

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

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Nevada Hydro Company, Inc. -)	
Lake Elsinore Advanced Pump Storage)	Docket/Project No.: P-15261-000
Project)	
)	

MOTION TO INTERVENE (WITH COMMENT)

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (“Commission”), 18 C.F.R. §§ 385.210, 385.211 and 385.214, and the Commission’s April 8, 2022 Notice of Application Accepted for Filing and Soliciting Motions to Intervene and Protest, the Sycamore Creek Community Association (“Movant”) files this Motion to Intervene in response to the application (“Application”) sought by Nevada Hydro Company, Inc. to license the Lake Elsinore Advanced Pump Storage (“LEAPS”) Project— Federal Energy Regulatory Commission Project No. P-15261-000.

I. COMMUNICATIONS

All communications, pleadings, orders, and any other notices with respect to the above-referenced proceeding should be sent to the following individuals:

Tinnelly Law Group 27101 Puerta Real, Suite 250 Mission Viejo, CA 92691 Attn: Matthew Plaxton, Esq.	Robert This General Manager Sycamore Creek Community Association 25420 Mayhew Canyon Road Temescal Valley, CA 92883	Jerry Sincich Board President Sycamore Creek Community Association 25704 Lacebark Road Temescal Valley, CA 92883
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II. INTEREST OF MOVANT

The Final License Application filed with the Commission seeks to license, construct, and operate LEAPS with the project’s Northern Transmission Line Corridor adjacent to Movant. At this time, Movant has 1,734 homes occupied by approximately 5,000 Sycamore Creek residents.

Movant has significant concerns related to the LEAPS Project and Transmission Line Corridor, which will have a significant negative impact on Sycamore Creek residents:

1. *Ability to safely evacuate during a fire or earthquake event:* The study, conducted by San Francisco-based traffic analytics company StreetLight Data, identified one hundred (100) communities across the county with the most limited means of escaping disasters like wildfires. It found that fourteen (14) of those communities are in California, second only to Florida's twenty (20). Among the fourteen (14) communities in California rated as having the most limited evacuation routes based on analysis of data from Smartphone's and GPS devices is the Temescal Valley with only five (5) exits. The Temescal Valley's primary (Interstate 15 Freeway), secondary (Temescal Canyon Road) and a tertiary (De Palma Road) exit routes would have a LEAPS Transmission line placed over the top of these Temescal Valley roads. In the event of an earthquake or wildfire it is likely that a LEAPS transmission line would fall and block one, two or all three of these escape/evacuation routes for Sycamore Creek residents.

2. *The addition of a 500-kV transmission line over the primary and secondary Temescal Valley transportation roads:* On August 22, 2019, the Interstate 15 freeway was closed in both directions following a traffic collision, which caused a power line to fall on the Interstate 15 freeway. Southern California Edison technicians had to be summoned to remove and repair the line. Given this hazard potential, there is no need to place an additional 500-kV transmission line over a primary, secondary and tertiary transportation corridor which would become a significant safety hazard to Sycamore Creek and Temescal Valley residents during a fire, earthquake or traffic accident event. This safety hazard could be mitigated by keeping the Northerly Transmission Line corridor in the Cleveland National Forest and tie it into the Valley Serrano line in the Cleveland National Forest.

3. *Fire safety:* The Sycamore Creek community experienced the Holy Fire, a wildfire that burned areas inside and surrounding the Sycamore Creek Community. The Holy Fire burned 23,136 acres and destroyed eighteen (18) buildings. The area burned by the Holy Fire included a large swath of the projected sites for placement of the LEAPS Northern Transmission Line. The aircraft fire fighting activities utilized in the Holy Fire would have been severely hampered by the LEAPS Northern Transmission Line. These firefighting limitations would have increased the potential for Sycamore Creek property loss. Should a fire cause a transmission line to fall, it would impede/block Sycamore Creek resident's evacuation which could result in loss of life.

4. *Future residential developments:* A residential development of 110 homes adjacent to Movant and the LEAPS project Northern Transmission Line Corridor is currently undergoing the Riverside County Project approval process.

5. *Economically:* The reduction in tax (Property & Sales) revenue from the limited land uses and development activities on land near or adjacent to the Northern Transmission Line Corridor will significantly reduce the County's ability to provide service levels needed by the Sycamore Creek residents. The Sycamore Creek residents, as rate payers, will ultimately bear the burden of the Northern Transmission Line Corridor construction costs without any residential offset in energy costs or other benefits. In addition, the LEAPS project Northern Transmission Line Corridor would negatively impact Sycamore Creek residents: 1) property values; 2) community health; 3) scenic integrity.

III. CONCLUSION

The Sycamore Creek Community Association respectfully requests that the Commission grant our Motion to Intervene with comments to become a party to this proceeding as a party

with full rights to participate in all further proceedings to ensure that the interests of the Sycamore Creek Community Association are adequately represented.

Respectfully Submitted,

/s/ Matthew T. Plaxton

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/s/ Robert This

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/s/ Jerry Sincich

Jerry Sincich
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Board President for Movant

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary of the Commission in this proceeding.

Dated at Mission Viejo, CA, this 3rd day of May, 2022.

/s/ Matthew T. Plaxton, Esq.
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Attorney for Movant,
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Document Content(s)

220503_FINAL Motion to Intervene - P-15261-000.pdf.....1