

ATTACHMENT U-3
DRAFT FIRE PREVENTION AND SUPPRESSION PLAN

Draft Fire Prevention and Suppression Plan

Boardman to Hemingway Transmission Line Project



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Agency Review Process

The agency review process outlined in this section aligns with the OAR 345-025-0016 agency consultation process applicable to monitoring and mitigation plans.

To afford an adequate opportunity for applicable local, state and federal agencies to review the draft plan prior to finalization and implementation, and any future plan amendments, the certificate holder shall implement the following agency review process.

Step 1: Certificate Holder's Update of Draft Plan or Future Plan Amendment: The certificate holder may develop one Fire Prevention and Suppression Plan to cover all construction activities for the entire facility; or, may develop individual plans per county, segment or phase, as best suited for facility construction. Based on the draft Fire Prevention and Suppression Plan included as Attachment U-3 of the Final Order on the ASC, the certificate holder shall update the draft plan(s) based on facility design and construction plans. If the plan(s) are amended following finalization, the certificate holder shall clearly identify and provide basis for any proposed changes.

Step 2: Certificate Holder and Department Coordination on Appropriate Review Agencies and Agency Review Conference Call(s): Prior to submission of the updated draft plan, or any future amended plans, the certificate holder shall coordinate with the Department's Compliance Officer to identify the appropriate federal, state and local agencies to be involved in the plan review process. In this instance, "appropriate" federal agencies are based on fire protection service territories where facility components would be sited. Once appropriate federal, state and local agency contacts are identified by the Department and certificate holder, the Department's Compliance Officer will initiate coordination between agencies to schedule review/planning conference call(s). The Department and certificate holder may agree to schedule separate conference calls per county.

The intent of the conference call(s) are to provide the certificate holder, or its contractor, an opportunity to describe details of the updated draft or amended plan; and, agency plan review schedule. Agencies may provide initial feedback on requirements to be included in the plan during the call, or may provide written comments during the 14-day comment period. The Department will request that any comments provided be supported by an analysis and local, state or federal regulatory requirement (citation).

The certificate holder may coordinate with appropriate review agencies, in advance of or outside of the established agency review process; however, this established agency review process is necessary under OAR 345-025-0016 and may result in more efficient plan finalization and amendment if managed in a consolidated process, utilizing the Department's Compliance Officer as the lead Point of Contact.

Step 3: Agency Review Process: Either with, or prior to, the agency conference call(s), the certificate holder shall distribute electronic copies of the draft, or future amended, plan(s) requesting that the Department coordinate agency review comments within 14-days of receipt, or as otherwise determined feasible. Following the 14-day agency review period, the Department will consolidate comments and recommendations into the draft, or amended, plan(s), using a Microsoft Word version of the plan provided by certificate holder. Within 14-days of receipt of the agency review comments, the certificate holder shall provide an updated final version of the plan, incorporating any applicable regulatory requirements, as identified during agency review or must provide reasons supporting exclusion of recommended requirements. Final plans will be distributed to applicable review agencies by the Department, including the certificate holder's assessment of any exclusions of agency recommendations, and a description of their opportunity for dispute resolution.

Step 4: Dispute Resolution: If any review agency considers the final, or amended, plan(s) not to adhere to applicable state, federal or local laws, Council rules, Council order, or site certificate condition or warranty, the review agency may submit a written request of the potential violation to the Department's Compliance Officer or Council Secretary, requesting Council review during a regularly scheduled Council meeting. The Council would, as the governing body, review the violation claim and determine, through Council vote, whether the claim of violation is warranted and identify any necessary corrective actions.

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ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
IPC	Idaho Power Company
kV	kilovolt
ODF	Oregon Department of Forestry
ORS	Oregon Revised Statute
Plan	Fire Prevention and Suppression Plan
Project	Boardman to Hemingway Transmission Line Project
RFPA	Rural Fire Protection Association
RFPD	Rural Fire Protection District
ROW	right-of-way
UL	Underwriters Laboratories
USFS	United States Forest Service

1.0 INTRODUCTION

Idaho Power Company (IPC) is proposing to construct, operate, and maintain a high-voltage transmission line between Boardman, Oregon, and the Hemingway Station in southwestern Idaho, known as the Boardman to Hemingway Transmission Line Project (Project) as an extension of IPC's electrical system. The Project includes 270.8 miles of new single-circuit 500-kilovolt (kV) transmission line, removal of 12 miles of existing 69-kV transmission line, rebuilding of 0.9 mile of a 230-kV transmission line, and rebuilding of 1.1 miles of an existing 138-kV transmission line into a new right-of-way (ROW). The Project includes ground-disturbing activities associated with construction of transmission support structures; their associated construction work areas; pulling sites for tensioning conductors; access roads to each structure; multi-use areas; light-duty fly yards; communications stations; and stations. The Project crosses private land and public lands administered by the Bureau of Land Management (BLM), United States Forest Service (USFS), Bureau of Reclamation, Department of Defense, and the states of Idaho and Oregon.

This preliminary Fire Prevention and Suppression Plan (Plan) describes the framework for measures to be taken by IPC and its contractors (Contractor) to ensure fire prevention and suppression measures are carried out in accordance with federal, state, and local regulations. Measures identified in this Plan apply to work within the project area defined as the ROW; access roads; all work and storage areas, whether temporary or permanent; and other areas used during construction and operation of the Project. The Oregon Department of Energy (ODOE or Department) incorporated revisions and additional text included by the applicant in its ASC Exhibit U Errata.

1.1 Purpose

The risk of fire danger during transmission line construction is related to smoking, refueling activities, operating vehicles and other equipment off roadways, welding activities, and the use of explosive materials and flammable liquids. During operation, the risk of fire is primarily from vehicles and maintenance activities that require welding. Additionally, weather events that affect the transmission line could result in the transmission line igniting a fire.

This Plan establishes standards and practices to minimize risk of fire ignition and, in case of fire, provide for immediate suppression.

1.2 Oregon's Wildfire Protection System

The prevention and suppression of wildfires in eastern Oregon is carried out by the BLM, USFS, Oregon Department of Forestry (ODF) in conjunction with the Rangeland Fire Protection Associations (RFPA) and Rural Fire Protection Districts (RFPD), and local fire districts and agencies (Table 1). The agencies' activities are closely coordinated, primarily through the Pacific Northwest Wildfire Coordinating Group. Coordination of firefighting resources also occurs under Oregon's *Emergency Conflagration Act* that allows the state fire marshal to mobilize and dispatch structural firefighting personnel and equipment when a significant number of structures are threatened by fire and local structural fire-suppression capability is exhausted (ODEQ 2003).

Table 1. Fire Suppression Responsibilities in Oregon

Who	Where	Miles of Proposed Route
Bureau of Land Management	National System of Public Lands	67.7
Department of Defense	Naval Weapons Systems Training Facility Boardman	10.5
U.S. Forest Service	National Forest (NF) and National Grasslands	5.9
City fire departments and rural and rangeland fire protection districts in mutual aid with Oregon Department of Forestry	Structures in Oregon's wildland interface areas covered by mutual-aid agreements. Rangeland fire protection associations on rangeland areas of eastern Oregon outside of both a forest protection district and a rural fire district.	187

Source: ODEQ 2003; GIS Ownership_Analysis_20110804.xlsx.

1.3 Responsibilities and Coordination

This Plan will be implemented by IPC and the Contractor on the Project. IPC and the Contractor are responsible for providing all necessary fire-fighting equipment on the project site to their respective employees and operating under the requirements of this Plan. Prior to construction, the Contractor and IPC will contact the appropriate fire-control authorities and emergency response providers to establish communications (including radio frequencies), obtain any required permits (such as burning or fire waiver permits prior to conducting any heavy equipment or burning activities), and/or fulfill other obligations as directed by fire-control authorities. For facility components located within a fire prevention and response providers' service territory, the distance from service provider to facility component is identified in Table 2 below:

Table 2: Fire Response Providers, per County and Route, and Provider Distance from Site Boundary

Fire Response Organization per County/Route	Miles from Site Boundary
Morrow County	
Proposed Route	
Boardman RFPD	3.0
Pilot Rock RFPD	0.1
Department of Defense (Navy)	10.5
None	44.4
West of Bombing Range Road Alternative 1	
Department of Defense (Navy)	0.1
None	3.7
West of Bombing Range Road Alternative 2	
Department of Defense (Navy)	1.8
None	3.7
Umatilla County	
Proposed Route	
Pilot RFPD	19.7
Northeast Oregon (OFD)	21.2
None	0.0
Union County	
Proposed Route	
La Grande RFPD	1.9

Table 2: Fire Response Providers, per County and Route, and Provider Distance from Site Boundary

Fire Response Organization per County/Route	Miles from Site Boundary
North Powder Fire Dept.	10.2
Northeast Oregon (OFD)	30.1
Bureau of Land Management	0.2
U.S. Forest Service	6.8
None	0.0
Morgan Lake Alternative	
Northeast Oregon (OFD)	18.5
Bureau of Land Management	0.8
None	0.0
Baker County	
Proposed Route	
Burnt River RPA	32.2
Lookout Glasgow RPA	13.3
North Powder Fire Dept.	9.2
Vale RPA	0.0
Northeast Oregon (OFD)	8.2
Bureau of Land Management	11.9
None	5.5
230 kV Rebuild	
Lookout Glasgow RPA	0.9
Malheur County	
Proposed Route	
Adrian RFPD	9.5
Jordan Valley RPA	12.8
Vale RPA	44.9
Bureau of Land Management	53.3
None	7.0
Double Mountain Alternative	
Vale RPA	7.4
Bureau of Land Management	7.4
130 kV Rebuild	
Vale RPA	1.1

The Contractor and IPC will be responsible for coordinating emergency contact information for the facility to relevant emergency responders prior to and during both construction and operation. The Contractor and IPC shall provide, for the facility, its emergency contact name, employer, phone number and business address to, at a minimum: Sheriff’s Office, Police Department, Emergency Service Office, Public Works Department, Forest Service, and Ranger Station Interagency Dispatch Centers, as applicable per county,

The Contractor and IPC will also do the following:

- Ensure prevention, detection, pre-suppression, and suppression activities are in accordance with this Plan and federal, ODF, and county laws; ordinances; and regulations pertaining to fire.
- Accompany agency representatives on fire tool and equipment inspections and take corrective action upon notification of any fire-protection requirements not in compliance.
- Restrict operations on federal lands during conditions of high fire danger as described in Section 2.2, Restricted Operations.

As per Oregon Administrative Rule 345-022-0110, construction and operation of the Project and related mitigation are not likely to result in significant adverse impact to the ability of public and private providers to provide fire protection. The fire prevention and suppression measures described in this Plan will be in effect from pre-construction to the end of restoration. These restrictions may change by advance written notice by fire-control authorities. However, required tools and equipment will be kept in serviceable condition and will be immediately available at all times.

1.4 Fire Response Agreements

In areas not covered by a fire response organization or located on federal land, the certificate holder will attempt to negotiate an agreement with the relevant fire response organization or federal agencies as presented in Table 2 above, outlining communication and response procedures for potential fires within their boundaries during facility construction and operation. In those areas not covered by a fire response organization and not located on federal land, the certificate holder will attempt to negotiate an agreement with nearby fire response organizations or the federal agencies to provide fire response. If no such agreements can be reached during construction, the certificate holder will propose alternatives such as contracting with a private fire response company or providing additional firefighting equipment at those sites. If no such agreements can be reached during operation, the certificate holder will consult with the local dispatch centers and report to the ODOE the dispatch center's procedures for responding to wildfires in those areas without fire district coverage. The certificate shall provide documentation to the Oregon Department of Energy, demonstrating the final agreements or alternative contract agreements for fire response.

2.0 FIRE PREVENTION MEASURES

2.1 Preconstruction and Construction

Methods and procedures to be implemented prior to and during construction, operation, maintenance, and termination of the Project to minimize the risk of fire are described in the following sections. The methods and procedures outlined below follow guidance in ODF's *Fire Prevention Rules*, OAR Chapter 629, Division 43 (ODF 2017).

2.1.1 Training

The Contractor and IPC will train all personnel on the measures to take in the event of a fire. The Contractor and IPC will immediately proceed to control and extinguish any fire started resulting from their activity. The Contractor and IPC will also inform crew member of fire dangers, locations of extinguishers and equipment, and individual responsibilities for fire prevention and suppression during regular safety briefings. Smoking and fire rules also will be discussed with all field personnel during the Project's environmental training.

2.1.2 Smoking

Smoking is prohibited except in areas a minimum of 10 feet in diameter that have been cleared and graded to bare soil. All burning tobacco and matches will be extinguished before discarding. Smoking is also prohibited while operating equipment or vehicles, except in enclosed cabs or vehicles.

Smoking is never permitted in any area designated by DANGER or NO SMOKING signs. Smoking is not permitted in these areas regardless of any other factor. Smoking is not permitted on the transmission line ROW. Smoking is only permitted on access roads, within vehicles, and in approved smoking areas as described previously.

2.1.3 Spark Arresters

During construction, operation, maintenance, and decommissioning of the ROW, all equipment operating with an internal combustion engine will be equipped with federally-approved spark arresters. Spark arresters are not required on trucks, buses, and passenger vehicles (excluding motorcycles) equipped with an unaltered muffler or on diesel engines equipped with a turbocharger. Agency fire-inspection officers will have full authority to inspect spark arresters on Project equipment prior to its use on the Project on federal lands and periodically during construction.

2.1.4 Parking, Vehicle Operation, and Storage Areas

In no case will motorized equipment, including worker transportation vehicles, be driven or parked outside the designated and approved work limits. Equipment parking areas, the ROW, staging areas, designated vehicle-parking areas, and small stationary engine sites—where permitted—will be cleared of all flammable material. Clearing will extend a minimum of 2 feet beyond the edge of the area to be occupied but not beyond the boundaries of the approved ROW, extra workspace, or ancillary site. Glass containers will not be used to store gasoline or other flammables.

2.1.5 Equipment

All motor vehicles and equipment will carry at least 1 long-handled (48-inch minimum), round-point shovel with a blade no less than 8 inches wide; a double-bit ax or Pulaski (3.5 pounds or larger) with a handle of not less than 26 inches long; one 16–20 pound dry chemical fire extinguisher (with an Underwriters Laboratories [UL] rating of at least 5B or C); and 20–50 gallons of water with a mechanism to effectively spray the water. Individuals using power saws and grinders will have a shovel as described above, and an 8-ounce capacity fire extinguisher immediately available. All equipment will be kept in a serviceable condition, stored in a clearly identified tool box, and readily available. Larger water supplies of 300 gallons or larger (self-propelled) or 500 gallons (not self-propelled) with a pump capable of providing not less than 20 gallons per minute at a pressure of at least 115 pounds per square inch at pump level will be made available as conditions warrant. A nozzle, and enough serviceable hose of not less than ¾ inch inside diameter, to reach from the water supply to any location in the operation area affected by power driven machinery, or 500 feet, whichever is greater will be made available. In some situations, ODF district may allow alternate methods that may provide equal or better suppression of fire.

All power saws will be equipped with an exhaust system which retains at least 90 percent of carbon particles as required by spark arrester guidance, be stopped while fueling, and moved at least 20 feet from the place of fueling before being restarted. Each power saw must have an 8-ounce or larger fire extinguisher and a round pointed shovel (8-inch-wide face and more than 26-inch handle) nearby for immediate use.

The firewatch must constantly observe the operation area during any breaks (up to three hours) in operation activity and for three hours after the power driven machinery used by the operator has been shut down for the day; visually observe all portions of the operation area on which operation activity occurred during the preceding period of activity; and be qualified in the use and operation of assigned firefighting equipment and tools; be physically capable of performing assigned fire suppression activities; and be advised of single employee assignment responsibilities (OAR 437-007-1315), when working alone. Each person providing fire watch service on an operation area must have adequate facilities for transportation and communication to be able to summon firefighting assistance in a timely manner. Upon discovery of a fire, fire watch personnel must first report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities and agree on a checking system; then after determining a safety zone and an escape route that will not be cut off if the fire increases or changes direction, immediately proceed to control and extinguish the fire, consistent with firefighting training and safety.

The Contractor and IPC shall maintain a list, to be provided to local fire-protection agencies, of all equipment that is either specifically designed for, or capable of, being adapted to fighting fires. The Contractor and IPC shall provide basic fire-fighting equipment on-site during construction, including fire extinguishers, shovels, axes, and other tools in sufficient numbers so each employee on-site can assist in the event of a fire-fighting operation.

2.1.6 Road Closures

The Contractor and IPC will notify the appropriate fire-suppression agency of the scheduled closures prior to the open-cut crossing of a road. If required, the Contractor and IPC will construct a bypass prior to the open-cut installation of a road crossing, unless a convenient detour can be established on existing project-approved roads or within project-approved work limits. All bypasses will be clearly marked by the Contractor and IPC. During road closures, the Contractor and IPC will designate one person who knows the bypass to direct traffic. The Contractor and IPC will minimize, to the extent possible, the duration of road closures.

2.1.7 Refueling

Fuel trucks will have a large fire extinguisher charged with the appropriate chemical to control electrical and gas fires. The extinguisher will be a minimum size 35-pound capacity with a minimum 30 BC rating. Power-saw refueling will be done in an area that has first been cleared of material that could catch fire.

2.1.8 Burning

Contractor and IPC personnel are prohibited from burning slash, brush, stumps, trash, explosives storage boxes, or other Project debris unless specifically contracted to do so. No cooking or warming fires or barbecue grills will be allowed. Burn permits are required for all burning except camp fires during closed fire season on lands protected by ODF (Oregon Revised Statute [ORS] 447.515) and, once Regulated Use Closure has been executed, burning of any type is banned with no exceptions (ORS 447.535) (ODF 2015).

2.1.9 Flammable Liquids and Explosives

The handling and use of explosives shall be conducted in strict conformance with all local, state, and federal regulations as detailed in IPC's Construction Specification on Blasting.

2.1.10 Communications

The Contractor and IPC will be responsible for maintaining contact with fire-control agencies and will be equipped with a radio or cellular telephone so immediate contact with local fire-control agencies can be made. If cellular telephone coverage is not available, the Contractor and IPC will use the radio to contact their base, who will telephone emergency dispatch.

2.1.11 Welding

One 5-gallon back-up pump will be required with each welding unit in addition to the standard fire equipment required in all vehicles. All equipment will be kept in a serviceable condition and readily available. Individuals using power saws and grinders will have a shovel as described above, and an 8-pound capacity fire extinguisher immediately available. During fire season, a spotter equipped with a shovel and a fire extinguisher will be required to be present if wildland fuels are present where work is being performed.

2.1.12 Fire Suppression

The Contractor and IPC will take the following actions should a fire occur within the Project area during construction:

- Site personnel will aid in extinguishing a fire ignition before it gets out of control and take action that a prudent person would take to control the fire while still accounting for their own and others safety.
- Immediately notify the nearest fire-suppression agency of the fire location, action taken, and status (see Section 4.0).
- Immediately notify the Contractor and IPC of the fire location and action taken.
- Relinquish fire-suppression activities to agency fire-management officers upon their arrival.

If a reported fire is controlled, the Contractor and IPC will note the location and monitor the progress in extinguishing the fire. A Contractor's or IPC's employee will remain at the fire scene until it is fully extinguished. The extinguished fire will be monitored in accordance with procedures described in Section 2.3 of this document.

IPC acknowledges and understands the responsibilities of the landowner and operator for fire suppression on lands protected by ODF as referenced in ORS 477.064 through 477.125.

2.2 Restricted Operations

The Contractor and IPC will restrict or cease operations in specified locations during fire season at the direction of the land-management agency's closure order. Restrictions may vary from stopping certain operations at a given time to stopping all operations. IPC may obtain approval to continue some or all operations if acceptable precautions are implemented. A written waiver must be issued to the Contractor and IPC.

During periods of high fire danger, the Contractor and IPC will monitor daily for local restrictions. Restrictions are unique to each agency and are triggered by federal and state agency administration. As discussed in Section 1.2, the agencies' activities (including restrictions) are closely coordinated, primarily through the Pacific Northwest Wildfire Coordinating Group. It is the Contractor's and IPC's responsibility to ensure personnel are aware of and following area fire orders.

Notifications

Construction crew members will report all fires, whether extinguished or controlled. If the fire is uncontrolled, the Contractor will call the nearest fire-suppression agency (911) and the IPC inspector. Information regarding the location of the fire, property ownership, and closest access roads should be reported to 911 and IPC.

If a reported fire is controlled but not extinguished, the Contractor or IPC inspector will call to notify the nearest police/fire authorities using the non-emergency telephone line to alert them of the situation.

IPC will maintain and provide the Contractor with an up-to-date list of landowner and land management agency contacts along the transmission line ROW.

2.3 Monitoring

The contractor will be responsible for compliance with all provisions of this Plan. In addition, federal, state, and local fire-control agencies may perform inspections in areas under their jurisdiction at their discretion.

3.0 OPERATION AND MAINTENANCE

3.1 Operation

During transmission line operation, the risk of fire danger is minimal. The primary causes of fire on the ROW result from unauthorized entry by individuals for recreational purposes and from fires started outside the ROW. In the latter case, authorities can use the ROW as a potential firebreak or point of attack. During transmission line operation, access to the ROW will be restricted in accordance with jurisdictional agency or landowner requirements to minimize recreational use of the ROW.

A contact number directly to Idaho Power's 24/7 dispatch center will be provided to all necessary agencies for notification purposes. Upon being notified of a fire, Idaho Power dispatch will gather as much information as possible and immediately dispatches appropriate personnel to monitor the fire and/or coordinate with onsite emergency agencies.

Once onsite, and if requested, Idaho Power personnel will confirm facilities to be removed from service for safety of fire personnel and communicates this back to Idaho Power dispatch. Idaho Power dispatch then removes the line from service, relaying that information to the Idaho Power onsite personnel, who in turn communicates the condition to onsite emergency agencies.

Response time will vary, based on initial notification times to Idaho Power dispatch. Once onsite, Idaho Power personnel requesting a line outage for safety concerns can expect a line outage within a few minutes. The line would then be considered unavailable to return to service until onsite Idaho Power personnel are able to verify with onsite emergency agencies that all personnel and equipment are no longer in danger of electrical contact.

IPC offers a free on line training course for emergency responders, *Responding to Utility Emergencies*, <https://idaho-power.rtueonline.com/>, which will help emergency responders learn how to recognize potential hazards involving electricity. This training will also address necessary guidelines that help ensure the safety of responders and the general public.

3.2 Maintenance

During maintenance operations, IPC or its Contractor will equip personnel with basic fire-fighting equipment, including fire extinguishers and shovels as described in Section 2.1.5, Equipment. Maintenance crews will also carry emergency response/fire control phone numbers.

IPC and/or a Contractor will implement the following measures during maintenance activities:

- Conduct inspections of the vehicle undercarriage before entering or exiting the project area to clear vegetation that may have accumulated near the vehicle's exhaust system.
- During BLM's Stage II Fire Restrictions, obtain an appropriate waiver and take appropriate precautions when conducting routine maintenance activities that involve an internal combustion engine, involve generating a flame, involve driving over or parking on dry grass, involve the possibility of dropping a line to the ground, or involve explosives. Precautions include a Fire Prevention Watch Person who will remain in the area for one hour following the cessation of that activity.

Vegetation Management

Trees growing into or near power lines are a concern for IPC because they can create safety and service reliability risks. Branches touching power lines can spark and start fires and cause interruptions in electric supply. Therefore, IPC will conduct vegetation management within the Project ROW to reduce the potential for vegetation to come into contact with the transmission

line. Vegetation management will be conducted in accordance with the Project's vegetation management plan (Exhibit P1, Attachment P1-4). In addition, transmission line protection and control systems will be incorporated into the system and are designed to detect faults (such as arcing from debris contacting the line) and will rapidly shut off power flow (in 1/60th to 3/60th of a second) if arcing is detected.

4.0 LITERATURE CITED

ODEQ (Oregon Department of Environmental Quality). 2003. Oregon Natural Hazards Mitigation Plan. Revised August 19. Available online at:
<http://www.deq.state.or.us/aq/burning/wildfires/neap/appendixD.pdf>

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