, much of the analysis and mitigation is incomplete or very conceptual in nature. We would suggest the following additional analysis and updated scientific studies be conducted by the project proponent before approval of LEAPS hydroelectric application by FERC.

- 1) What are the environmental impacts of the lake water level fluctuations to the 14 mile lake shoreline as a result of the pumping out and releasing of water into the lake from the project?
- 2) What are the water quality impacts to the Lake of the project? Particular concern exists with the resuspension of nutrients from the lake sediments back into the lake water column which could further exacerbate nutrient releases resulting in increased algal blooms and subsequent fish kills. Early designs had indicated minimal impact but no detailed flow modeling of the LEAPS intake or discharge points have been conducted. Additionally possible oxygenation injection from the LEAPS project had also been discussed in earlier LEAPS documents but no formal analysis had been conducted on the resulting oxygen levels on the lake quality from the pump out and discharge of flows to the lake.
- 3) What are the impacts of the project to the lake fishery? The health of the lake ecosystem thrives on a good balance of different types of fish. Some type of fish such as shad feed on zooplankton in the lake which in turn helps control green algae growth. Other fish are sport game fish that are added to the lake to promote recreation and help control the shad populations. Previous LEAPS documents indicated a likely \$20,000 game fish stocking program; however, details are lacking on the type of fish, the number of fish, the frequency of the stocking or adequacy of this budget to accomplish this.

Concerns remain with the impacts on fish populations particularly during the transferring of lake water to the upper reservoir of LEAPS.

- 4) How does the project plan on complying with the Riverside County Multi-Species Habitat Conservation Plan that was officially approved by local, State, and Federal agencies? Since the project would overlie public properties of the lake body and the forest, one-to-one mitigation vs. take must be planned for.
- 5) How does the project meet the Army Corps of Engineers 404 permitting compliance? As part of the Lake Elsinore levee project, construction of the levee included ACOE permits and mitigation that included 300+ acres of wetlands in the back basin of Lake Elsinore that uses lake water to remain viable.
- 6) How and where will water be purchased and delivered to the lake to ensure its operation? The lake currently is largely dependent on the inflow of natural storm runoff to make up for any loss in lake elevation resulting from evaporation. Although recycled water is being added, the volume added each year is inadequate to make up for the loss due to evaporation. Even with projected increases of recycled water flow due to surrounding development and resulting increased wastewater flows from the EVMWD wastewater treatment plant, there is no obligation that EVMWD must deliver all recycled flows to the lake. With climate change impacts and anticipated increasing drought cycles, advanced wastewater treatment options are being explored by EVWMD to meet its long term water supply needs within their service area. Consequently, additional water supplies would need to be purchased and delivered in order to operate the LEAPS project.

If potable water, treated or untreated, is provided by a local water agency, EVMWD, WMWD, or EMWD, the purchases could have a major cost impact on the water agencies based on the MWDC imported water allocations and increased penalty rates when these allocations are exceeded. Although the purchase and addition of more water to stabilize the lake levels for LEAPS operation could have a profoundly positive impact, there is little guarantee that the additional water is available for purchase by the LEAPS operators. Further, with increasing demands on available water for potable needs in Southern California, the availability of such water for the operation of the LEAPS project or for the project impact mitigation is questionable.

- 7) What are the firefighting implications of proposed new above-ground power lines traversing forest land from the LEAPS pumping facility to power substations? If lake or storage lake water is used, how is the loss of such water accounted for and how is it paid for?
- 8) On Sept. 6th, a comment letter from Congressman Ken Calvert to FERC was transmitted expressing concern that if the 2007 EIS for LEAPS was denied by FERC in 2011, why would a 2017 EIS be considered for approval for FERC license filing? Please explain how this concern is addressed.

If you have any questions regarding these requests for additional study or responses, please contact Mark Norton at (951) 354-4221 or via email at mnorton@sawpa.org.

Sincerely,



Mark Norton PE, LEED AP
LESJWA Authority Administrator

Document Content(s)

14760969.tif.....1-2