



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)



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