



United States
Department of
Agriculture

Forest
Service

Cleveland National Forest
Trabuco Ranger District

1147 East Sixth Street
Corona, CA 92879

File Code: 2770
Date: April 10, 2019

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

Dear Ms. Bose:

This letter responds to the Nevada Hydro Company's March 5, 2019 letter: Filing to Clarify Response and to Submit Fire Study Plan (Study 28) for Approval for the proposed Lake Elsinore Advanced Storage Project (LEAPS), Federal Energy Regulatory Commission (FERC) No. 14227. In their letter, The Nevada Hydro Company (TNHC) states that:

Consultation between the US Forest Service has occurred and a final (Fire) Study Plan has been completed with no disagreements between the Forest Service and the Company. This completed study plan is submitted herein for Commission's approval.

The Forest Service disagrees with THNC's characterization that agreement exists between the Forest Service and THNC on their proposed Fire Plan. The Forest Service has communicated concerns regarding the Fire Plan, and provided TNHC with written comments¹, however none of our concerns or comments appear to have been incorporated, acknowledged, or addressed in the plan recently submitted to FERC. We do not disagree or object to certain elements TNHC has proposed in the Fire Study, however the plan lacks the analysis we've requested to determine how the proposed project could impact fire risk and fire management activities within the Cleveland National Forest.

Specifically, THNC has proposed to construct approximately 30 plus miles of 500 kV transmission lines within a very active and challenging wildland fire management zone of the Cleveland National Forest. The Cleveland National Forest Land Management Plan (LMP) established direction for this area, and specified forest-wide standards and guidelines, and site specific guidelines which include:

Goal 1.1: Improve the ability of southern California communities to limit loss of life and property and recover from the high intensity wildland fires that are a natural part of this state's ecosystem. (LMP Part 1, page 20)

Strategies and Tactics (LMP Part 2, pages 116-118)

Fire 1 - Fire Prevention

Reduce the number of human-caused wildland fires and associated human and environmental impacts. Focus fire prevention programs on the urban interface; threatened, endangered,

¹ District Ranger Darrell Vance 11/8/2018 email response, RE: LEAPs project questions (Enclosure 1)



Ms. Kimberly D. Bose

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proposed, and candidate species habitat; sensitive cultural resources; vegetative areas threatened with type conversion; and areas of major recreation use.

As proposed, the transmission lines could significantly limit and impede our fire management options and operations, and increase the risk and impacts of wildland fires in this area. Such impacts could include: increasing risk and exposure of our firefighting personnel; reducing the effectiveness of fuel management projects within the project area; decreasing our ability to manage the land in accordance with our LMP direction; or increasing fire incidents and risk to the surrounding communities through project operations.

In order to assess these impacts, the Forest Service requests that the LEAPS Fire Plan investigate:

- Establishing a baseline analysis of existing vegetative conditions and fire recurrence intervals for the project area, to compare:
- The proposed transmission lines with alternative LEAPS transmission configurations (tower size and voltage, clearances, and corridors from the proposed) and their respective effects on:
 - Powerline avoidance requirements for personnel safety – including aerial limitations.
 - Potential and frequency of disruption to services, due to the effects of wildfire or other wildfire management activities.
 - Risks associated with various configurations, and their potential to ignite wildfire due to high winds or other impacts.
 - Land, fuel, or fire management operation limitations due to infrastructure concerns
 - Response time impediments or impacts on initial attack for fire and all risk incidents
 - Impacts on fuelbreak or fuels reduction project effectiveness

Without modifications to the Fire Plan, the Forest Service will not be able to determine the potential impacts and risk posed by LEAPS to our fire management responsibilities, determine whether LEAPS will be consistent with our Forest Land Management Plan direction, or determine sufficient mitigation measures to improve public safety and reduce fire risks. We respectfully request that these concerns and comments are incorporated and assessed in a Final LEAPS Fire Plan approved by the Commission.

Sincerely,



for DARRELL VANCE
District Ranger

Enclosure: LEAPS Fire Response email chain
cc: tleong@fs.fed.us; jaheys@fs.fed.us

From: [Vance, Darrell W -FS](#)
To: [Meisinger, Nick](#)
Cc: [Crawford, Scott](#); [Leong, Tristan -FS](#); [Rodriguez, Jacob F -FS](#); [Heys, Jeffrey A -FS](#)
Subject: RE: LEAPS project questions
Date: Thursday, November 8, 2018 2:36:53 PM
Attachments: [2720-611-NHC-LEAPS-ScreeningRsp-03262018wm.pdf.pdf](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image009.png](#)
[image001.png](#)

Good Afternoon Mr. Messinger,

I've attached our earlier screening comments to NV Hydro – the Fire portion is on pages 6/7.

Moreover, here are associated comments from CNF Fire Chief Brian Rhodes:

The Cleveland National Forest is a highly dynamic and challenging environment when it comes to wildland fires. The Cleveland has experienced several large fires, most recently the Holy Fire, located on the Trabuco District. There were several unique challenges, most notably critical infrastructure within and adjacent to the fire area. These types of challenges can increase risk and exposure to firefighting personnel and divert efforts away from perimeter control, which should be included in the fire risk study.

Proposed utility corridors on the National Forest will need to include several assessments to determine their impacts. The assessments will need to investigate effects to both ground and aerial firefighting operations, given powerline avoidance requirements for personnel safety. An assessment will need to be done to include potential disruption of service to an area due to the effects of a wildfire. Last but not least, an assessment will need to be conducted to address the threat and risk associated from utilities that ignite a wildfire due to high winds or other impacts.

Hopefully those points can assist you in crafting the Fire Plan. We obviously just recently had the Holy Fire within the proposed route of the northern segment of this line. A good look at the fire history in the area should inform the study as well...

thanks



Darrell Vance
District Ranger
Forest Service
Cleveland National Forest, Trabuco Ranger District

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Caring for the land and serving people

From: Meisinger, Nick [mailto:nick.meisinger@woodplc.com]
Sent: Tuesday, November 6, 2018 3:39 PM
To: Vance, Darrell W -FS <dvance@fs.fed.us>
Cc: Crawford, Scott <scott.crawford@woodplc.com>
Subject: RE: LEAPS project questions

Darrell,

Just wanted to quickly follow up below regarding your review/comments on the Fire Study Plan for the LEAPS Project.

The most recent comments from Ms. Dawn Alvarez (USFS) provided on September 13, 2018 indicated, *"...we are still in the process of reviewing [the Fire Study Plan and the Biological Resources Study Plan] after the Holy Fire. We will provide comments on those study plans as soon as we can."*

Any update that you could provide would be greatly appreciated and will assist in our overall project planning with FERC.

Nick

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From: Vance, Darrell W -FS <dvance@fs.fed.us>
Sent: Thursday, September 13, 2018 10:35 AM
To: Crawford, Scott <scott.crawford@woodplc.com>
Subject: RE: LEAPS project questions

Good morning Scott,

My apologies for not getting back to you sooner – obviously the Holy Fire has occupied our entire workload this last month. I do see you were hoping to get a response by the end of August. If there is still a need for us to discuss, please let me know.

thanks



Darrell Vance
District Ranger

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Caring for the land and serving people

From: Crawford, Scott [<mailto:scott.crawford@woodplc.com>]

Sent: Wednesday, August 8, 2018 10:53 AM

To: Vance, Darrell W -FS <dvance@fs.fed.us>

Subject: LEAPS project questions

Good morning Vance,

I am sure you guys are extremely busy with the fire, but I have a couple of questions for you when you get a chance.

I am working with David Kates and the rest of the LEAPS project team to reply to the FERC letter by the middle of September.

One of the requests that FERC has is to identify areas that can be used as mitigation for impacts associated with the LEAPS project.

FERC does not allow compensatory mitigation or mitigation in areas outside of the project area, such as a mitigation bank or in-lieu fee program.

We don't necessarily have to identify the specific locations for mitigation, but we do need to provide sufficient documentation

that we have discussed the issue with the USFS and we can identify appropriate areas for mitigation and that there is sufficient

mitigation available for the project. I will be having a similar conversation with the RCA with respect to impacts outside of the Forest Service lands,

that will be covered under the Multiple Species Habitat Conservation Plan. Let me know if you have some time to discuss in the next week or so.

I need to pull together the information and submit a memo to FERC by the end of the August.

Kind regards,

Scott Crawford

Biology Group Manager

Environment & Infrastructure Solutions

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Document Content(s)

FERC_LEAPS Fire Study Plan Response 4102019.PDF.....1-2

Enclosure 1 LEAPS Fire Response email chain.PDF.....3-7