Wildfire Mitigation Plan 2026-2028
Data Response

BVES Data Request No.	OEIS-P-WMP_2025-BVES-006
Request Date:	May 9, 2025
Due Date:	May 14, 2025
Requester:	Blythe Denton, Senior Wildfire Safety Analyst

SUBJECT(S):

> Q01. Regarding BVES's Risk Assessment Improvement Plan
> Q02. Regarding BVES's Quality Assurance and Quality Control for Risk
> Q03. Regarding BVES's Pole Clearing Target (VM-10)
> Q04. Regarding BVES's UAV Inspection Findings
> Q05. Regarding Detailed Inspection Data

Total Attachments: 1

BVES RESPONSE

Q01. Regarding BVES's Risk Assessment Improvement Plan:

5.7.2 RA-1-B, 5.7.3 RA-1-C, and 5.7.4 RA-2-A are all titled as "Develop verification and validation documentation for ignition model" (pg. 68, BVES's 2026-2028 Base WMP). However, each of these initiatives have different problem statements, planned improvements, and anticipated benefits.

    a. Explain why these various initiatives share the same initiative title.
    b. For any initiative in which this is not the correct initiative title, provide the correct initiative title.

RESPONSE:
    a. RA-1-B and RA-1-C have the same title because they are both related to improving the Direxyon model. Although the problem statements differ, both call for additional modules to be integrated into the module that will improve the model's capabilities and further validate it.
    b. There is a typo on page 68 of BVES's 2026-2028 Base WMP. As shown in Table 5-6 of BVES's 2026-2028 Base WMP, RA-2-A should be titled "Develop wildfire mitigation programs and procedures to support use of integrated models."

Q02. Regarding BVES's Quality Assurance and Quality Control for Risk:

In BVES's 2026-2028 Base WMP, BVES provides the same description and verbatim content for its quality assurance and quality control for its risk model in section 5.6 and section 5.6.1, referencing Technoylva's independent review through Guide ASTM E 1355.

    a. If the repetition of the content for these two sections was not intended, provide an updated version of these sections with the corrected content.

RESPONSE:
    a. The content in Section 5.6 was accidently duplicated using the content from Section 5.6.1. Section 5.6 should have no introductory content as the technical details are contained within Section 5.6.1 and Section 5.6.2.

Q03. Regarding BVES's Pole Clearing Target (VM-10):

On page 181 of its 2026-2028 Base WMP, BVES sets annual targets in 2026, 2027, and 2028 of 70 poles. On page 207 of BVES's 2026-2028 Base WMP, BVES states "Bear Valley has created a plan to complete pole clearing operations on all poles that are included in the Radford Line (sub-transmission). This line is in a remote forest area inaccessible by roads. These assets are in the HFTD Tier 3. This section of the service territory will have an annual clearing of all flammable material and vegetation in a 10-foot radius around the base of every pole."

    a. Of the 70 poles targeted for pole clearing specify how many of those poles:
        i. Are part of BVES's Radford Line (sub-transmission)?

ii. Are required to be cleared under Public Resources Code (PRC) 4292?
iii. Are not required to be cleared under PRC 4292?
b. How many poles in BVES's service territory are PRC 4292 non-exempt?
i. If BVES does not have an exact number value, provide an estimate.
c. How many poles in BVES's service territory are in State Responsibility Area (SRA)?
i. If BVES does not have an exact number value, provide an estimate.

RESPONSE: a) All 70 poles are within the Radford sub-transmission line and are exempt pole under PRC 4292. BVES chose these poles because they are in the least accessible and located in the highest risk area of BVES service territory. b) BVES does not have an estimate for how many poles have non-exempt equipment. BVES policy is when non-exempt equipment is identified in the field, it is schedule to be replaced. c) Approximately 3,046 poles are located within the State Responsibility Area.

Q04. Regarding BVES's UAV Inspection Findings:
a. In response to DR OEIS-P-WMP_2025-BVES-005, Q5, BVES, BVES provided data related to its UAV inspection program in 2024. Is BVES able to distinguish findings identified by UAV Thermography images from findings identified by UAV photography/ videography?
i. If so, describe how BVES distinguishes the findings.

RESPONSE: BVES contractors provides a web-based portal that contains all pictures and reports. BVES can distinguish the findings within the portal that the data is stored. During the QC process BVES inspector can identify if finding is present on the pole.

Q05. Regarding Detailed Inspection Data:

In response to DR OEIS-P-WMP_2025-BVES-005, Q5, BVES provided detailed inspection data for 2021, 2022, and 2023. The data provided did not include any inspections that resulted in no findings or any inspections that resulted in level 1 condition findings.

a. Did BVES perform any detailed inspections that resulted in no findings or level 1 condition findings in 2021, 2022, or 2023?
i. If so, please update the Detailed Inspections Findings sheet of attachment 5b. inspection table with all inspections performed in 2021, 2022, and 2023, including those that resulted in no findings and level 1 condition findings.

RESPONSE: BVES had (3) three level 1 findings from detailed inspection within the years of 2021-2023. Attached document "5b. Inspection Table" has been updated with the findings. BVES did not use these finding in the analysis for table 8-2 from the previous data request because there were too few findings. BVES does not have complete list of poles that were inspected and their findings. In previous years BVES only recorded poles that had findings. For table 8-2 BVES estimated the total number of poles that were inspected.