



Oregon

Tina Kotek, Governor



550 Capitol St. NE
Salem, OR 97301
Phone: 503-378-4040
Toll Free: 1-800-221-8035
FAX: 503-373-7806
www.oregon.gov/energy

To: Energy Facility Siting Council

From: Sarah Esterson, Senior Policy Advisor, Oregon Department of Energy Siting Division

Date: July 3, 2025

Subject: Agenda Item J (Information and Action Item): Boardman to Hemingway Transmission Line: Preconstruction compliance verification and construction status update; and review of changes to the Construction Fire Prevention and Suppression Plan for the July 18, 2025 EFSC Meeting

Attachments: Attachment 1: ODOE's Preconstruction Compliance Verification Letter
Attachment 2: Draft Amended Fire Prevention and Suppression Plan

PRECONSTRUCTION COMPLIANCE UPDATE

The Council issued the Second Amended Site Certificate for the Boardman to Hemingway Transmission Line on August 23, 2024. The site certificate contains numerous requirements that must be satisfied prior to construction. IPC initiated preconstruction compliance in October 2023, where the Department and its consultant (Haley-Aldrich) have been reviewing, in coordination with applicable state and local government agencies, the adequacy of information in satisfying applicable preconstruction requirements. On June 19, 2025, IPC submitted a request for preconstruction compliance verification for specific structures, access roads and one multi-use area (MUA) in Malheur County. The structures include: 211/3 to 214/3; 241/2 to 247/1; and MUA-02. On June 25, 2025, the Department issued a preconstruction compliance verification letter affirming that all conditions applicable to structures 211/3 to 214/3; 241/2 to 247/1; the associated structure roads; and MUA-02 in Malheur County, were satisfied.

CONSTRUCTION STATUS AND SCHEDULE

IPC intends to initiate construction in the approved areas with week of July 7, 2025.

PROPOSED AMENDED FIRE SUPPRESSION AND MITIGATION PLAN

On April 28, 2025, IPC submitted a request to amend the First Suppression and Mitigation Plan (FSMP). The FSMP is required by the Site Certificate, under Condition GEN-PS-02. The FSMP and condition allow for the plan to be amended, subject to Council review for concurrence, modification or rejection.

The FSMP establishes, among many other components, restrictions on equipment type and operations, communications protocol and response procedures in the event of a fire event.

IPC seeks to amend the FSMP as follows:

- Currently, they are required to ensure that all motor vehicles and equipment carry at least 1 long-handled roundpoint shovel with 8-inch or greater blade; a double-bit ax or Pulaski. They want to change this to apply only to motor vehicles approved for highway travel.
- Currently, they are required to ensure that all motor vehicles and equipment have a 16-20 lb dry chemical fire extinguisher. They want to change this to a 5-10 lb dry chemical fire extinguisher, applicable only to motor vehicles approved for highway travel.
- Currently, they are required to ensure that all motor vehicles and equipment are equipped with 20-50 gallons of water with a mechanism to spray. They want to change this to 5-gallons of water with a mech to spray, applicable only motor vehicles approved for highway travel. IPC explains that most types of construction equipment are not designed to accommodate safely mounting or carrying certain tools and water tanks (e.g. cement mixers, dozers, excavators, graders, UTVs, etc.)

The Department consulted with local and state emergency responders on the proposed changes. None of the consulted local or state government agencies had concerns with the changes, and state agency (Oregon Department of Forestry) confirmed that the changes were both reasonable and consistent with applicable requirements.