

**FINAL APPLICATION FOR LICENSE
OF MAJOR UNCONSTRUCTED PROJECT**

STUDY 23

PROJECT CONSTRUCTION IN ROADLESS AREA

**LAKE ELSINORE
ADVANCED PUMPED STORAGE PROJECT
FEDERAL ENERGY REGULATORY COMMISSION
PROJECT NUMBER 14227**

Applicant:

THE NEVADA HYDRO COMPANY, INC.

2416 Cades Way
Vista, California 92081
(760) 599-1813
(760) 599-1815 FAX

February 2019

Item 23

Project Construction in Roadless Area

In its January 22, 2019 letter to the Nevada Hydro Company (“Nevada Hydro”), the Federal Energy Regulatory Commission (the “Commission”) in Schedule A, noted that the site of the Decker Canyon upper reservoir is located, in part, within an Inventoried Roadless Area (“IRA”) within the Cleveland National Forest.

The Commission referenced a June 29, 2018 letter to Nevada Hydro from the Forest Service (filed with the Commission on July 2, 2018) that requested Nevada Hydro describe how we would construct the upper reservoir using only existing roads. Specifically, how the equipment necessary to excavate, construct, and access this feature (dam, reservoir, and spillway) would function without road construction and use.

In its January 22, 2019 letter, the Commission requested that Nevada Hydro provide this information and relate any comments received on this issue from the US Forest Service. The following is provided in response to this request.

1.0. Construction without the need to construct “roads”.

In the figure following this response, Nevada Hydro provides a map which shows the proposed project boundary within Section 22 (the red line) as described in Section 6 of Exhibit A of the FLA (Lands of the United States within Project Boundary). Within the proposed project boundary, the figure also shows a preliminary two-dimensional layout of the upper reservoir and the boundary of the IRA. At this early stage of design, the preliminary drawing provided herein does not account for the apron and other licensee-controlled areas around the reservoir that will be necessary to construct and operate the upper reservoir. Shown in blue are two areas in the non-roadless area that can be used to access the footprint of the upper reservoir, both of which can be accessed from the existing South Main Divide Road.

As the footprint of the project facilities will lie on both roadless and non-roadless area, all equipment and vehicles will access the footprint of the project via the non-roadless area from South Main Divide Road. Earthmoving activities will take place on the footprint but no actual “roads” will be constructed on the roadless area. The movement of the earthmoving/construction equipment will change as the project is constructed and any evidence of earthmoving/construction equipment will be obliterated and non-existent when the construction is complete. All movement of earthmoving/construction equipment during construction will be confined to the actual final project boundary footprint anytime work takes place within the roadless area.

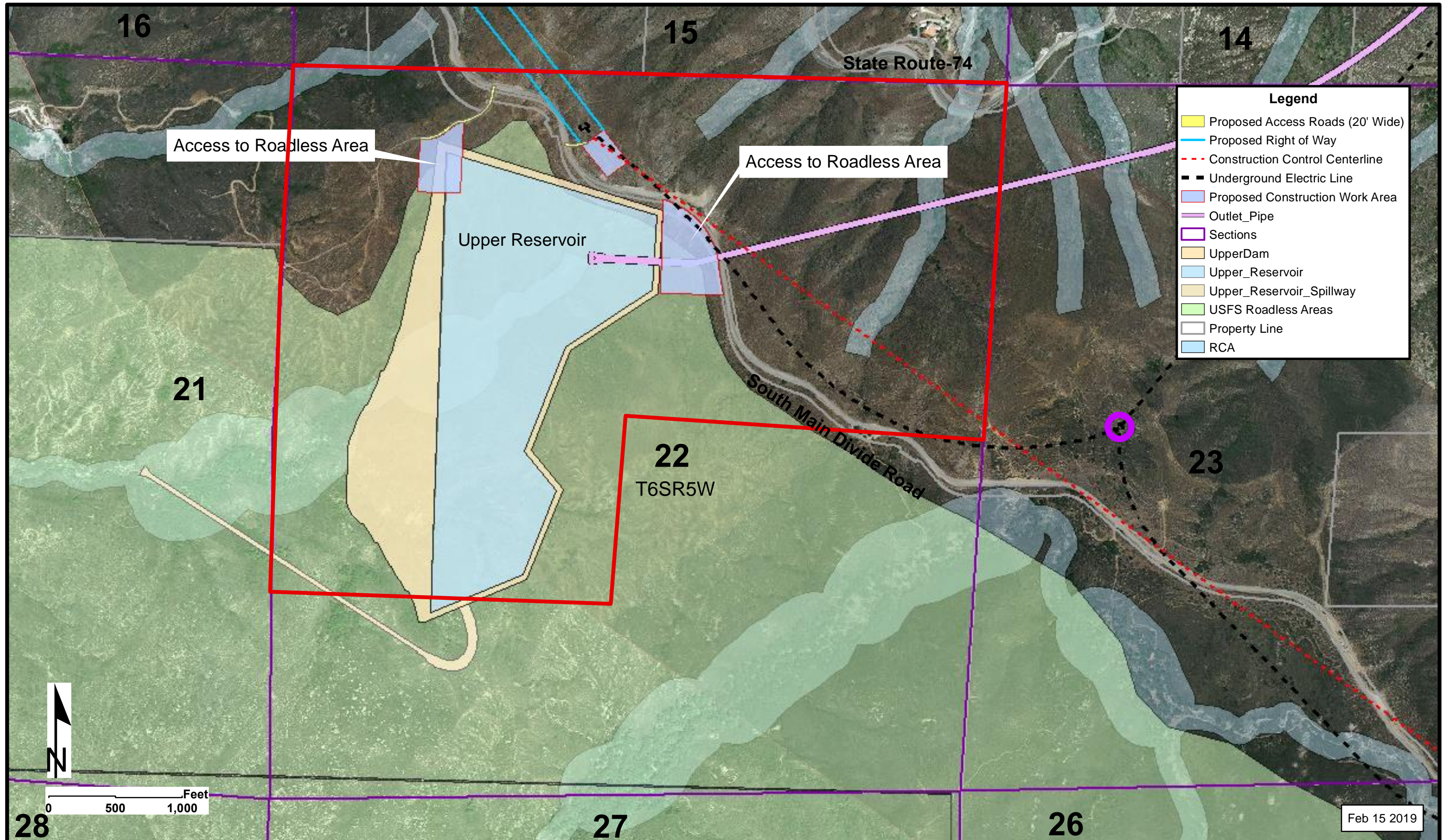
2.0. Discussions with the Forest Service

Nevada Hydro met with Forest Service personnel twice at which the “roadless issue” at Decker Canyon was discussed.

During a November 1, 2018 meeting, the Forest Service requested a description of Nevada Hydro activities to construct the upper reservoir in the IRA while not building roads and committed to providing a description of what road construction is.

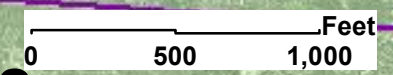
Then, at a meeting December 12, 2018, the Forest Service acknowledged that they cannot find a good definition of “road construction” and were still waiting for information from their Regional or National headquarters. The Forest Service suggested that Nevada Hydro propose construction methods to which the Forest Service could respond.

As described above, Nevada Hydro intends to access the footprint of the upper reservoir at two locations that are not located within the IRA and thus Nevada Hydro will not be engaged in any road construction in an IRA in order to construct or operate the proposed project.



Legend

- Proposed Access Roads (20' Wide)
- Proposed Right of Way
- Construction Control Centerline
- Underground Electric Line
- Proposed Construction Work Area
- Outlet_Pipe
- Sections
- UpperDam
- Upper_Reservoir
- Upper_Reservoir_Spillway
- USFS Roadless Areas
- Property Line
- RCA



Feb 15 2019