

Attachment 1 – Comments Summary Table

**Appendix B, Attachment 1
Lake Elsinore Advanced Pumped Storage
Response to FERC's Additional Study Requests**

Summary of Comments Received

<u>Study #</u>	<u>Topic</u>	<u>Consulting Party</u>	<u>Comments</u>	<u>Comment Addressed / Accepted</u>		<u>Nevada Hydro Response/Notes</u>
				<u>Yes</u>	<u>No</u>	
2	Seismic Hazard	USFS	No Response			
3	Geotech	USFS	No Response			
4	Total Nitrogen and Phosphorus, and Cyanotoxin	Regional Water Board	Chose to not comment			
7	Operation Efficiency and Water Quality	Regional Water Board	Chose to not comment			
8	Aquifer Impact					
		USFWS	No Response			
		DFW	No Response			
		USFS	No Response			
9	Listed Species					
		USFWS	No Response			
		DFW	No Response			
		USFS	No Response			
28	Fire	USFS	No Response			
30	Visual					
		City of Lake Elsinore				
			Requested 6 preferred vantage points to be studied.	X		Nevada Hydro will provide renderings as requested
		Riverside County	The County requests clear renderings depicting areas through Terramor and the freeway	X		Nevada Hydro will provide renderings as requested.

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				<u>Yes</u>	<u>No</u>	
			crossing			
			The County requests that the study utilize more vantage points, specifically in areas where there is existing and proposed residential development	X		Nevada Hydro will work with the County to identify the specific vantage points for renderings.
31	Traffic					
		City of Lake Elsinore				
			This scope of work and analysis also needs to be sent and approved through County of Riverside, Caltrans District 8, Caltrans District 11, City of Wildomar, and City of Murrieta.		X	Comment noted. The project team will share the completed traffic study report with the affected agencies for review and comment as appropriate.
			Project Description, Case Springs Site: Revise "Baseline Road" to "Basilone Road".	X		Comment noted. The scope of work has been updated.
			The project is projected to take 4.5 years. Ambient traffic growth and cumulative project development will add traffic to the roadway network in that time. These need to be included in the analysis as traffic conditions could be significantly different 4 years in the future.	X		Comment noted. The scope of work has been updated.
			When is construction projected to begin? For example, if construction starts in 2020, ambient growth and cumulative projects will be included on top of the existing counts.	X		Comment noted. The construction is planned to commence in early 2020. The scope of work has been updated.
			What time does each shift start and end? This may impact the analysis hours.	X		Based on the information available at this time, the shifts are expected to be 6:30 AM to 6:30 PM and 6:30 PM to 6:30 AM. If needed, the shifts can be changed to further avoid rush hour traffic times. That could be a potential

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						mitigation measure identified and recommended as the findings of the traffic study.
			Why are classification counts not being collected? If project construction truck traffic is being converted to PCE, everything should be in PCE. This is especially helpful in the case of Caltrans freeway ramp analysis.		X	Since the project has construction truck traffic, the trip generation is converted to PCE. The baseline traffic is typically collected by PCE only if the area has a high percentage of truck traffic. Such as City of Fontana or Industry. Therefore, collecting base traffic volumes by PCE might not be needed to Lake Elsinore. This approach would also be consistent with other recently approved projects prepared by RK and other consultants in the City of Lake Elsinore.
			HCM6 methodology should be used instead of HCM2010.	X		Comment noted. The scope of work has been updated accordingly. Please note other jurisdictions INCLUDING County of Riverside and Caltrans have not yet adopted HCM6 and will likely utilize HCM 2010.
			What about weekend analysis? Upper and Lower sites are going to be working 24/7.		X	Typically, traffic impacts analyses are required to evaluate impacts during the time when the roadway system is experiencing heavy traffic volumes and has constrained capacity. During the weekend, the roadway system generally has more capacity than during the weekday AM and PM rush periods. The trip generation has also been setup to have a good portion of the traffic concentrated during the weekday AM and PM peak periods. This is a conservative assumption of course and would result in a conservative analysis since it is adding a substantial portion of the project trips at the same time when the system is peaking. It can be deducted that the weekday AM and PM impacts are greater than other time frames and weekend conditions.
			Include performance criteria for other jurisdictions.		X	Comment noted. The County of Riverside and adjacent jurisdictions consider LOS D as acceptable, consistent with the City of Lake Elsinore. Intersections operating at a deficient LOS will need to be mitigated. Also, please see response to Comment 1.

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			Which roadway segments are the 24-hour weekday counts being collected? Are they going to be classification counts?		X	The analysis will not include roadway segment analysis. The intersection analysis is a better gauge of traffic impacts since the intersections are typically the congestion points of a circulation system. Please see response to Comment 6 regarding PCE counts.
			For unsignalized intersections, a significant impact can occur without meeting peak hour signal warrants.	X		The reason for including satisfaction of signal warrants for impacting unsignalized intersections is the issue of running into failing intersections that do not meet signal warrants and automatically result in an unavoidable impact and preparation of an EIR and requiring Statement of Overriding Consideration during the approval process. Essentially, in these cases, the analysis might find unsignalized intersections that are currently failing even without the project and do not meet signal warrants to recommend signalization as mitigation. In the case of this project, since it is a construction project, utilization of a flag person would probably be recommended instead of installation of a traffic signal. The scope of work has been updated to omit the signal warrants criteria.
			Tables A-1 and A-2 – why are no other vehicles included in the Final Third phase?	X		That is correct. Based on information provided and verified by the construction management team, there are no activities during those times and phases for those elements.
			Table A-3 – why are there no vehicles for the Final Third phase? There should be at least some volume there.	X		That is correct. Based on information provided and verified by the construction management team, there are no activities during those times and phases.
			How many workers are expected to work the site at each shift?	X		A table has been added to the scope of work showing this information.
			Should a worker shuttle use a PCE factor as well if it is more like a bus?	X		Comment noted. The scope and calculations have been updated to include a PCE factor of 2.0 for shuttles.
			Please cite the source of the 1.3 persons per vehicle.	X		The factor is based on information provided by the construction management team for this and similar projects.

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			Table ABCD-4 – Why are there no outbound trips in AM or inbound trips in PM?	X		Comment noted. The tables have been revised to show inbound and outbound.
			Assuming that half of the personal vehicles and shuttles arriving in a peak hour does not seem conservative. Shifts would have certain starting and ending times and it would make sense that all the workers would show up near that time and not arrive very early or late.	X		Comment noted. Please see updated trip generation calculations and assumptions.
			Table ABCD-4 – Is the 60/40 split used? It looks like trips are being split 50/50 between the shifts.	X		The trip generation assumptions used in the analysis is actually much more conservative than 50 day/50 night or 60 day /40 night. The trip generation analysis assumes for the two-shift sites, half of the personal vehicle activity for the entire 24 hours and a quarter of the truck activity occurs in the AM and same for the PM. For the single-shift sites, all of the personal vehicle activity for the entire 24 hours and a quarter of the truck activity occurs in the AM and same for the PM Based on this assumption, all of the personal vehicle activity occurs within two hours in the entire day and half of all the truck activity for the entire day occurs in those two hours. Hence, the other half of truck activity occurs within the remaining 22 hours in the day. In reality, trucks will also avoid rush hour traffic congestion.
			Provide total trip generation tables for each construction phase.	X		Comment noted. A table has been added to show this information.
			Provide a list of study intersections and roadway segments.	X		Comment noted. The scope of work has been updated accordingly.
			Exhibit F-1/G-1 – trucks may be required to use the Central Avenue interchange to head north on I-15 as Collier Avenue is not a truck route.	X		Comment noted. Truck routes have been investigated and the truck trip distributions have been updated accordingly.

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			Exhibit F-1/G-1 – trucks are not allowed to use Grand avenue heading west per the City’s truck route map. They will have to go to Lakeshore via Riverside Drive then make a left towards Lake Street.	X		Comment noted. Truck routes have been investigated and the truck trip distributions have been updated accordingly.
			Exhibit F-1/G-1 – verify with other agencies if trucks are allowed to use Grand Avenue or Bundy Canyon.	X		Comment noted. Truck routes have been investigated and the truck trip distributions have been updated accordingly.
			Exhibit F-2/G-2 – One of the shuttle park and ride locations is in Perris. A higher percentage of trips should be using Central Avenue.		X	The distribution is based on discussions with the construction management team and the expected routes for workers.
			Exhibit G-1 – 55% distribution west of Garner Road should be 75%.	X		Comment noted. The scope of work has been updated accordingly.
			Exhibit G-2 – trips traveling south on I-15 should only use Bundy Canyon. Using Central Avenue is not practical for that direction.	X		Comment noted. The scope of work has been updated accordingly.
			Exhibit I-1 – Basilone Road north of the I-5 is Camp Pendleton Marine Base. Are trucks going to be able to access it? Are trucks able to get through the mountains?	X		Comment noted. The assumptions are based on information from the project applicant and construction management team. Based on discussions the project applicant team, permits will be secured to access that route.
			Exhibit I-2 – Clinton Keith Road leads to the I-215 which goes to Perris. Some trips should be in that direction.		X	The distribution is based on discussions with the construction management team and the expected routes for workers.
			Exhibit I-2 – No employee trips are shown toward I-5. Is this because of the Marine base?	X		The distribution is based on discussions with the construction management team and the expected routes for workers.
		Riverside County				
			The SOW provides estimates for heavy truck and passenger car trips for each site. The Transportation Department requests a quantities worksheet for each site to verify the projected truck volumes.		X	Comment noted. A breakdown can be provided by the construction management team once the numbers are further finalized.

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			The notes indicates workers would utilize shuttles in order to reduce single occupancy vehicles. In order for the trip generation and results of the traffic study to be considered valid, the recommendations of the traffic study and ultimately the mitigation the LEAPS' environmental document shall require the use of shuttles. The traffic study shall and/or the environmental document shall provide additional information on the shuttle program used by the LEAPS.	X		Comment noted.
			Based on past information disseminated on the LEAPS project, it is the Transportation Department's understanding that LEAPS would also include new transmission lines and poles that would connect one or more project sites to the electric utility grid. This traffic does not appear to be included in the SOW. If the transmission lines and poles are included in the project description, please revise the SOW to include the trip generation and trip distribution for the traffic associated with this component of LEAPS.		X	Based on information from the applicant team, the traffic associated with that activity will be very sporadic and spread over 33 miles in remote areas of the Cleveland National Forest.
			For the Upper Site, the trip distribution indicates that 20% of the worker trips are from South Main Divide Road. This road effectively terminates into a rural community as it continues southeasterly and does not appear to be a reasonable distribution for worker traffic. The Transportation Department recommends that the trip distribution be revised.	X		Comment noted. The distribution has been updated and corrected to travel on Ortega Highway as it was initially intended.
			For the Case Springs Site, the truck trips utilize roads within the Camp Pendleton	X		Comment noted. The distribution assumptions are based on information from the project applicant and

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			area, an access controlled area. Has or will LEAPS secure access to allow the truck traffic to utilize the distribution route shown in the SOW? In the event access is not obtained the traffic study shall revise its truck traffic trip distribution for the Case Springs Site. The SOW narrative also indicates that park and ride locations will be used to gather workers and shuttle them to the project sites. One such site identified is in San Juan Capistrano for the Case Springs Site. However, a review of the worker trip distribution shows no worker trips would actually travel in from the San Juan Capistrano area.			construction management team. Based on discussions the project applicant team, permits will be secured to access that route through Camp Pendleton for truck traffic.
			Please add the following intersections to the study area for the Upper and Lower Sites: Grand Avenue at Ontario Way Grand Avenue at Plumas Street-Lancashire Drive	X		Comment noted. The study area has been expanded to include the two intersections.
			Please add the I-15 freeway mainline to the traffic study area and provide an opportunity to Caltrans to review and comment on the SOW.		X	Comment noted. The I-15 Freeway mainline has been added to the scope of work for analysis. The project team will share the completed report with the affected agencies for review and comment as appropriate.
			The Transportation Department would require LEAPS to perform and provide an analysis of the pavement structure for roadways to be utilized by construction traffic. If the analysis determined the pavement would not provide sufficient load bearing capacity for the construction traffic, the Transportation Department would require the LEAPS to provide road improvements, as specified by the Director		X	Comment noted. The comment is not directly related to the traffic and CEQA LOS analysis. The comment has been forwarded to the project applicant and construction management team.

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			of Transportation. The Transportation Department would further require that the LEAPS restore all public roads, easements, and rights-of-way that may be damaged due to LEAPS-related construction activities to original or near-original condition in a timely manner.			
34	Alternate Alignments					
		USFS	No Response			
		Lakeside				
		Terramor	Advised that "...that as best it can determine from the exhibits to the Study, neither the proposed alignment nor either of the two alternatives would have adverse impacts on the Terramor Community."			Nevada Hydro acknowledges the opinions expressed
		Sycamore Creek	Provided their views on the various routes identified			Nevada Hydro acknowledges the opinions expressed
		Pacific Clay	No Response			
		Glen Eden Sun Club	Affirmed the opinions expressed in the letter of Sycamore Creek			Nevada Hydro acknowledges the opinions expressed
34b	Transformer Operation					
		CAISO				
			Suggested a modified base case	X		Nevada Hydro agrees, and will working with all parties to develop the appropriate base case
			The CAISO suggests a number of contingencies that should be analyzed	X		Nevada Hydro agrees and will working with all parties to develop and analyze the appropriate contingencies.
		SCE				
			Suggested a modified base case	X		Nevada Hydro agrees, and will working with all parties

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						to develop the appropriate base case
			SCE recommends that we “go beyond the small group of N-1 scenarios” to include all normal and contingency situations	X		Nevada Hydro will work with SCE to develop a series of normal and contingency tests to extract the situations that cause the most needed response be conducted before plunging into a quite large list of <u>all</u> normal and contingency tests.
			SCE states that an operational study be conducted a year before beginning operations.	X		Nevada Hydro agrees.
		SDG&E				
			Suggested a modified base case	X		Nevada Hydro agrees, and will working with all parties to develop the appropriate base case
			Suggested that Nevada Hydro find what the “natural flow” may be, or whether that flow is with or without LEAPS operating	X		Nevada Hydro agrees, but would like a more specific understanding about the purpose of such tests