

# BEAR VALLEY ELECTRIC SERVICE, INC.

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## DATA REQUEST

**Request Date:** Monday, July 29, 2024

**Response Due:** Thursday, August 1, 2024

**To:** Jon Pecchia, Utility Manager  
Bear Valley Electric Service, Inc.  
PO Box 1547  
Big Bear Lake, CA 92315

**Cc:** Paul Marconi, Bear Valley  
Alicia Menchaca, Bear Valley

**Originator:** Blythe Denton, Wildfire Safety Analyst

**Data Request Number:** OEIS-P-WMP\_2024-BVES-007

**Subject(s):**

Q01. Regarding BVES-23-09 Radford Line Project

## REQUEST

### Q01. Regarding BVES-23-09 Radford Line Project

- a. As part of its response to this area for continued improvement, Energy Safety required BVES to include its plans to reduce impacts and delays for similar hardening projects moving forward.
  - i. Does BVES anticipate any similar future projects will occur requiring permitting and coordination with the United States Forest Service (USFS) or other permitting agencies?
    1. If so, provide lessons learned from the Radford Line project regarding plans for streamlining future permit applications, as well as contingencies to mitigate wildfire risk while waiting for permit approvals.
    2. If not, explain why.

**Response:** BVES currently does not anticipate having projects similar to the Radford Line Replacement Project requiring permitting and coordination with the United States Forest Service (USFS) or other permitting agencies in the near future. Currently, BVES anticipates its future work in the USFS will fall under a “Linear Infrastructure Utility Permit,” which is in final review with the USFS. This is a standing permit that allows the utility to conduct maintenance on its facilities in the USFS areas.

BVES has captured some lessons learned from the Radford Line Replacement Project permitting process with the USFS, which are:

1. The USFS has a very heavy workload in addition to its permitting work and has a very small staff to accomplish the workload. Additionally, the USFS has many permit requests to process and does not necessarily have the internal capability to determine which requests need to be processed as a high priority. Therefore, it is beneficial engage the USFS staff early and frequently to emphasize the priority of the project; especially, wildfire mitigation initiatives.
2. Recognize that when the federal budget is not authorized, USFS staff are typically furloughed and all permitting progress stops. Given this happens from time to time, the utility should not have such a tight project timeline that the project will be derailed by such events.
3. Any permit requests for significant projects with the USFS will require approximately 3-5 years to gain approval. Therefore, it is imperative to have a long-range project plan that includes the permitting timeline.
4. Because equipment lead times are also lengthy (sometimes 12-18 months), the utility should follow closely the permitting progress and as soon as the utility is comfortable that the permit will be approved, it should consider placing the equipment on order (before the permit is fully approved).
5. The USFS in San Bernardino County conducts a work plan meeting for their staff in October each year in which they establish which projects they will review during the next 12 months

(they operate on the Federal fiscal year). Therefore, any permit requests need to be submitted well before the October planning meeting to ensure the request is considered for the USFS's annual work plan. This does not guarantee it will be on the work schedule but increases the chances it will.

6. Meet with USFS staff before the USFS's internal October planning meeting to showcase the project and explain why the USFS should make it a priority. This does not guarantee it will be on the work schedule but increases the chances it will.
7. Traditionally, the permitting process is iterative in that the USFS will call out what it will require to evaluate the project (cultural study, biological study, stormwater assessment, etc.). Because the USFS takes several months to a year to provide direction on what will be required on a permit, assume the worst and do all the possible studies upfront and include them in the initial submittal. While this may seem burdensome, given how long each communication with the USFS takes, in the long run, it is probably the best strategy.
8. Hire an experienced permitting consultant, if not available in house, to develop the permit request right from the start and bring the consultant to any meetings with the USFS staff.
9. Recognize that certain steps in the permitting process require the USFS to reach out to other organizations such as the State Historic Preservation Officer (SHPO) and impacted Tribes (tribal consultations). These reviews also take time. Offer to assist in getting these reviews done and be ready to respond to any questions or additional information requests during these reviews. Offer to directly interface with these organizations to answer their questions.
10. Due to USFS staff shortages, some reviews will take a significant amount of time. Offer to hire specialists (e.g., biologists) to work for the USFS to conduct reviews of studies provided in the permit request.
11. USFS staff change out frequently and have periods of significant gaps in positions. For example, the District Ranger for Big Bear Lake changed out three times in the last four years with periods of over six months being gapped. Additionally, in the fire season, USFS staff are typically engaged in fire suppression efforts in the state and are not able to focus on administrative duties such as permit requests. Also, USFS staff are often temporarily assigned to other Districts experiencing staffing issues. For example, our current District Ranger is out for the next three months.
12. Despite the frequent changeover and gaps in the USFS staff, it is essential to develop working relationships with the USFS and meet as often as feasible. Meeting can often bring the new USFS staff up to speed and help highlight the importance of the specific project being pursued.
13. Work with the Congress Representative staff to help engage the USFS. The USFS is a Federal Agency and state and local officials have little to no influence on the USFS. However, the Congressional Representative and staff for the applicable area can be a valuable resource to help the USFS in prioritizing their projects.

**END OF REQUEST**