



Oregon

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To: Energy Facility Siting Council

From: Kellen Tardaewether, Senior Siting Analyst, Oregon Department of Energy
Siting Division

Date: March 7, 2025

Subject: Agenda Item G (Information Item): Review of Department Draft Templates for Construction and Operational Mitigation Plans for the Wildfire Prevention and Risk Mitigation standard (OAR 345-022-0115), for the March 22, 2025 EFSC Meeting.

Attachments: Attachment 1: Draft Construction Wildfire Mitigation Plan Template
Attachment 2: Draft Operation Wildfire Mitigation Plan Template

WILDFIRE PREVENTION AND RISK MITIGATION STANDARD

At its September 20, 2024 meeting, the Energy Facility Siting Council (EFSC or Council) was provided an update on the implementation of its newest standard, the [Wildfire Prevention and Risk Mitigation standard](#), as adopted by Council in July 2022.

The standard requires the Council to find that: 1) an applicant or certificate holder has adequately characterized wildfire risk within the analysis area using current data from reputable sources; and 2) that any proposed EFSC jurisdictional facility or facility, with proposed changes, will be operated in compliance with a Council-approved wildfire mitigation plan (WMP) during both construction and operations. The standard also provides that the Council may approve a facility without making these findings if the facility is subject to a wildfire protection plan approved by the Oregon Public Utility Commission (PUC) or the governing body of a consumer-owned utility.

This staff report was prepared based on Council's review of the standard and other entities WMP's during the September 2024 meeting, as well as Council feedback during project-specific review of the standard and WMP's, the Department's ongoing process improvement efforts, and coordination with reviewing agencies, applicants and certificate holders.

The Department provided the draft templates to the following agencies for them to provide feedback on the sufficiency of wildfire risk mitigation measures in the templates:

- Staff at the Oregon Public Utility Commission - Utility Safety, Reliability and Security Division, responsible for review of OPUC Wildfire Mitigation Plans; and
- Staff at the Oregon State Fire Marshal - Community Risk Reduction Manager, responsible for reviewing and coordinating County Community Wildfire Protection Plans.

DEPARTMENT DRAFT WILDFIRE MITIGATION PLAN TEMPLATE NOTES

- The templates are an option for applicants and certificate holders to use.
- The templates were drafted in consideration of solar facilities, however, can be updated for other types of energy facilities.
- The templates are intended to be updated during the review of an Application for Site Certificate or Request for Amendment based on the proposed facility or proposed changes to a facility, and based on agency coordination, to the extent that measures such as design features can be determined during WMP review.
- The Department applied the coding it uses in its site certificates and conditions to specify when an action must be completed as provided below:

Key	Type of Conditions/Phase of Implementation
GEN	General Conditions: Design, Construction and Operation
PRE	Pre-Construction Conditions
CON	Construction Conditions
PRO	Pre-Operational Conditions
OPR	Operational Conditions
RET	Retirement Conditions

WMP TEMPLATE WILDFIRE RISK MITIGATION MEASURES

Finalization

Prior to Construction (PRE) and prior to Operation (OPR), the WMPs will be finalized to:

- Update facility design and include figures illustrating:
 - Areas subject to high wildfire risk;
 - Fire break areas such as roads dimensions, setbacks, fire breaks;
 - Entry/exit locations; and
 - Location(s) of water truck(s) and fire protection equipment.
- Provide updated contact information for local fire departments, certificate holder, contractors, and landowners within 0.5 miles of the facility site. Updated landowner letter to be sent to residences and includes certificate holder, Department and local emergency notification system contact information.
- Conduct safety and fire-prevention measure trainings.
- OPR only – Update Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*.

Fire Prevention and Mitigation Measures

Fire prevention and mitigation measures implemented during Construction (CON) and Operation (OPR) include:

Specifications for Fire Protection Equipment (WMP Section 3.3):

- Fire extinguishers, shovels, and water trucks with pump, nozzle and hose.
- Spark arrester that meets U.S. Forest Service Standards.

Fire Precaution Levels and Restrictions during Fire Season (WMP Section 3.6):

Table 1: Fire Prevention Measures During Fire Season Summary


Requirement	 Non-Fire Season	 Fire Season	 Fire Weather Watch	 Red Flag Warning
Fire weather advisory	Not required	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins.	Check for fire weather advisory daily before work begins. On-site personnel must be aware of Red Flag Warning.
On-site water source	N/A	As specified in Section 3.2	As specified in Section 3.2 and 3.3.	As specified in Section 3.2 and 3.3.
Hot work	Only permitted on roads or on non-combustible surfaces.	Only permitted on roads or on non-combustible surfaces; fire watch required for 60 minutes after completion	Not Permitted	Not Permitted
Fire Watch Service	Not required	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.	During breaks and for 60 minutes after all power-driven machinery has been shut down for the day.
Driving and Parking	As described in Section 3.5.	As described in Section 3.5.	Only permitted on roads or on non-combustible surfaces and Section 3.5.	Only permitted on roads or on non-combustible surfaces and Section 3.5.

Table 1: Fire Prevention Measures During Fire Season Summary

Requirement	 Non-Fire Season	 Fire Season	 Fire Weather Watch	 Red Flag Warning
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

Vegetation Management (WMP Section 3.7)

- Vegetation within the fence line and below the solar arrays will be maintained in accordance with the approved Revegetation and Reclamation Plan for the facility.
- Vegetation will be limited to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment.
- Mowing must be done in advance of fire season or in accordance to any fire restrictions.
- Vegetation free areas will be maintained.
- OPR only – Vegetation assessment surveys and maintenance, and well as facility component inspections, inspection frequency, maintenance and schedules tracked in Table2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*

Plan Updates: Amendments and Reporting Requirements

The following information must be provided to the Department in the Semi-Annual Construction Report (CON):

- Changes in wildfire risk at the site;
- Changes in emergency contact information;
- Changes in landowners within the analysis area;
- Copy of the Fire Season Restriction Log maintained during Fire Season.

The following information must be provided to the Department in the Annual Report (OPR):

- Changes in wildfire risk at the site;
- Changes in emergency contact information;
- Changes in landowners within the analysis area;
- Completed Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*, or similar inspection and maintenance checklist;
- Copy of the Fire Season Restriction Log maintained during Fire Season.

This data may be used to determine the performance of the WMPs. If determined by certificate holder or Department, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation. ODOE, acting within its delegated authority of EFSC, may amend the WMP without amendment of the site certificate. ODOE will notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of the WMP agreed to by ODOE.

AGENCY FEEDBACK

Staff at the Oregon Public Utility Commission - Utility Safety, Reliability and Security Division, indicated that the WMP templates include the wildfire risk mitigation measures that need to be addressed.

The Department is awaiting responses from the Oregon State Fire Marshal - Community Risk Reduction Manager, and will provide any feedback and edits to the templates at Council's March 21 EFSC Meeting.