



*A Nudist Resort for all Seasons*

September 6, 2018

David Kates  
The Nevada Hydro Company  
3510 Unocal Place, Suite 200  
Santa Rosa, CA 95403

(Sent via Linked In Email to David Kates at the Nevada Hydro Company as no communication was received by Mr. Kates with contact information and no email address nor phone number for Nevada Hydro in Santa Rosa was otherwise ascertainable with such short notice)

Jim Fargo  
Federal Energy Regulatory Commission  
888 First Street NE  
Washington, DC 20426  
(Sent via Email to [james.fargo@ferc.gov](mailto:james.fargo@ferc.gov))

Re: Lake Elsinore Advanced Pump Storage Project (FERC Project No. P-14227), Study 34 Alternative Northerly Transmission Alignments, Lake Elsinore Advanced Pump Storage Project, Riverside County, California

Dear Mr. Kates,

We would have preferred to submit more thorough responses for Study 34, but were unaware until late yesterday that comments were in fact anticipated from "affected residential communities" impacted by the proposed Study alternatives, which by definition includes Glen Eden Sun Club. However, as we never received notice from you nor anyone else at Nevada Hydro about this (or any other LEAPS issue for that matter) regarding today's deadline for receipt of comments, we're disadvantaged to provide comments in depth.

Therefore, please accept our comments in this letter, as well as incorporating in our response the comments in their entirety contained within the letter dated August 27, 2018, submitted by Matthew T. Plaxton of the Tinnelly Law Group on behalf of the Sycamore Creek Community Association.

Specifically, Study 34 involves three alternative northern transmission lines (identified as Alternative 1, 2 and 3) to the original FLA proposed route that Nevada Hydro is required by FERC to submit to additional study, as follows:

"Study 34 - Alternative Northerly Transmission Alignments Lake Elsinore Advanced Pumped Storage Project Riverside County, California

#### 1.0 INTRODUCTION

The Federal Energy Regulatory Commission (FERC) has requested that The Nevada Hydro Company (Nevada Hydro) conduct a study of the northern most transmission line segment of the proposed Lake Elsinore



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Advanced Pumped Storage (LEAPS) Project (FERC Project Number 14227). In 2007, FERC prepared a Final Environmental Impact Statement (EIS) for the project that considered three alternative routes for the proposed connection to the existing Valley Serrano (V-S) transmission line, once the line exits from the Cleveland National Forest (CNF) heading generally east. The three proposed routes considered in the EIS are shown on the attached Exhibit 1 as

- A route remains in the CNF and ties to the V-S line within the CNF (FERC Alternative 1)
- A route passing through Alberhill Ranch, tying to the V-S line above Lee Lake (FERC Alternative 2)
- A route passing through the undeveloped area between Glen Eden Road and Horse Thief Canyon Road (FERC Alternative 3)"

Of these alternatives, Glen Eden comments as follows:

Alternative 1 has the least impact on existing development and nearby residential communities and is preferred among the three. It is also preferred over the existing FLA proposed route in the EIS, which is unacceptable to Glen Eden, as we have repeatedly noted in comments to FERC. We also note that FERC has cited several impediments to Alternative 1 (cost, steep road grade, trying to move 80-ton equipment in an inaccessible area, etc.) However, Nevada Hydro should be required to mitigate the project to create the least impact on existing conditions and residents regardless of perceived difficulty, as those measures would provide more successful mitigation of the unacceptable negative impacts.

Alternative 2 would put the transmission lines right along the edge of the Horsethief Canyon neighborhood, as the FLA route does now with Glen Eden, and is equally unacceptable, therefore it should be rejected.

Alternative 3 would move the towers to the other side of Glen Eden but would have devastating impacts to several planned developments in the area and therefore is unacceptable and should be rejected.

There is another issue we'd like to address: The Conclusion section of the FERC Study 34 document suggests that Nevada Hydro may be able to merely tweak the existing FLA route to bring towers CLOSER to Glen Eden property between Glen Eden and Sycamore Creek or, in the alternative, move more toward Alternative 3, which would relocate the towers to the other side of Glen Eden:

### "3.0 CONCLUSIONS

The route proposed in the FLA and identified in the EIS still appears to have the least number of physical obstacles to construction. Potential "tweaks" to the existing proposed route could be accomplished, especially near the Glen Eden Sun Club. The line could be moved closer to the Glen Eden property on the side of a slope that would shield it more from the Sycamore Creek community, potentially without incremental impact on Glen Eden residents. The line could also be relocated to the southwestern side of Glen Eden, putting it even farther away from Sycamore Creek, but siting of the towers at the crossing of I-15 to meet the existing proposed Lee Lake Switchyard site would be more difficult.

Nevada Hydro will summarize the potential effects of each alternative segment on land use, visual, terrestrial, and cultural resources, and integrate comments from members of the public, in its final study for submittal to FERC."

These suggested "tweaks" are completely unacceptable to Glen Eden, as is the proposed route in the FLA, and should therefore be rejected.

Finally, we would note that Nevada Hydro is supposed to be consulting with "area residential communities," according to the Study 34 detail document, but Glen Eden was ignored. Because we are a residential community, we should have been — and should be going forward — consulted:

"For each of the three transmission segments identified above, the study should consider current and planned development in the area of the proposed and alternative segments and summarize the potential effects of each transmission segment on land use, visual, terrestrial, and cultural resources, and include an estimated construction cost for each segment. The study should be done in consultation with the Forest Service and area residential communities, including Lakeside Community, the Terramor Community, and the Sycamore Creek Community."

We would reiterate the closing comments of Mr. Plaxton's letter: Even given the least impactful Alternative 1,

the LEAPS northerly transmission alignments provide no positive impacts, and in fact subject the Temescal Valley to unnecessary negative impacts to the economy, quality of life, property values, current and future residential and commercial development, health and safety, aesthetics, cultural and biological resources and the Temescal Wash.

We hope that future notifications required with "affected residential communities" regarding this project will include Glen Eden—and will occur in a timely fashion.

Sincerely,

A handwritten signature in dark ink, appearing to read "Art Bell", with a long horizontal flourish extending to the right.

Art Bell  
General Manager  
Glen Eden Sun Club  
Glen Eden Corporation