

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit M. Wildfire Prevention and Risk Mitigation

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



Speedway Energy

BGTF Speedway Project LLC

Prepared by



TETRA TECH

1750 S Harbor Way, Suite 400 | Portland, OR 97201

July 2026

Table of Contents

1.0	Introduction.....	1
2.0	Wildfire Risk – OAR 345-022-0115(1)(a)	1
2.1	Analysis Area.....	1
2.2	Baseline Risk – OAR 345-022-0115(1)(a)(A).....	1
2.2.1	Topography	2
2.2.2	Vegetation	2
2.2.3	Existing Infrastructure.....	3
2.2.4	Climate.....	4
2.2.5	Burn Probability	5
2.3	Seasonal Risk – OAR 345-022-0115(1)(a)(B)	5
2.3.1	Precipitation.....	6
2.3.2	Fuel Moisture Content.....	6
2.3.3	Flame Length.....	6
2.4	Areas of Heightened Risk – OAR 345-022-0115(1)(a)(C).....	7
2.5	High-Fire Consequence Areas – OAR 345-022-0115(1)(a)(D)	9
3.0	Sources and Methods – OAR 345-022-0115(1)(a)(E).....	10
4.0	Wildfire Mitigation Plans – OAR 345-022-0115(1)(b)	10
5.0	Conclusion	11
6.0	References	12
7.0	Approval Standards and Submittal Requirements	13

List of Tables

Table M-1. Slope.....	2
Table M-2. Fuel Models	3
Table M-3. Summary of Monthly Normal Temperature and Precipitation at Moro, OR (1991 – 2020)	4
Table M-4. Burn Probability.....	5
Table M-5. Average Flame Length	7
Table M-6. Expected Risk to Infrastructure.....	8
Table M-7. Expected Risk to People and Property.....	8
Table M-8. Integrated Expected Wildfire Risk	9
Table M-9. Approval Standards and Submittal Requirements Matrix.....	13

List of Figures

Figure M-1. Slope

Figure M-2. Fuel Models

Figure M-3. Burn Probability

Figure M-4. Average Flame Length

Figure M-5. Wildfire Risk to Infrastructure

Figure M-6. Wildfire Risk to People and Property

Figure M-7. Overall Wildfire Risk

List of Attachments

Attachment M-1. Draft Construction Wildfire Mitigation Plan

Attachment M-2. Draft Operational Wildfire Mitigation Plan

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
°F	Fahrenheit
Applicant	BGTF Speedway Project LLC
BPA	Bonneville Power Administration
CWPP	Community Wildfire Protection Plan
Facility	Speedway Energy Facility
FM	fuel model
kV	kilovolt
LLC	limited liability company
OAR	Oregon Administrative Rules
OR-#	Oregon Route [designation]
POI	point of interconnection
RFPD	Rural Fire Protection District
US-#	U.S. Route [designation]

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes construction and operation of the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located on privately owned land in unincorporated Sherman County, Oregon. The Facility's proposed point of interconnection to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary.

The information contained herein supports demonstration of compliance with the Wildfire Prevention and Risk Mitigation approval standard for Oregon Administrative Rules (OAR) 345-022-0115.

2.0 Wildfire Risk – OAR 345-022-0115(1)(a)

(1) To issue a site certificate, the Council must find, by way of supporting evidence from the applicant, that:

(a) The applicant has adequately characterized wildfire risk within the analysis area using current data from reputable sources, by identifying:

2.1 Analysis Area

Per OAR 345-001-0010(35)(c), the wildfire analysis area includes the site boundary (23,936 acres) for the Facility and a 5-mile buffer area around the site boundary (wildfire analysis area; 63,122 acres). US-97 runs through the middle of the wildfire analysis area and OR-216 runs through the western portion of the wildfire analysis area. The wildfire analysis area is generally bounded by Interstate 84 to the north, the John Day River to the east, US-97 to the south, and US-197 to the west. The site boundary is defined in detail in the Background Information Exhibit.

2.2 Baseline Risk – OAR 345-022-0115(1)(a)(A)

(A) Baseline wildfire risk, based on factors that are expected to remain fixed for multiple years, including but not limited to topography, vegetation, existing infrastructure, and climate;

The Sherman County Multiple-Jurisdictional Natural Hazards Mitigation Plan describes a countywide risk assessment of wildfire as “high” probability and identifies many areas in the county as “conducive for large and fast-moving wildfires” due to high winds typical for regional dry conditions and terrain. The plan identifies risk factors for starting wildfires in the County as highways, railroads, lighting, power lines, debris burning, and equipment (Sherman County 2024). Site characteristics suggest the baseline wildfire risk within the Facility site boundary and wildfire analysis area is moderate, based on the existing vegetation, relatively flat overall

topography and slopes, existing infrastructure, and semi-arid climate (NPS 2019). The following subsections describe the risks of wildfire for the Facility site boundary and wildfire analysis area in further detail.

2.2.1 Topography

The wildfire analysis area is primarily flat with some hilly areas. The majority (99 percent) of the wildfire analysis area has slopes that range from 0 to 25 degrees (Table M-1, Figure M-1). As shown on Figure M-1, slopes in the southwestern portion of the wildfire analysis area increase to 25 to 50 degrees due to some steeper hills.

Table M-1. Slope

Slope (degrees)	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
0-25	99	62,617	100	23,936
25-50	1	504	0	0
50-75	0	0	0	0
Total	100%	63,122	100%	23,936

2.2.2 Vegetation

As discussed in Exhibit G, habitat categorization and special status wildlife surveys were performed within the majority of the site boundary in 2024 through 2026 (Exhibit G, Attachment G-1). The landscape within the botanical Survey Area was composed of agriculture, eastside grasslands and planted grasslands (identified by landowners as Conservation Reserve Program lands), low rabbitbrush shrubland, and sagebrush shrub-steppe with a small component of wetlands and stream features.

The broad fuel model groups (reflective of vegetation type) are derived from data from the Community Wildfire Protection Plan (CWPP) Planning Tool (Oregon Explorer 2025). Fuel model groups within the wildfire analysis area consist almost entirely of grass with small amounts of fine, dead fuel, and shrubs. As shown on Figure M-2 and described below in Table M-2, the majority of the vegetation within the site boundary is Fuel Model (FM) 102 – Low Load, dry climate grass (32 percent) and FM 242 – burnable wheat fields (identical to FM 102) (25 percent). Within the wildfire analysis area, the most prominent FMs are also FM 102 (34 percent) and FM 242 (24 percent). A further discussion of FMs is provided in Section 2.3.2.

Table M-2. Fuel Models

Fuel Model #	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
91	0	1	0	0
93	1	452	1	277
98	0	83	0	69
99	0	12	0	4
101	8	4,841	7	1,774
102	34	21,656	32	7,570
103	0	0	0	0
121	2	1,570	2	419
122	10	6,522	11	2,577
123	12	7,501	12	2,921
141	0	70	0	44
142	5	3,405	7	1,717
143	0	27	0	9
161	0	35	0	11
162	0	62	0	7
181	0	82	0	3
182	0	136	0	53
183	0	19	0	5
185	0	1	0	0
188	0	1	0	1
242	24	15,398	25	6,064
251	0	70	0	4
252	2	1,176	2	406
Total	100%	63,122	100%	23,936
Note: All quantities may not result in 100 percent due to rounding adjustments.				

2.2.3 Existing Infrastructure

Existing infrastructure within the site boundary includes residential and agricultural buildings, a 69-kV transmission line, a 230-kV transmission line, and a 500-kV transmission line. The existing BPA 500-kV Ashe-Marion Transmission Line runs northeast/southwest through the site boundary. The existing BPA 230-kV Jones Canyon-Santiam Transmission Line runs adjacent and parallel to the Ashe-Marion line through the site boundary. The 69-kV transmission line runs north/south through the northeastern portion of the site boundary; this transmission line is owned and operated by PacifiCorp.

The City of Grass Valley is located within the wildfire analysis area to the northwest of the site boundary. Within Grass Valley, there are residences, businesses, and public infrastructure including roads, water supply and sewage systems, and another PacifiCorp 69-kV transmission line. There is another BPA 500-kV transmission line located west of the site boundary within the wildfire analysis area. This transmission line runs north to south.

OR-216, US-97, and multiple paved county roads travel through the site boundary. There are several unnamed gravel roads within the Facility site boundary as well. There are no hazardous liquid pipelines or gas transmission pipelines within 10 miles of the wildfire analysis area (NPMS 2025).

2.2.4 Climate

The area has a semi-arid climate. Climate data were used for Moro, Oregon, which is located approximately 4 miles north of the site boundary. Based on available monthly normals of climate data between 1991 and 2020 for Moro, the driest months on average are July, August, and September (NOAA 2025). These months have average monthly precipitation rates of 0.18 inches (July), 0.20 inches (August), and 0.43 inches (September). July, August, and September are also the hottest months of the year with average temperatures of 84.0 degrees Fahrenheit (°F) (July), 83.8 °F (August), and 75.8 °F (September). The total average annual precipitation for Moro is 11.01 inches per year (NOAA 2025), which is indicative of a semi-arid climate (NPS 2019). Additionally, Moro receives approximately 11.3 inches of snow in the winter months, with the coldest month (December) having approximately 5.7 inches of snowfall, an average daily maximum temperature of 39.5 °F, and an average daily minimum temperature of 24.2 °F (Table M-3; NOAA 2025).

**Table M-3. Summary of Monthly Normal Temperature and Precipitation at
Moro, OR (1991 – 2020)**

Month	Max Temp (°F)	Avg Temp (°F)	Precipitation (inch)
January	40.1	32.3	1.47
February	44.9	35.5	1.06
March	52.3	41.2	0.97
April	58.8	46.7	0.96
May	67.4	54.5	0.96
June	74.3	60.7	0.57
July	84.0	68.5	0.18
August	83.8	68.2	0.20
September	75.8	60.6	0.43
October	62.2	49.2	1.06
November	48.4	38.5	1.54
December	39.5	31.8	1.61
Source: NOAA 2025			

2.2.5 Burn Probability

Burn probability is an estimate of the average annual likelihood that a wildfire will occur at any given location and is simulated using a model that integrates information about the physical landscape, historical fire occurrence, and historical weather observations (McEvoy et al. 2023). The burn probability classes range from non-burnable (fuel types such as water, agriculture, or urban) to very high burn probability.

As shown in Table M-4 and on Figure M-3, 79 percent of the wildfire analysis area has a High (1-in-500 to 1-in-100) burn probability. The rest of the wildfire analysis area has a High (1-in-100 to 1-in-50) burn probability, other than 1 percent which is low ($\leq$ 1-in-10,000).

Table M-4. Burn Probability

Burn Probability	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
0	0	92	0	69
Low ($\leq$ 1-in-10,000)	1	541	1	285
Low (1-in-10,000 to 1-in-5,000)	0	0	0	0
Moderate (1-in-5,000 to 1-in-1,000)	0	0	0	0
Moderate (1-in-1,000 to 1-in-500)	0	0	0	0
High (1-in-500 to 1-in-100)	79	50,180	71	17,062
High (1-in-100 to 1-in-50)	20	12,310	27	6,521
Very High (1-in-50 to 1-in-25)	0	0	0	0
No Data	0	0	0	0
Total	100%	63,122	100%	23,936
Note: All quantities may not result in 100 percent due to rounding adjustments.				

2.3 Seasonal Risk – OAR 345-022-0115(1)(a)(B)

(B) Seasonal wildfire risk, based on factors that are expected to remain fixed for multiple months but may be dynamic throughout the year, including but not limited to, cumulative precipitation and fuel moisture content;

Seasonal wildfire risk was assessed based on factors that are anticipated to remain consistent for several months but may vary throughout the year and over time. These factors include annual and monthly cumulative precipitation levels, weather advisories (including fuel moisture content data), and average flame length (the average length of flames expected during a fire given local fuel and weather conditions). The seasonal wildfire risk within the site boundary and wildfire analysis area is low for most of the year, but moderate to high in the summer months based on the warmer semi-

arid climate, moderate average flame lengths, high burn probability, and low average rainfall during the summer months.

2.3.1 Precipitation

See Section 2.2.4 and Table M-3 for a discussion of precipitation within the wildfire analysis area.

2.3.2 Fuel Moisture Content

Fuel moisture content is a primary variable when observing wildfire behavior. Fuel moisture content “is a measure of the amount of water in a fuel (vegetation) available to a fire and is expressed as a percent of the dry weight of that specific fuel” (NOAA 2024b). Fuel moisture content varies with weather, both seasonally and during short periods. The higher the fuel moisture content, the greater difficulty for fires to ignite and propagate. Living plants and dead fuels respond differently to weather changes; the drying and wetting processes of dead fuels is such that the moisture content of these fuels is strongly affected by weather changes. These moisture contents are influenced by precipitation, air moisture, air and surface temperatures, wind, cloudiness, as well as by fuel factors such as surface to volume ratio, compactness, and arrangement. Fuel moisture content within the wildfire analysis area and Facility site boundary is dependent on current weather conditions, fuel moisture data, and seasonal weather patterns.

Fuel moisture varies with vegetation type. For instance, annual grasses are highly flammable whereas broadleaf vegetation is less flammable (USFS 1970). Additionally, live evergreen trees and shrubs can burn despite having a moisture content of over 100 percent.

Fuel model groups within the wildfire analysis area consist almost entirely of grass with small amounts of fine, dead fuel, and shrubs. As shown on Figure M-2 and described above in Table M-2, the majority of the vegetation within the site boundary is Fuel Model (FM) 102 – Low Load, dry climate grass (32 percent) and FM 242 – burnable wheat fields (identical to FM 102) (25 percent). Within the wildfire analysis area, the most prominent FMs are also FM 102 (34 percent) and FM 242 (24 percent). The primary carriers of fire in FM 102 are grass and small amounts of dead fuel. If shrubs are present, they typically do not affect fire behavior. During the hot summer months, the fuel moisture content in these areas is typically low.

2.3.3 Flame Length

Fire intensity, measured by average flame length, shows the average length of flames expected, given local fuel and weather conditions (Oregon Explorer 2025). Flame lengths have potential to exceed the mapped values shown, even under normal weather conditions. Flame length is commonly used as a direct visual indication of fire intensity and is a primary factor to consider for firefighter safety and for gauging potential impacts to resources and assets.

As shown in Table M-5 and Figure M-4, 70 percent of the wildfire analysis area and 74 percent of the site boundary have an average flame length of 2 to 4 feet. These flame heights, typical of dryland grasses and burnable wheat fields, can spread quickly in dry, hot conditions when fueled by wind.

Four percent of the wildfire analysis area and 2 percent of the Site Boundary have average flame lengths of 8-12 feet. As shown on Figure M-4, the small areas that have higher flame lengths are located in the southeast and northeast portions of the wildfire analysis area.

Table M-5. Average Flame Length

Average Flame Length (feet)	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
0-2	11	6,889	11	2,579
2-4	70	44,039	74	17,818
4-6	7	4,577	2	540
6-8	8	5,121	10	2,468
8-12	4	2,398	2	463
>12	0	5	0	0
No Data	0	93	0	69
Total	100%	63,122	100%	23,936
Note: All quantities may not result in 100 percent due to rounding adjustments.				

2.4 Areas of Heightened Risk – OAR 345-022-0115(1)(a)(C)

(C) Areas subject to a heightened risk of wildfire, based on the information provided under paragraphs (A) and (B) of this subsection;

Areas of heightened risk are described using the CWPP Planning Tool “Wildfire Risk to Individual Highly Valued Resources” and specifically “Wildfire Risk to Infrastructure and People and Property” (Oregon Explorer 2025). Wildfire Risk to Infrastructure represents the conditional wildfire risk to critical infrastructure; namely energy, communication, transportation infrastructure, as well as other essential facilities. Wildfire Risk to People and Property represents the wildfire risk to residential and non-residential structures. The risk assessment framework assumes that there are no beneficial impacts of wildfire on infrastructure or structures and so risk is characterized only by the degree of expected loss.

As discussed in Section 2.2.3, existing infrastructure within the wildfire analysis area includes residential, commercial, and agricultural buildings, two 69-kV transmission lines, and two 500-kV transmission lines. The City of Grass Valley is located within the wildfire analysis area. Therefore, there is an increased amount of existing infrastructure located north of the site boundary. Note that the majority of the site boundary and wildfire analysis area do not have high value assets or resources including infrastructure; this is represented under the “no data” risk rating. As shown on Figure M-5, the only areas that have infrastructure data available are OR-216, US-97, and where there are existing transmission lines. As shown in Table M-6, the small percent of areas with a high expected risk in the wildfire analysis area are the 500-kV transmission lines.

Table M-6. Expected Risk to Infrastructure

Expected Risk	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
Very High	0	12	0	0
High	3	1,579	3	686
Moderate	1	469	1	272
Low	3	1,810	4	872
Non-Burnable/Very Low	0	0	0	0
No Data ¹	94	59,252	92	22,106
Total	100%	63,122	100%	23,936
Note: All quantities may not result in 100 percent due to rounding adjustments.				
1. There are no high value assets or resources, including infrastructure.				

As shown on Figure M-6, the majority of the site boundary and wildfire analysis area do not have high value assets or resources including residential and non-residential structures; this is represented under the “no data” risk rating. However, the areas with data available within the wildfire analysis area show areas with moderate to very high loss (Table M-7). These areas generally have residential, agricultural, or commercial buildings. As shown in Figure M-6, the City of Grass Valley has more existing infrastructure and is showing a high loss if a wildfire were to occur.

Table M-7. Expected Risk to People and Property

Expected Risk	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
Very High	1	475	1	122
High	1	622	1	224
Moderate	0	13	0	4
Low	2	1,080	2	385
Non-Burnable/Very Low	0	0	0	0
No Data	97	60,932	97	23,201
Total	100%	63,122	100%	23,936
Note: All quantities may not result in 100 percent due to rounding adjustments.				
1. There are no high value assets or resources, including residential and non-residential structures.				

2.5 High-Fire Consequence Areas – OAR 345-022-0115(1)(a)(D)

(D) High-fire consequence areas, including but not limited to areas containing residences, critical infrastructure, recreation opportunities, timber and agricultural resources, and fire-sensitive wildlife habitat; and

The CWPP data on wildfire risk (Figure M-7) are used to identify high-fire consequence areas (Oregon Explorer 2025). Integrated Expected Wildfire Risk is a representation of cumulative risk at any location based on which highly valued resources and assets (HVRAs) are present, fire intensity, and the likelihood of a fire occurring (burn probability). The integrated risk maps synthesize risk across all resources and assets present at a specific location and the result is either net beneficial or net adverse impacts. Areas that do not have data available represent that not all resources and assets are present at every location, and the integrated wildfire risk class at a specific location reflects only the resources and assets located there.

The percentages of the site boundary and the wildfire analysis area that fall into each Fire Risk Rating are shown in Table M-8 and displayed on Figure M-7. The site boundary has a 34 percent high loss rating, 27 percent moderate loss rating, and 21 percent low loss rating. As shown on Figure M-7, areas of high loss are spread throughout the site boundary. These areas are typically where there is existing infrastructure like transmission lines, roads, residences, and agricultural buildings. Additionally, some of these areas with higher loss ratings also are tilled and used for cattle grazing.

The wildfire analysis area has a 32 percent high loss rating, 26 percent moderate loss rating, and 21 percent low loss rating. Similarly to the site boundary, areas of moderate to high loss generally have existing infrastructure present (Figure M-7). A small percentage of the wildfire analysis area and site boundary (3 percent) has a very high loss rating. As shown on Figure M-7, these areas are where there are existing 500-kV transmission lines located.

Table M-8. Integrated Expected Wildfire Risk

Overall Fire Risk Rating	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
Very High Loss	3	1,677	3	682
High Loss	32	20,343	34	8,167
Moderate Loss	26	16,427	27	6,364
Low Loss	21	13,106	21	5,014
Neutral	3	1,944	3	698
Low Benefit	2	1,064	1	282
Moderate Benefit	2	1,169	2	373
High Benefit	0	43	0	6

Overall Fire Risk Rating	Percent of Wildfire Analysis Area	Acres of Wildfire Analysis Area	Percent of Site Boundary	Acres of Site Boundary
No Data ¹	12	7,349	10	2,350
Total	100%	63,122	100%	21,936
Note: All quantities may not result in 100 percent due to rounding adjustments. 1. There are no highly valued resources or assets (such as critical infrastructure, developed recreation, or housing unit density) mapped in the area, or simulated wildfires did not burn the area due to low historical occurrence/absence of burnable fuel.				

3.0 Sources and Methods – OAR 345-022-0115(1)(a)(E)

(E) All data sources and methods used to model and identify risks and areas under paragraphs (A) through (D) of this subsection.

Data from the CWPP Planning Tool (Oregon Explorer 2025) were used for the analyses provided in response to OAR 345-022-0115(1)(a) in Sections 2.1 through 2.4 of this exhibit. The CWPP tool provides a range of data for fire behavior and effects to help communities assess wildfire risk in their area.

The following 2025 Oregon CWPP datasets were used throughout this analysis (Oregon Explorer 2025):

- Burn probability;
- Average flame length;
- Integrated Expected Wildfire Risk;
- Slope;
- Fuel models;
- Wildfire Risk to Infrastructure; and
- Wildfire Risk to People and Property.

Additionally, the Sherman County Multiple-Jurisdictional Natural Hazards Mitigation Plan was used to review the baseline fire risk in Sherman County (Sherman County 2024).

4.0 Wildfire Mitigation Plans – OAR 345-022-0115(1)(b)

(b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum:

(A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis;

(B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section;

(C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;

(D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and

(E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.

Draft Construction and Operational Wildfire Mitigation Plans are included as Attachments M-1 and M-2 to this exhibit. Section 3.3.9 in Exhibit L – Public Services lists best management practices that could be implemented to minimize fire and safety risks. Section 3.3.9 in Exhibit L also describes that the Facility will not have an impact on the ability of surrounding communities to provide fire protection and emergency response services during construction or operations. Statements from the South Sherman Rural Fire Protection District (RFPD), Moro RFPD, and Sherman County Emergency Services indicated that they had no concerns with Facility construction or operations with respect to providing fire protection and/or emergency services; South Sherman RFPD also provided an additional letter of support for the Facility (see Attachment L-3 to Exhibit L). The provisions of OAR 345-022-0115(1)(b) are satisfied.

5.0 Conclusion

Per the data reviewed and presented here, wildfire risk and consequences of fire in the Facility site boundary are typical for the vegetation type and fire regime encountered in Sherman County. Within the site boundary and wildfire analysis area, assets that could currently be impacted include residential structures, agricultural areas and farming operations, roads, and existing 69-kV and 500-kV transmission lines. If a wildfire did ignite near those assets, they could be at risk. Additionally, the City of Grass Valley also has a higher risk due to the concentrated amount of existing infrastructure. It is anticipated that, due to the existing infrastructure, high burn probability, low expected intensity as measured by average flame length, fuels, weather, and topography, overall fire risk for the proposed Facility would be moderate.

6.0 References

- McEvoy, A., C. Dunn, and I. Rickert. 2023. PNW Quantitative Wildfire Risk Assessment Methods. Unpublished Manuscript.
https://oe.oregonexplorer.info/externalcontent/wildfire/PNW_QWRA_2023Methods.pdf.
- NOAA (National Oceanic and Atmospheric Administration). 2024. Dead Fuel Moisture. Available online at:
<https://www.ncei.noaa.gov/access/monitoring/dyk/deadfuelmoisture#:~:text=Fuel%20moisture%20is%20a%20measure,content%20would%20be%20zero%20percent>
- NOAA. 2025. U.S. Climate Normals Quick Access. Station: Arlington Station USC00350265.
<https://www.ncei.noaa.gov/access/us-climate-normals/#dataset=normals-monthly&timeframe=30&location=OR&station=USC00350265>
- NPMS (National Pipeline Mapping System). 2025. NPMS Public Viewer.
<https://pvnpm.phmsa.dot.gov/PublicViewer/>
- NPS (National Parks Service). 2019. Arid and Semi-arid Region Landforms. Available online at:
[https://www.nps.gov/subjects/geology/arid-landforms.htm#:~:text=Arid%20regions%20by%20definition%20receive,centimeters\)%20of%20rain%20per%20year](https://www.nps.gov/subjects/geology/arid-landforms.htm#:~:text=Arid%20regions%20by%20definition%20receive,centimeters)%20of%20rain%20per%20year).
- Oregon Explorer. 2025. Oregon CWPP Planning Tool.
https://tools.oregonexplorer.info/oe_htmlviewer/index.html?viewer=wildfireplanning
- Sherman County. 2024. Sherman County Multiple-Jurisdictional Natural Hazards Mitigation Plan. chrome-extension://efaidnbmnnnibpcajpcgclefindmkaj/https://storage.googleapis.com/proudcity/shermancountyor/2017/11/ShermanCountyNHMP2024.pdf
- USFS (U.S. Department of Agriculture Forest Service). 1970. A Guide for Application of Meteorological Information to Forest Fire Control Operations: Chapter 11 - Weather and Fuel Moisture. Handbook 360. U.S. Department of Agriculture Forest Service. Available online at: <https://www.nwcg.gov/publications/pms425-1/weather-and-fuel-moisture>

7.0 Approval Standards and Submittal Requirements

Table M-9. Approval Standards and Submittal Requirements Matrix

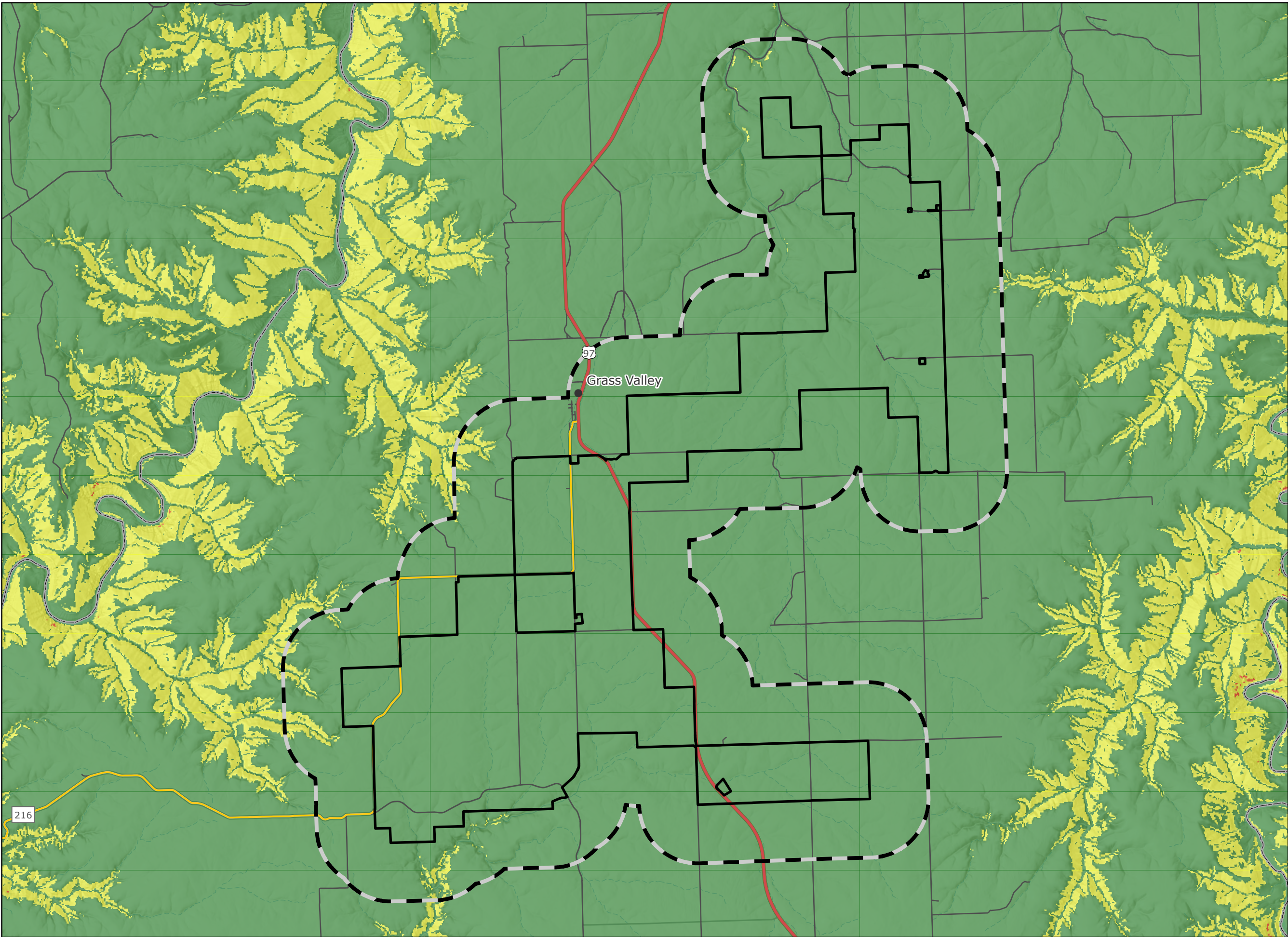
Requirements	Location
OAR 345-022-0115 Wildfire Prevention and Risk Mitigation	–
Submittal Requirements	
(1) To issue a site certificate, the Council must find, by way of supporting evidence from the applicant, that:	–
(a) The applicant has adequately characterized wildfire risk within the analysis area using current data from reputable sources, by identifying:	Section 2.0
(A) Baseline wildfire risk, based on factors that are expected to remain fixed for multiple years, including but not limited to topography, vegetation, existing infrastructure, and climate;	Section 2.2
(B) Seasonal wildfire risk, based on factors that are expected to remain fixed for multiple months but may be dynamic throughout the year, including but not limited to, cumulative precipitation and fuel moisture content;	Section 2.3
(C) Areas subject to a heightened risk of wildfire, based on the information provided under paragraphs (A) and (B) of this subsection;	Section 2.4
(D) High-fire consequence areas, including but not limited to areas containing residences, critical infrastructure, recreation opportunities, timber and agricultural resources, and fire-sensitive wildlife habitat; and	Section 2.5
(E) All data sources and methods used to model and identify risks and areas under paragraphs (A) through (D) of this subsection.	Section 3.0
(b) That the proposed facility will be designed, constructed, and operated in compliance with a Wildfire Mitigation Plan approved by the Council. The Wildfire Mitigation Plan must, at a minimum:	Section 4.0
(A) Identify areas within the site boundary that are subject to a heightened risk of wildfire, using current data from reputable sources, and discuss data and methods used in the analysis;	Section 4.0; Attachments M-1 and M-2
(B) Describe the procedures, standards, and time frames that the applicant will use to inspect facility components and manage vegetation in the areas identified under subsection (a) of this section;	Section 4.0; Attachments M-1 and M-2
(C) Identify preventative actions and programs that the applicant will carry out to minimize the risk of facility components causing wildfire, including procedures that will be used to adjust operations during periods of heightened wildfire risk;	Section 4.0; Attachments M-1 and M-2
(D) Identify procedures to minimize risks to public health and safety, the health and safety of responders, and damages to resources protected by Council standards in the event that a wildfire occurs at the facility site, regardless of ignition source; and	Section 4.0; Attachments M-1 and M-2
(E) Describe methods the applicant will use to ensure that updates of the plan incorporate best practices and emerging technologies to minimize and mitigate wildfire risk.	Section 4.0; Attachments M-1 and M-2
Approval Standards	

Preliminary Application for Site Certificate
Exhibit M. Wildfire Prevention and Risk Management

Requirements	Location
(2) The Council may issue a site certificate without making the findings under section (1) if it finds that the facility is subject to a Wildfire Protection Plan that has been approved in compliance with OAR chapter 860, division 300.	
(3) This Standard does not apply to the review of any Application for Site Certificate or Request for Amendment that was determined to be complete under OAR 345-015-0190 or 345-027-0363 on or before the effective date of this rule.	
EFSC 2-2025, amend filed 04/02/2025, effective 04/02/2025	

Figures

\\tt.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\pASC\Exhibit_M\Brookfield_Speedway_ASC_Exhibit_M_20260128.aprx



Speedway Energy Facility

**Figure M-1
Slope**

SHERMAN COUNTY, OR

- Facility Site Boundary
 - Analysis Area (1 mile buffer)
 - City/Town
 - County Boundary
 - US Highway
 - State Highway
 - Local Roads
- Slope**
- 0 - 25 degrees
 - 25-50 degrees
 - >50 degrees



Reference Map



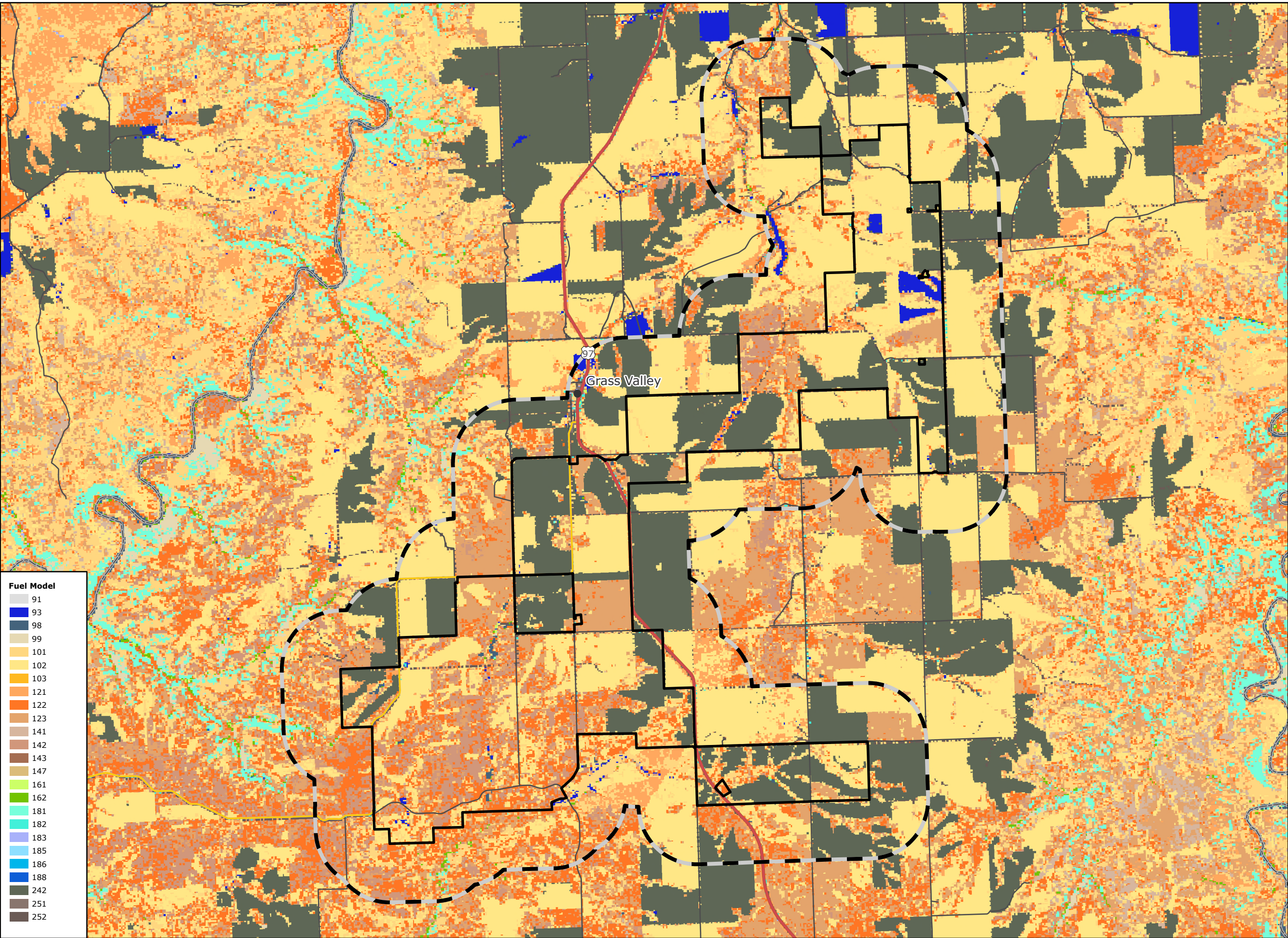
1:100,000

WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

\\t.local\GIS\US\CES\Projects\PDX\Brookfield\Speedway\ASC_Exhibit_M_20260128.aprx



- Fuel Model**
- 91
 - 93
 - 98
 - 99
 - 101
 - 102
 - 103
 - 121
 - 122
 - 123
 - 141
 - 142
 - 143
 - 147
 - 161
 - 162
 - 181
 - 182
 - 183
 - 185
 - 186
 - 188
 - 242
 - 251
 - 252

Speedway Energy Facility

**Figure M-2
Fuel Models**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (1 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads



Reference Map



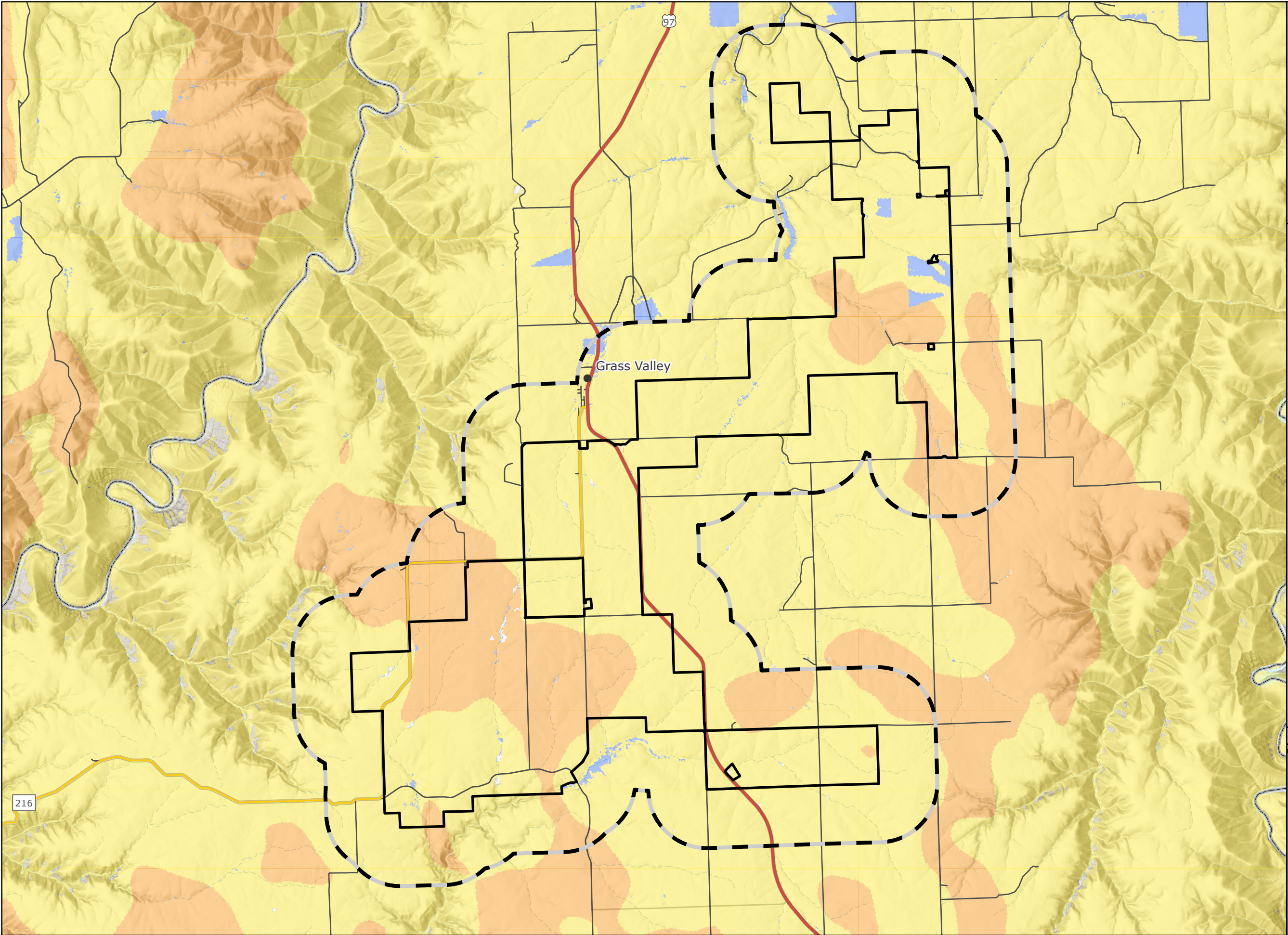
1:100,000

WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

\\t.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\pASC\Exhibit_M_Brookfield_Speedway_ASC_Exhibit_M_20260128.aprx



Speedway Energy Facility

**Figure M-3
Burn Probability**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (1 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads

Burn Probability

- 0
- 0 - 0.0001 Low ($\leq$ 1-in-10,000)
- 0.001 - 0.002 Moderate (1-in-1,000 to 1-in-500)
- 0.002 - 0.01 High (1-in-500 to 1-in-100)
- 0.01 - 0.02 High (1-in-100 to 1-in-50)

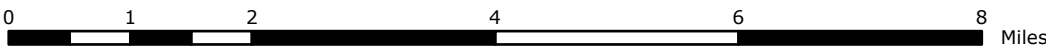


Reference Map



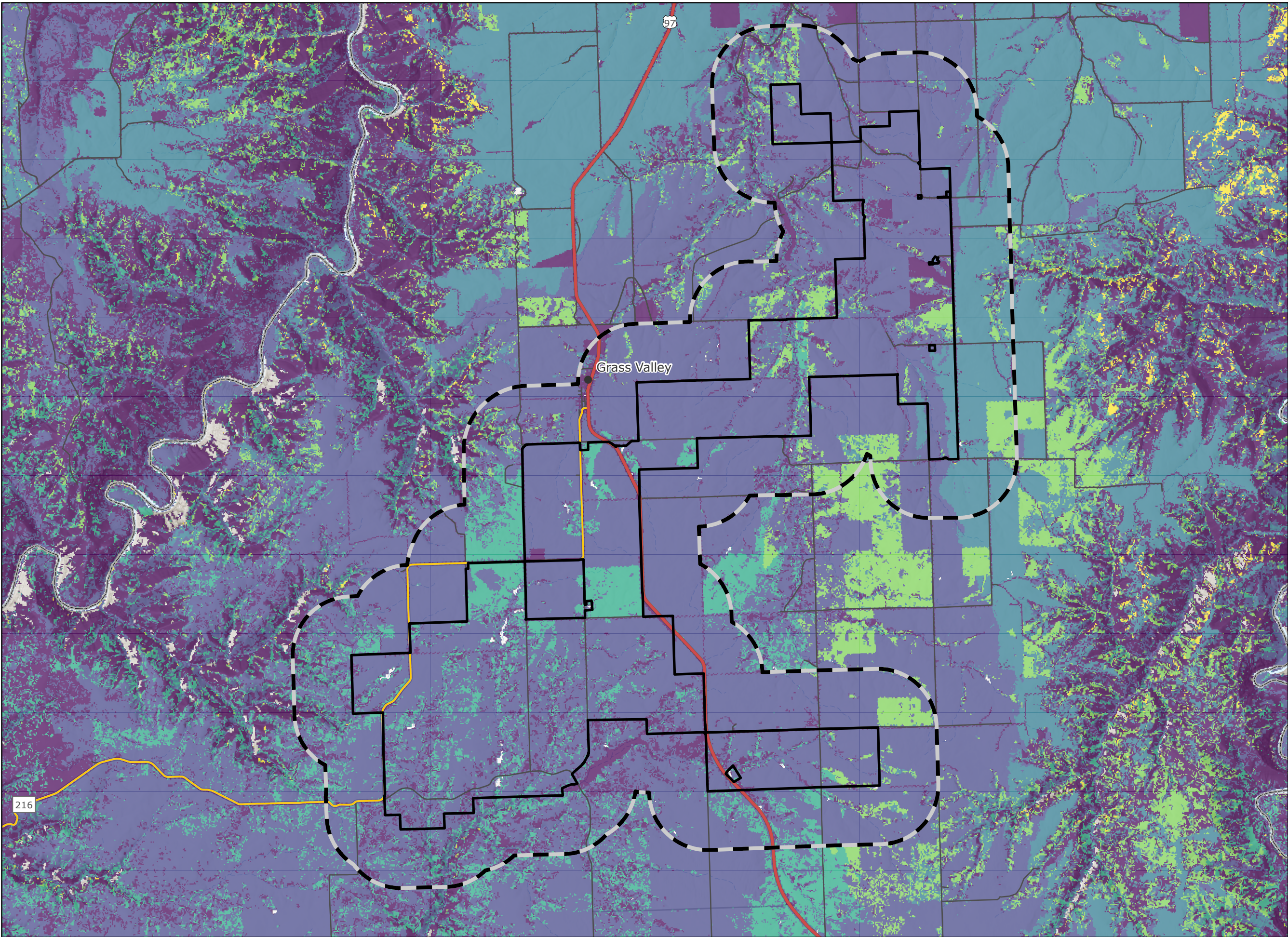
1:100,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

\\tt.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\pASC\Exhibit_M\Brookfield_Speedway_ASC_Exhibit_M_20260128.aprx



**Speedway
Energy Facility**

**Figure M-4
Average Flame Length**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (1 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads

Average Flame Length

- 0 - 2 ft.
- 2 - 4 ft.
- 4 - 6 ft.
- 6 - 8 ft.
- 8 - 12 ft.
- Greater than 12 ft.

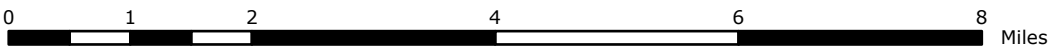


Reference Map



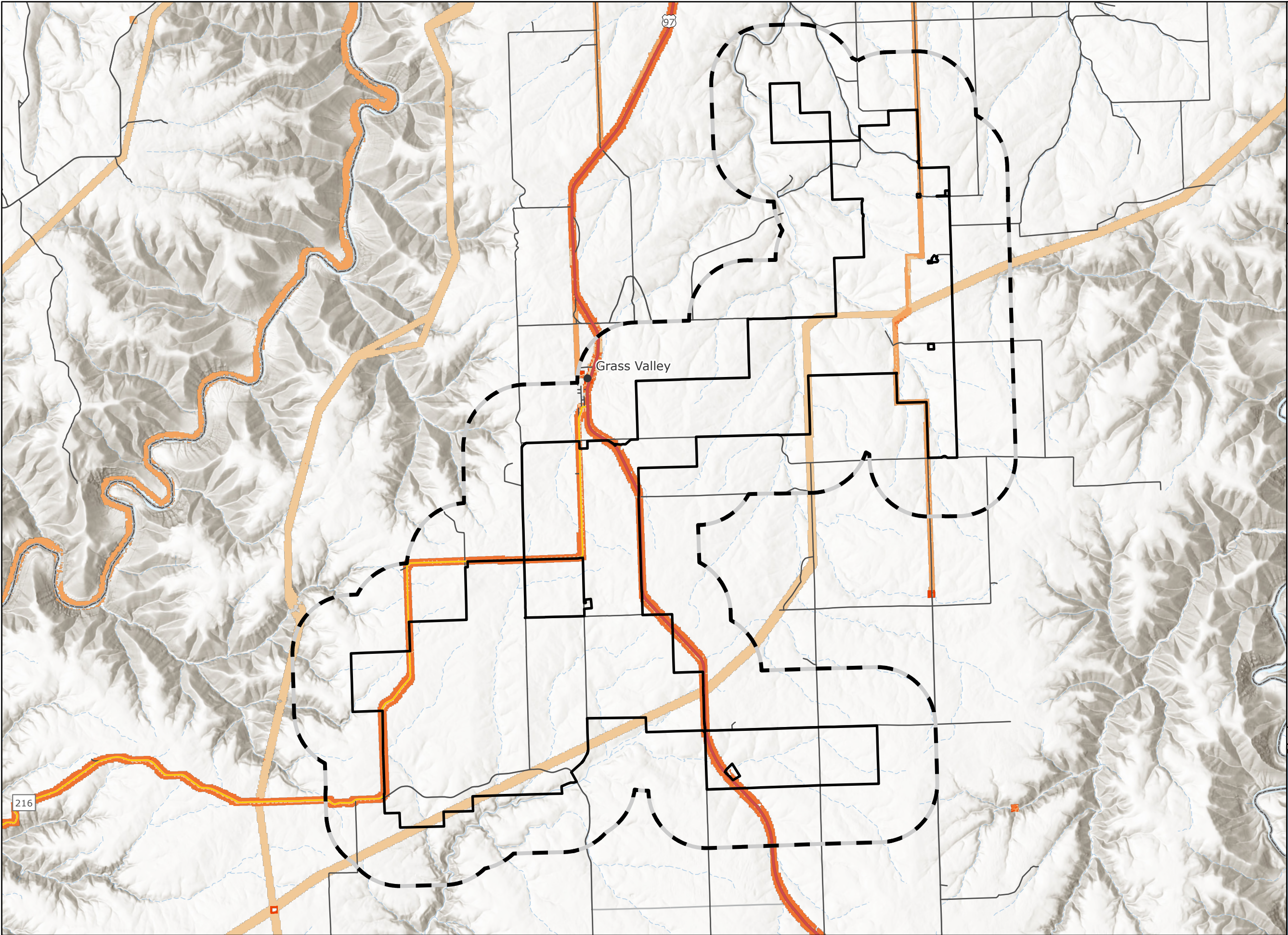
1:100,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

\\t.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\pASC\Exhibit_M\Brookfield_Speedway_ASC_Exhibit_M_20260128.aprx



Speedway Energy Facility

**Figure M-5
Expected Risk
to Infrastructure**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (1 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads

- Expected Risk to Infrastructure**
- Very High Loss
 - High Loss
 - Moderate Loss
 - Low Loss

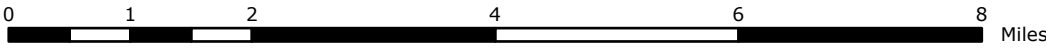


Reference Map



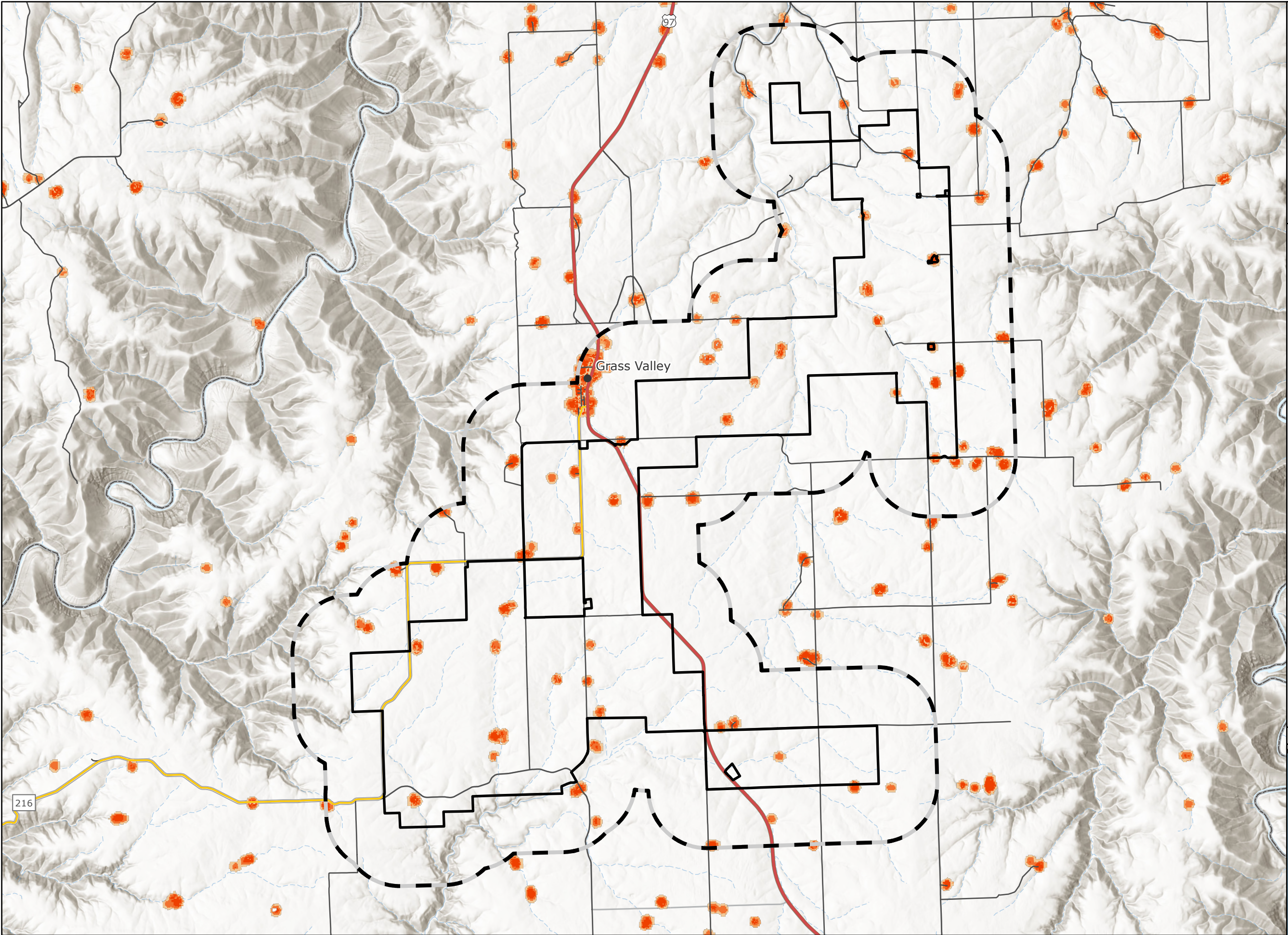
1:100,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

\\t:\local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\ASC_Exhibit_M_20260128.aprx



Speedway Energy Facility

**Figure M-6
Expected Risk to
People and Property**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Analysis Area (1 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads

Expected Risk to People and Property

- Very High Loss
- High Loss
- Moderate Loss
- Low Loss

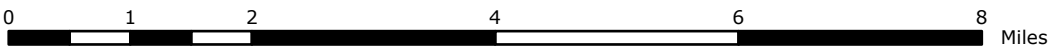


Reference Map



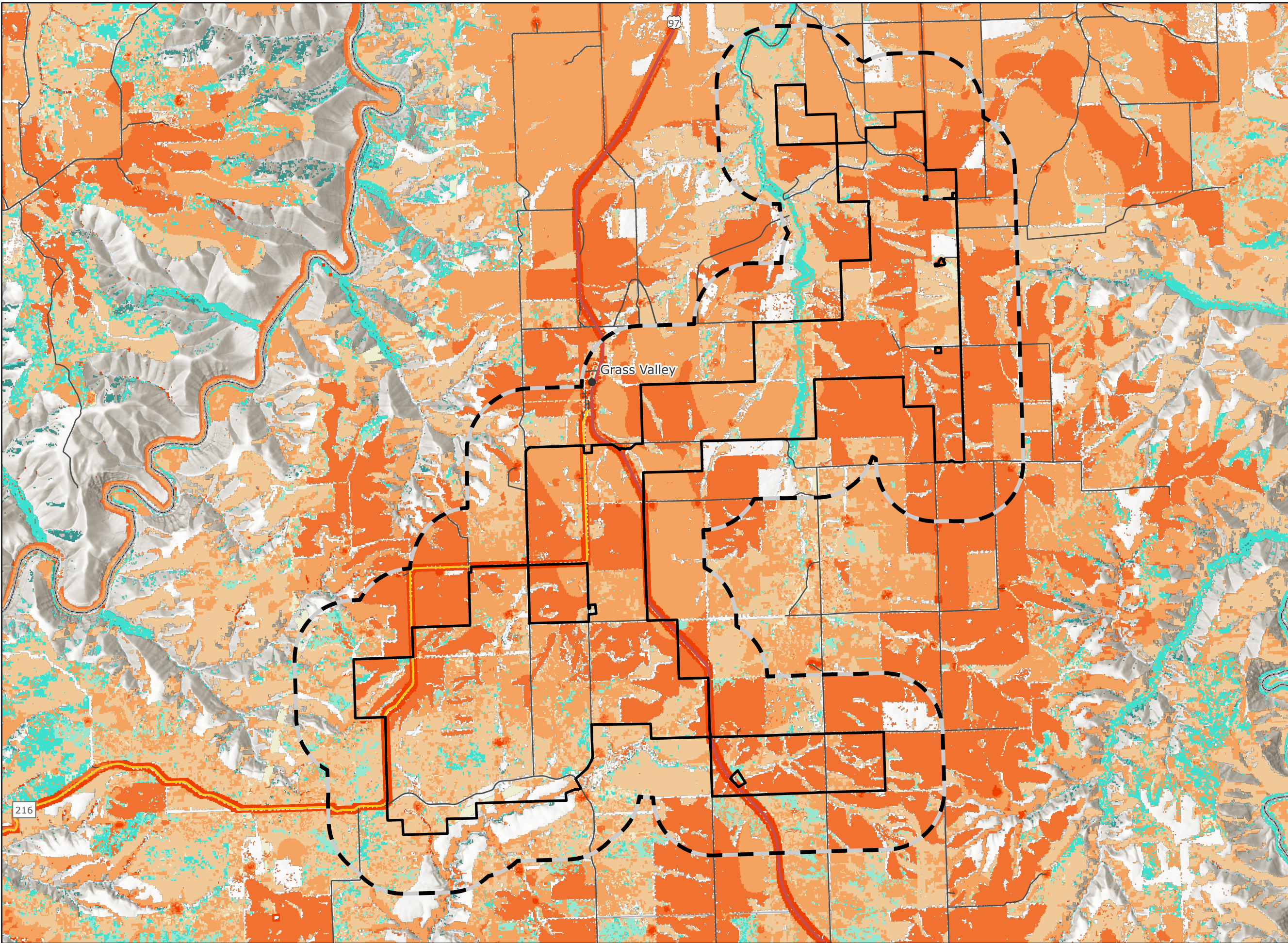
1:100,000

WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

\\t.local\GIS\US\CES\Projects\PD\X\Brookfield\Speedway\Maps\pASC\Exhibit_M\Brookfield_Speedway_ASC_Exhibit_M_20260128.aprx



Speedway Energy Facility

**Figure M-7
Overall Wildfire Risk**

SHERMAN COUNTY, OR

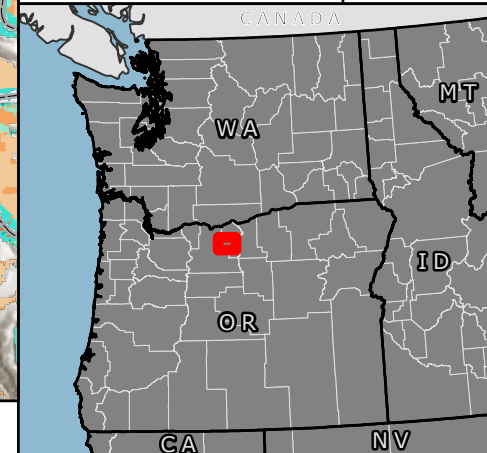
- Facility Site Boundary
- Analysis Area (1 mile buffer)
- City/Town
- County Boundary
- US Highway
- State Highway
- Local Roads

Integrated Expected Wildfire Risk

- Very High Loss
- High Loss
- Moderate Loss
- Low Loss
- Neutral
- Low Benefit
- Moderate Benefit
- High Benefit
- Very High Benefit



Reference Map



1:100,000

WGS 1984 UTM Zone 10N

0 1 2 4 6 8 Miles

NOT FOR CONSTRUCTION

Attachment M-1. Draft Construction Wildfire Mitigation Plan

Draft Construction Wildfire Mitigation Plan

Speedway Energy Facility

Prepared for



BGTF Speedway Project LLC

Prepared by



1750 S Harbor Way, Suite 400 | Portland, OR 97201

July 2026

Table of Contents

Introduction.....	2
1.0 Finalizing Wildfire Mitigation Plan Prior to Construction (PRE).....	2
1.1 Update Applicable Sections of WMP.....	2
2.0 Prior to Construction Task List (PRE).....	3
2.1 Training (PRE):.....	3
2.2 Facility Site Map(s) Submission (PRE):.....	4
3.0 Construction Wildfire Mitigation Plan (CON)	4
3.1 Summary of Construction Phasing.....	4
3.2 Facility Site Map(s):.....	5
3.3 Specifications for Fire Protection Equipment	6
3.4 Facility Contact Information and Emergency Response Procedures.....	6
3.5 Use of Vehicles and Power Driven Machinery at Site	7
3.6 Fire Precaution Levels and Restrictions during Fire Season.....	8
3.7 Vegetation Management.....	11
3.7.1 Vegetation-free, Noncombustible Space, and Vegetation Standards.....	11
3.8 Construction Training(s).....	12
3.8.1 Safety Training	12
4.0 Plan Updates: Amendments and Reporting Requirements:.....	13
5.0 References.....	13

List of Tables

Table 1: Fire Prevention Measures During Fire Season Summary	10
--	----

List of Attachments

Attachment 1. Residence/Landowner Outreach Letter

Draft Construction Wildfire Mitigation Plan

ODOE Template

Instructions for Siting Analyst during review of an ASC/RFA:

- Provide template to applicant/certificate holder. To the extent it can be determined during review of an ASC/RFA, determine facility design features such as setbacks, road widths and locations, vegetation management etc. This information should be reflected in Section 3.0 and should be consistent with the facility description in ASC/RFA exhibits and in other mitigation plans (Noxious Weed Plan, Reveg Plan, and Dust Control Plan).
- Provide WMP to County and fire department(s), and ask if the measures (setbacks, fire protection equipment) are sufficient. If comments indicate or request additional measures, work with analyst team and Senior Policy Advisor to determine if any changes should be made to the WMP.
- Delete this prior to sending to applicant/certificate holder.

Instructions for Applicants and Certificate Holders:

- This template includes preventative actions, procedures, and standards commonly proposed to meet the requirements of OAR 345-022-0115(1)(b) and reflects practices the Department and EFSC have identified as appropriate to minimize wildfire risk at solar photovoltaic power generation facilities. **Use of the template is not required**, and provisions in this template may be modified depending on the type of energy facility under review. Use of the template does not guarantee satisfaction with the Council's Wildfire Prevention and Risk Mitigation Standard. Use of the template does not establish a defense for any enforcement action for violation of a site certificate, Council order or rule. Use of the template or a separately-developed Wildfire Mitigation Plan does not relieve a certificate holder from proactively managing wildfire risk and taking steps to protect against wildfire beyond the measures included in the template or a separately-developed Plan.
- Areas in **yellow highlight** to be updated based on the applicant/certificate holder facility proposal and should be filled out to the extent known at the time of review of the ASC/RFA. This information will also be updated/finalized based on facility design and the construction plan prior to construction of the facility.
- All changes to this template must be made in track changes for the Department to determine the scope of changes made.

Applicable EFSC Site Certificate Conditions

Wildfire Prevention and Risk Mitigation Condition 1 (PRE): Prior to construction of the facility or phase, as applicable, the certificate holder shall:

- a. Finalize the Construction Wildfire Mitigation Plan, as provided in Attachment XX to the Final Order on ASC. The final Construction Wildfire Mitigation Plan shall be submitted to the Department for review and approval.

- b. Complete pre-construction tasks and actions designated in the Construction Wildfire Mitigation Plan approved under sub a of PRE-WF-01.

[PRE-WF-01, Final Order on ASC]

Wildfire Prevention and Risk Mitigation Condition 2 (CON): During construction of the facility or phase, as applicable, the certificate holder shall:

- a. Implement and require all onsite contractors and employees to adhere to, the Construction Wildfire Mitigation Plan required under PRE-WF-01.
- b. After the first six months of construction; and then semi-annually during construction, review and update Construction Wildfire Mitigation Plan as designated in the Plan, and submit the results in the semi-annual construction report.
- c. Updates to the Wildfire Mitigation Plan may be required if determined necessary by the certificate holder, certificate holder's contractor(s) or the Department to address wildfire hazard to public health and safety. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

[CON-WF-01, Final Order on ASC]

Introduction

BGTF Speedway Project LLC (Applicant) submits this Draft Construction Wildfire Mitigation Plan (WMP) as part of the Application for Site Certificate for the Speedway Energy Facility. The facility incorporates wind, solar, and battery energy storage, and is located on privately owned land in unincorporated Sherman County, Oregon.

This plan utilizes the template provided by the Oregon Department of Energy (ODOE) on December 10, 2025, and includes preventative actions, procedures, and standards commonly proposed to meet the requirements of Oregon Administrative Rules (OAR) 345-022-0115(1)(b) and reflects practices that ODOE has identified as appropriate to minimize wildfire risk at wind power generation facilities.

1.0 Finalizing Wildfire Mitigation Plan Prior to Construction (PRE)

1.1 Update Applicable Sections of WMP

To finalize this WMP prior to construction of the facility:

- Update Section 3.1 with a summary of construction phasing including vegetation removal and grading based on areas of construction work or facility component.
- Update Section 3.2 and include in this WMP the facility site maps described in Section 3.2.

- Update Section 3.4 with fire department, certificate holder, and operational manager contact information and emergency response procedures. Update Section 3.4 with analysis area residence contact information and confirm analysis area residence contact letter sent to residences within site boundary and 0.5 miles from the facility.
- Update Section 3.7 to describe vegetation management and areas that will be managed to be vegetation-free, noncombustible space, or gravel surfaces.

2.0 Prior to Construction Task List (PRE)

Prior to construction of the facility, complete the activities in Sections 2.1 and 2.2.

2.1 Training (PRE):

Before beginning construction, the certificate holder will hold an on-site training for contractors and construction personnel, inviting specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency. The training will cover:

- Description of construction phasing;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of construction maintenance activities during Fire Season and Red Flag Warnings designated in this Plan;
 - Designation of individual(s) responsible for Fire Watch Service;
 - Designation of individual(s) responsible for checking fire danger/designations for the day.
- Rescue, Alarm, Contain and Extinguish RACE procedures including:
 - Rescue anyone in danger (if safe to do so);
 - Alarm – call the control room, who will then determine if 911 should be alerted;
 - Contain the fire (if safe to do so); and
 - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to sign up for the County’s emergency management notification system.

Training attendee list and training materials must be provided to the Department to demonstrate compliance.

The certificate holder will fill out and submit to the Department the template residence outreach letter provided as Attachment 1 of this WMP. Once Department confirms the letter to be sufficient, the certificate holder will mail to each residence within the 0.5 mile analysis area. Certificate holder will confirm mailing and submit to Department.

2.2 Facility Site Map(s) Submission (PRE):

Submit updated site maps from Section 3.2 concurrently to local fire department(s), County emergency management office, and the Department.

3.0 Construction Wildfire Mitigation Plan (CON)

3.1 Summary of Construction Phasing

Information regarding phased vegetation removal and grading based on areas of construction work/facility components will be provided in a revised final Construction WMP prior to construction.

The Certificate Holder and contractor(s) will maintain vegetation within the Facility site boundary in areas not developed for the Facility and will create and maintain a defensible space clearance around Facility components including solar arrays, collector substations, the central substation, battery energy storage system areas, and O&M areas. Defensible space will be free of combustible vegetation or other materials. Vegetation removal will occur in association with construction of new roads, staging areas, collector lines, solar arrays, wind turbines, collector substations, the central substation, battery energy storage system areas, and O&M areas. Roads and construction parking areas will be maintained to be free of vegetation tall enough to contact vehicle undercarriages .

Prior to construction, staging areas, collector substation areas, battery energy storage system areas, and O&M areas will be cleared and graded, with a bed of crushed rock applied for a durable surface. Post-construction, gravel from staging areas will be removed, and the ground surface regraded to match adjacent contours and reseeded or planted as provided in the Vegetation and Soil Management Plan.

To prevent fires from occurring, the construction contractor will implement a number of systems and procedures within the Facility site boundary. These will include, but not be limited to, the following:

- Hot work (e.g., welding, metal cutting) will be performed in accordance with NFPA 51B and the requirements in the hot work permit issued by the authorized manager for hot work,

- During the dry months of the year, construction vehicles will not be driving on unmowed or unwetted grass, unless such activities are required for emergency purposes, in which case fire precautions will be observed.
- New access roads will be up to 24 feet wide, graveled or paved.
- Maintenance of defensible space clearance, clear of vegetation around construction sites.
- Staging yards, collector substations, the central substation, battery energy storage system areas, and O&M areas will be graveled, with no vegetation present.

3.2 Facility Site Map(s):

As discussed in Exhibit M of the Application for Site Certificate (ASC), overall wildfire risk is used to identify high-fire consequence areas. Overall wildfire risk is shown on Figure M-7 in Exhibit M.

The Facility Layout is provided as Figure 2 in the Background Information Exhibit of the ASC. The Facility Layout identifies solar array areas, wind turbine locations, collector lines, substations, battery energy storage system areas, operations and maintenance areas, construction staging and storage areas, and access roads.

The following information will be verified and provided on a figure included in the revised final Construction WMP prior to construction:

- The phasing for construction, including location of vegetation removal and grading, for Facility features and components;
- Location and dimensions of Facility roads;
- Location of vegetation free, noncombustible, defensible spaces;
- Wildfire risk at the site;
- High-fire consequence areas/resources (includes existing infrastructure, residences, sensitive habitat, or cultural resources);
- The location of Facility access points and gates;
- A description and the location of emergency access procedures, including how emergency responders and/or adjacent landowners may access site for fire protection equipment or to extinguish an on-site fire when personnel will not be onsite (e.g., the Facility will be gated and accessible by access codes. Local fire departments and emergency officials will receive codes to access the Facility in the event of a fire);
- The type and location of fire protection equipment on site;

The location(s) of water source(s) that will be on-site during construction. (e.g., water trucks on site during construction will be staged at the operations and maintenance (O&M) building and moved to locations where construction/hot work will be conducted).

3.3 Specifications for Fire Protection Equipment

The following fire suppression equipment will be carried in vehicles conducting maintenance activities and stored on-site at the O&M building at all times:

- Fire Extinguisher: Dry chemical. 2A:10BC (5 pound), properly mounted or secured;
- Pulaski;
- Hand Shovel: Round point. 26 to 28 in "D" Handle, blade - 12 inches long and 10 inches wide;
- Collapsible Pail or Backpack Pump: 5-gallon capacity; and
- Drip Can: 5-gallon capacity.

During fire season (as designated in this Plan) water truck(s)/water source, water buffalo, or tank with minimum 500-gallon capacity must be on site. The water truck or water supply shall include the following, unless approved by the Department:

- Pump should be maintained ready to operate and capable to provide a discharge of not less than 20 gallons per minute at 115 psi at pump level. Note: Volume pumps will not produce the necessary pressure to effectively attack a fire start. Pressure pumps are recommended.
- Provide enough hose (500 feet minimum) not less than ¾-inch inside diameter to reach areas where power driven machinery has worked.
- Water supply, pump, and at least 250 feet of hose with nozzle must be maintained as a connected, operating unit ready for immediate use.

All internal combustion engines must be equipped with exhaust systems, mufflers and screens, or include an appropriate spark arrestor; and must be kept in good operating condition. All combustion engines (including but not limited to off road vehicles, chainsaws, and generators) will be equipped with a spark arrestor that meets U.S. Forest Service Standard 5100-1.

All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.4 Facility Contact Information and Emergency Response Procedures

Describe fire detection, fire suppression, and emergency procedures that will be implemented in the event of a fire.

Local fire department and county emergency management contact information:

- South Sherman County Rural Fire District:
 - District Fire Chief – Bert Norris: bnorris@southshermanfire.com
 - Phone: (541) 333-2525
- Moro Rural Fire Protection District:
 - District Fire Chief – Joseph Belshe: joseph.belshe@morofire.com

- Phone: (541) 565-3100
- Sherman County Emergency Services:
 - Director – Dana Pursley-Haner: shermanems@shermancounty.net
 - Phone: (541) 565-3100

Fire department response times to the site:

- The Applicant will work with the South Sherman County Rural Fire District and Moro Rural Fire Protection District and Sherman County Emergency Services to determine response times to the site and this information will be included in the final Construction WMP.

Certificate holder primary contact and contact of construction contractor manager(s):

- The construction contractor information will be provided prior to construction.

A list of residences within the site boundary and 0.5 miles of the site boundary is included as an attachment to Exhibit 03 (Noise).

Residence/landowner outreach letter is provided as Attachment 1 of this WMP. Use this letter to provide to new or updated residences with the analysis area as designated in Section 4.0, Plan Updates and Reporting Requirements.

Contact 911 in the event of:

- A fire or emergency on-site that cannot be addressed by personnel on-site and requires the assistance of fire or emergency medical personnel;
- A fire ignition on-site that spreads out of the fence line;
- Any fire off-site that does not have emergency responders on site.
 - To the extent that construction personnel can safely assist and/or provide equipment to help extinguish off-site fires until emergency responders are on site, it is encouraged to do so to assist in the spread of the fire, loss of life, property and damage to the environment.

3.5 Use of Vehicles and Power Driven Machinery at Site

The following best management practices (BMPs) to minimize fire risk from vehicle travel, equipment use, and fueling activities will be implemented at the site during construction:

- The movement of vehicles will be planned and managed to minimize fire risk.
- The contractor(s) will be responsible for identifying approved areas for all off-road vehicle travel. Prior to off-road vehicle travel, tall grasses will be mowed. During fire season, vegetated areas will be mowed or wetted to allow for off-road travel and parking as designated in this plan.
- Areas with grass that are as tall or taller than the exhaust system of a vehicle will be

mowed before vehicles travel through it.

- Workers will be instructed to shut off the engine of any vehicle that gets stuck, and periodically inspect the area adjacent to the exhaust system for evidence of ignition of vegetation. Stuck vehicles will be pulled out rather than “rocked” free and the area will be inspected again after the vehicle has been moved.
- The contractor(s) will designate a location for field fueling operations at the temporary construction yards. Any fueling of generators, pumps, etc. shall take place at this location only.
- Fuel containers, if used, shall remain in a vehicle or equipment trailer, parked at a designated location alongside a county right-of-way. No fuel containers shall be in the vehicles that exit the right-of-way except the five-gallon container that is required for the water truck pump.
- All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.6 Fire Precaution Levels and Restrictions during Fire Season

Definitions:

 **Non-Fire Season** – Approximately October - May

 **Fire Season** – Approximately June-September, formally designated by the Oregon Department of Forestry (ODF). Under ORS 478.960 (4), a Fire Chief can establish Fire Season within a Fire District when ODF, under ORS 477.505, declares Fire Season. Begins seasonal restrictions for public and industry.

 **Fire Weather Watch** - A fire weather watch is issued when there is a high potential for the development of a red flag event. A watch is issued 18 to 96 hours in advance of the expected onset of criteria. Intent of a fire weather watch is to alert forecast users at least a day in advance for the purposes of resource allocation and fire fighter safety. A watch means critical fire weather conditions are possible but not imminent or occurring.

 **Red Flag Weather Warning** - A red flag warning is used to warn of impending or occurring red flag conditions. Its issuance denotes a high degree of confidence that weather and fuel conditions consistent with local red flag event criteria will occur in 48 hours or less. Specific Red Flag criteria differ for each situation and district in Oregon. Be extremely careful with open flames and other activities that emit sparks.

Hot Work - Any cutting, grinding, welding, or other activity that creates spark or open flame. Hot work on site will be conducted in accordance with NFPA 51B and the site's Hot Work Permit system.

Fire Watch Service -

Fire watch shall follow the requirements in NFPA 51B Section 5.6, including:

- Be physically capable and experienced to operate firefighting equipment.
- Have facilities for transportation and communications to summon assistance.
- Observe locations where hot work occurred during the day.

Upon discovery of a fire, fire watch personnel must: First report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities; 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.

Fire-Prevention Measures and Restrictions Associated with Fire Season:

Certificate holder shall maintain a log when construction activities are impacted by Fire Restrictions during Fire Season as designed in this Section. The log will include:

- The date;
- Fire Precaution Level;
- Description of actions taken, including if any measures were taken to reduce wildfire risk that are not identified in this Plan.



Non-Fire Season

- All hot work will be conducted in accordance with the Hot Work Permit issued by the approved hot work manager and NFPA 51B, Standard for Fire Prevention During Welding, Cutting, and Other Hot Work.
- Smoking in designated areas only.



Fire Season

- Before the start of each daily shift, at approximately 07:00 a.m. local time, a designated individual will check the fire danger posting by the National Weather Service for any Red Flag Warnings for that day.
- All hot work will be conducted in accordance with the Hot Work Permit issued by the approved hot work manager and NFPA 51B, Standard for Fire Prevention During Welding, Cutting, and Other Hot Work.
- Water source meeting specifications in this Plan will be on site during fire season.
- Following the completion of hot work, the Certificate Holder or contractor(s) must maintain a fire watch for 60 minutes to monitor for potential ignition. In accordance with the NFPA 51B standards, this period can be shortened to no less than 30 minutes if the fire watch determines the absence of fire hazards or as approved by the authorized hot work manager.
- Fire watch shall be on duty during any breaks and for one hour after the completion of hot work unless fire watch has determined the absence of fire hazard.
- Smoking in designated areas only.



Fire Weather Watch

- Hot work will be performed in areas that have been made fire safe as defined in NFPA 51B. Hot work will be done in accordance with the Hot Work Permit and with NFPA 51B

Standard for Fire Prevention During Welding, Cutting, and Other Hot Work. Examples of making an area fire safe include but are not limited to removing all vegetation, using welding blankets, or wetting an area. The authorized hot work manager will approve hot work based on their assessment of compliance with fire safety.

- Driving and parking are permitted on graveled surfaces and off-road in areas that have been mowed.
- Fire watch shall be on duty during any breaks and for one hour after the completion of hot work unless fire watch has determined the absence of fire hazard.
- No smoking on site.



Red Flag Weather Warning

- Hot work will be performed in areas that have been made fire safe as defined in NHPA 51B. Hot work will be done in accordance with the Hot Work Permit and with NFPA 51B Standard for Fire Prevention During Welding, Cutting, and Other Hot Work. Examples of making an area fire safe include but are not limited to removing all vegetation, using welding blankets, or wetting an area. The authorized hot work manager will approve hot work based on their assessment of compliance with fire safety.
- On-site personnel must be aware of Red Flag Warning.
- Driving and parking are permitted on graveled surfaces and off-road in areas that have been made fire safe.
- Fire watch shall be on duty during any breaks and for one hour after the completion of hot work.
- No smoking on site.

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	Permitted on roads, non-combustible surfaces, or off-road in areas that have been made fire safe.	Permitted on roads, non-combustible surfaces, and off-road areas that have been made fire safe; fire watch required for 60 minutes after completion but may be shortened if fire risk is low	Permitted in areas that have been made fire safe and done in accordance with the Hot Work Permit and NFPA 51B standards.	Permitted in areas that have been made fire safe and done in accordance with the Hot Work Permit and NFPA 51B standards.

Table 1: Fire Prevention Measures During Fire Season Summary

Requirement	 Non-Fire Season	 Fire Season	 Fire Weather Watch	 Red Flag Warning
Fire Watch Service	Not required	During breaks and for 30 to 60 minutes after completion of hot work for the day, depending on fire risk	During breaks and for 30 to 60 minutes after completion of hot work for the day, depending on fire risk	During breaks and for 60 minutes after completion of hot work for the day depending on fire risk.
Driving and Parking	As described in Section 3.5.	As described in Section 3.5.	As described in Section 3.5.	As described in Section 3.5.
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

3.7 Vegetation Management

3.7.1 Vegetation-free, Noncombustible Space, and Vegetation Standards

Vegetation within the fence line and below the solar arrays will be maintained as follows:

- Vegetation will be limited to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment. Vegetation near, at, or taller than the maximum height shall be removed or mowed.
- Mowing must be done in advance of fire season or accordance to any fire restrictions.
- Once the site is energized, vegetation will be removed periodically to avoid contact with electrical equipment
- Once the site is energized, vegetation buildup in the fence line(s), shall be removed periodically.
- Any vegetation removed from the site will be disposed of and not stored onsite. Certificate holder and contractors will prevent the accumulation of combustible “burn piles” on site.

The following areas will be managed to be vegetation-free, noncombustible space, or gravel surface:

- Up to 24-foot-wide service roads – graveled.
- 20-foot noncombustible, defensible space clearance inside fence lines for solar areas and provide an additional 20-foot maintained fire break outside all east-facing fencelines bordering non-participating properties or situated upwind of residences and buildings.

- Within the fenced perimeter of the battery energy storage system areas, collector substations, and central substation will be graveled, similar noncombustible base, or vegetation free.
- Parking and O&M building perimeter - graveled.
- Vegetation along service roads will be managed by mowing or other vegetation removal.

Vegetation in these areas will be managed by the following techniques:

- Mechanical Clearing: mowing, brushing, chipping, tree trimming/felling;
- Manual Clearing: hand tools (chainsaws, machetes, handsaws);
- Chemical Treatment: use of approved herbicides by licensed applicators to control or suppress vegetation growth (broadcast spray, spot treatment, cut-stump/basal bark); and
- Reseeding with low growing, native vegetation.

3.8 Construction Training(s)

3.8.1 Safety Training

Once a year after construction begins, organize and hold an on-site training with certificate holder and construction personnel, inviting equipment manufacturers, specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency that covers:

- The location of electrical facility components and the fire safety measures associated with each component that have been constructed;
- Description of remaining construction phasing;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment usage and maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of construction activities during Fire Season, Fire Weather Watches, and Red Flag Warnings designated in this Plan;
 - Designation of individual(s) responsible for Fire Watch Service;
 - Designation of individual(s) responsible for checking fire danger/designations for the day.
- Rescue, Alarm, Contain and Extinguish (RACE) procedures including:
 - Rescue anyone in danger (if safe to do so);

- Alarm – call the control room, who will then determine if 911 should be alerted;
 - Contain the fire (if safe to do so); and
 - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees County’s emergency management notification system.

4.0 Plan Updates: Amendments and Reporting Requirements:

The following information must be provided to the Department in the semi-annual construction report required per OAR 345-026-0080:

- Section 3.1 and 3.2, any changes in wildfire risk at the site or changes in facility components or preventative features.
- Section 3.4, any changes in local fire protection agency personnel and operational managers.
- Section 3.4, any changes in analysis area residence/landowner addresses or contact information.
- A copy of the Fire Season Restriction Log identified in Section 3.6.

Information from the semi-annual construction reporting may be used to establish the performance of the WMP. If determined by certificate holder or Department, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

This Plan may be amended from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council (EFSC) or ODOE, acting within its delegated authority of EFSC. Such amendments may be made without amendment of the site certificate. EFSC authorizes ODOE to agree to amendments to this Plan. ODOE will notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of this Plan agreed to by ODOE.

5.0 References

NFPA (National Fire Protection Agency). 2024. 51B Standard for Fire Prevention During Welding, Cutting, and Other Hot Work. [Free Access - NFPA 51b: Standard for Fire Prevention During Welding, Cutting, and Other Hot Work](#)

Attachment 1: Residence/Landowner Outreach Letter



DATE

RE: Community Outreach Letter for Speedway Energy Facility

My name is Vincent Esposito and I'm the Sr Manager of Asset Development for BGTF Speedway Project LLC. We are the certificate holder of the Speedway Energy Facility, approved by the Oregon Energy Facility Siting Council (EFSC). Construction of the facility is anticipated to start in the second half of 2027. The facility is a 1,400 megawatt solar, wind, and battery energy storage system facility located the City of Grass Valley in Sherman County. You are receiving this letter because your address is within 0.5 miles from the facility site boundary and we want to make sure you are aware of the following information:

- Safety at the facility is our highest priority. We have emergency procedures in place in the event of an emergency on site or off site that may impact the facility and adjacent areas. This includes an EFSC Wildfire Mitigation Plan (WMP) that addresses vegetation management, facility inspections, and maintenance protocols to ensure that the facility minimizes fire risk. The WMP also requires fire protection equipment to be on site and allows for emergency access for fire departments in the event of a fire on site or off site.
- In the event of an emergency on site or off site that cannot be addressed by facility personnel, local emergency and law enforcement will be contacted and procedures designated by the XX County's Office of emergency management will be followed, if necessary.
- If you have not already done so, we recommend you sign up for Sherman County emergency notification system. You may sign up via the County's webpage or directly via this link:

Link: <https://member.everbridge.net/index/892807736724035#/login>

Please contact me if you have any questions about the facility, XX company, or any other concerns regarding construction and operation of the facility. Further, the Oregon Department of Energy (ODOE) is staff to EFSC and can be contacted if you have questions. Follow the link below for contact information: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/Compliance-Program.aspx>

Thank you,
Vincent Esposito
Sr Manager, Asset Development
646.992.9316
Vincent.esposito@brookfieldrenewable.com

DATE

Attachment M-2. Draft Operational Wildfire Mitigation Plan

Draft

Operational Wildfire Mitigation Plan

Speedway Energy Facility

Prepared for



Speedway Energy

BGTF Speedway Project LLC

Prepared by



TETRA TECH

1750 S Harbor Way, Suite 400 | Portland, OR 97201

July 2026

Contents

Introduction.....	2
1.0 Finalizing Wildfire Mitigation Plan Prior to Operation (PRO)	2
1.1 Update Applicable Sections of WMP.....	2
2.0 Prior to Operation Task list (PRO).....	3
2.1 Training (PRO)	3
2.2 Facility Site Map(s) Submission (PRO):	4
3.0 Operational Wildfire Mitigation Plan (OPR).....	4
3.1 Summary of As-Built Facility Description with Design Features and Location of Fire Protection Equipment.....	4
3.2 Facility Site Map(s):.....	6
3.3 Specifications for Fire Protection Equipment	6
3.4 Facility Contact Information and Emergency Response Procedures.....	7
3.5 Fire Precaution Levels and Restrictions during Fire Season	8
3.6 Vegetation Management.....	11
3.6.1 Vegetation-free, Noncombustible Space.....	11
3.6.2 Vegetation Standards, Surveys and Management	12
3.7 Inspections and Maintenance.....	13
3.8 Use of Vehicles and Power Driven Machinery at Site.....	19
3.9 Operational Training(s).....	19
3.9.1 Annual Safety Training	19
3.9.2 Electrical Safety Program	20
3.10 Facility Monitoring	20
4.0 Plan Updates: Amendments and Reporting Requirements.....	21
5.0 References.....	23

List of Tables

Table 1: Fire Prevention Measures During Fire Season Summary	10
Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results.....	14

List of Attachments

Attachment 1. Residence/Landowner Outreach Letter

Draft Operational Wildfire Mitigation Plan

ODOE Template

Instructions for Siting Analyst during review of an ASC/RFA:

- Provide template to applicant/certificate holder. To the extent it can be determined during review of an ASC/RFA, determine facility design features such as setbacks, road widths and locations, vegetation management etc. This information should be reflected in Section 3.0 and should be consistent with the facility description in ASC/RFA exhibits and in other mitigation plans (Noxious Weed Plan, Reveg Plan, and Dust Control Plan).
- Provide WMP to County and fire department(s), and ask if the measures (setbacks, fire protection equipment) are sufficient. If comments indicate or request additional measures, work with analyst team and Senior Policy Advisor to determine if any changes should be made to the WMP.
- Delete this prior to sending to applicant/certificate holder.

Instructions for Applicants and Certificate Holders:

- This template includes preventative actions, procedures, and standards commonly proposed to meet the requirements of OAR 345-022-0115(1)(b) and reflects practices the Department and EFSC have identified as appropriate to minimize wildfire risk at solar photovoltaic power generation facilities. **Use of the template is not required**, and provisions in this template may be modified depending on the type of energy facility under review. Use of the template does not guarantee satisfaction with the Council's Wildfire Prevention and Risk Mitigation Standard. Use of the template does not establish a defense for any enforcement action for violation of a site certificate, Council order or rule. Use of the template or a separately-developed Wildfire Mitigation Plan does not relieve a certificate holder from proactively managing wildfire risk and taking steps to protect against wildfire beyond the measures included in the template or a separately-developed Plan.
- Areas in **yellow highlight** to be updated based on the applicant/certificate holder facility proposal and should be filled out to the extent known at the time of review of the ASC/RFA. This information will also be updated/finalized based on final design prior to operation of the facility.
- All changes to this template must be made in track changes for the Department to evaluate the scope of changes made.

Applicable EFSC Site Certificate Conditions

Wildfire Prevention and Risk Mitigation Condition 3 (PRO): Prior to operation of the facility or phase, as applicable, the certificate holder shall:

- a. Finalize the Operational Wildfire Mitigation Plan, as provided in Attachment XX to the Final Order on ASC. The final Operational Wildfire Mitigation Plan shall be submitted to the Department for review and approval.
- b. Complete pre-operational tasks and actions designated in the Operational Wildfire Mitigation Plan approved under sub a of PRO-WF-01.

[PRO-WF-01, Final Order on ASC]

Wildfire Prevention and Risk Mitigation Condition 4 (OPR): During operation, the certificate holder shall:

- a. Implement the Operational Wildfire Mitigation Plan required under PRO-WF-01, included as Attachment XX to the Final Order on ASC.
- b. After the first operational year, annually review and update Operational Wildfire Mitigation Plan as designated in the Plan, and submit the results in the annual report for that year.
- c. Updates to the Wildfire Mitigation Plan may be required if determined necessary by the certificate holder or the Department to address wildfire hazard to public health and safety. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

[CON-WF-01, Final Order on ASC]

Introduction

BGTF Speedway Project LLC (Applicant) submits this Draft Operational Wildfire Mitigation Plan (WMP) as part of the Application for Site Certificate for the Speedway Energy Facility. The facility incorporates wind, solar, and battery energy storage, and is located on privately owned land in unincorporated Sherman County, Oregon.

This plan utilizes the template provided by the Oregon Department of Energy (ODOE) on December 10, 2025, and includes preventative actions, procedures, and standards commonly proposed to meet the requirements of Oregon Administrative Rules (OAR) 345-022-0115(1)(b) and reflects practices that ODOE has identified as appropriate to minimize wildfire risk at wind power generation facilities.

1.0 Finalizing Wildfire Mitigation Plan Prior to Operation (PRO)

1.1 Update Applicable Sections of WMP

To finalize this WMP prior to operation of the facility:

- Update Section 3.1 based on final facility design including a brief description of the facility.
- Update Section 3.2 and include in this WMP the facility site maps described in Section 3.2.
- Update Section 3.4 with fire department, certificate holder, and operational manager contact information and emergency response procedures. Describe fire detection, fire suppression,

and emergency shut off systems that will be activated in the event of a fire. Update Section 3.4 with analysis area residence contact information and confirm analysis area residence contact letter sent to residences within site boundary and 0.5 miles from the facility.

- Update section 3.6 to describe vegetation management and areas that will be managed to be vegetation-free, noncombustible space, or gravel surface.
- Update Section 3.7 and Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*, based on manufacturer recommendations associated with each type of facility component and vegetation management consistent with this WMP and Revegetation Plan; and include an appendix with excerpts of manufacturer recommendations.
- Update Section 3.10 with any additional details about facility monitoring.
- Update Section 4.0 with any additional standards for future review and plan updates. Note that Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*, will be used as a compliance checklist by the Department to establish the performance of the WMP. If determined by certificate holder or Department, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation.

2.0 Prior to Operation Task list (PRO)

Prior to operation of the facility, complete the activities in Sections 2.1 and 2.2.

2.1 Training (PRO)

Before beginning operation, the certificate holder will hold an on-site training for operational personnel, inviting equipment manufacturers, specialty contractors, local fire department(s), participating and adjacent landowners, emergency management office personnel, ODOE, and any other emergency management agency. The training will cover:

- The location of electrical facility components and the fire safety measures associated with each component;
- Battery-specific safety protocols, including how to appropriately address chemical fires, in the event of an emergency;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;
- Overview of smoking policy and locations;
- Overview of procedures and restrictions of operational maintenance activities during Fire Season and Red Flag Warnings designated in this Plan;

- Designation of individual(s) responsible for Fire Watch Service;
- Designation of individual(s) responsible for checking fire danger/designations for the day.
- Overview of procedures for Rescue, Alarm, Contain and Extinguish (RACE) procedures, including:
 - Rescue anyone in danger (if safe to do so);
 - Alarm – call the control room, who will then determine if 911 should be alerted;
 - Contain the fire (if safe to do so); and
 - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to sign up for the County’s emergency management notification system.

Training attendee list and training materials must be provided to the Department to demonstrate compliance.

The certificate holder will fill out and submit to the Department the template residence outreach letter provided as Attachment 1 of this WMP. Once Department confirms the letter to be sufficient, the certificate holder will mail to each residence within the 0.5-mile analysis area. Certificate holder will confirm mailing and submit to Department.

2.2 Facility Site Map(s) Submission (PRO):

Submit updated site maps from Section 3.2 concurrently to local fire department(s), County emergency management office, and the Department.

3.0 Operational Wildfire Mitigation Plan (OPR)

3.1 Summary of As-Built Facility Description with Design Features and Location of Fire Protection Equipment

The Facility will include solar and wind power generation components with related or supporting facilities to be located within a site boundary that encompasses 23,936 acres of privately owned land in Sherman County, Oregon. The Facility’s proposed point of interconnection (POI) to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which runs northeast/southwest through the site boundary. The Facility’s components will include the following:

- Solar Area Areas;
- Wind Turbines;
- Inverters/Transformers;

- Collector Lines;
- Collector Substations;
- Central Substation;
- O&M Buildings;
- Battery Energy Storage Systems;
- Meteorological Towers;
- Perimeter Fence Lines; and
- Existing Road Improvements, New Access Roads, and Gates.

The following fire prevention features will be present within the Facility site boundary:

- Up to 24-foot-wide service and access roads, graveled or paved.
- Collector substations, the central substation, battery energy storage system areas, and O&M areas will be graveled, with no vegetation present.
- Smoke/fire detectors will be placed around the site that will be tied to the supervisory control and data acquisition (SCADA) system and will contact local firefighting services.
- O&M buildings will have basic firefighting equipment for use on site during maintenance activities, such as shovels, beaters, portable water for hand sprayers, fire extinguishers, and other equipment.
- Lightning protection systems are built into the wind turbine blades and tower to electrically ground the entire structure and to eliminate the potential for lightning-caused fires.
- Solar modules will have shielded electrical cabling, as required by applicable code, to prevent electrical fires.
- Vegetation within the solar array fence line area will be managed as needed to reduce fuels for fire (see Section 3.6 below).
- The Applicant will implement the following fire prevention and control methods to minimize fire and safety risks for the lithium-ion batteries proposed for the BESS:
 - The batteries will be stored in completely contained, leak-proof modules.
 - Fire sensors, alarms, and clean agent-based fire extinguishing systems in every battery container.
 - Ample working space will be provided around the BESS for maintenance and safety purposes.
 - Off-site, 24-hour monitoring of the BESS will be implemented and will include shutdown capabilities.

- Transportation of lithium-ion batteries is subject to 49 CFR 173.185 – Department of Transportation Pipeline and Hazardous Material Administration. This regulation contains requirements for prevention of a dangerous evolution of heat; prevention of short circuits; prevention of damage to the terminals; and prevention of batteries coming into contact with other batteries or conductive materials. Adherence to the requirements and regulations, personnel training, safe interim storage, and segregation from other potential waste streams will minimize any public hazard related to transport, use, or disposal of batteries.

3.2 Facility Site Map(s):

As discussed in Exhibit M of the Application for Site Certificate (ASC), overall wildfire risk is used to identify high-fire consequence areas. Overall wildfire risk is shown on Figure M-7 in Exhibit M.

The Facility Layout is provided as Figure 2 in the Background Information Exhibit of the ASC. The Facility Layout identifies solar array areas, wind turbine locations, collector lines, substations, battery energy storage system areas, operations and maintenance areas, construction staging and storage areas, and access roads.

The following information will be verified and provided on a figure included in the revised final Operational WMP prior to construction:

- Location and dimensions of facility roads;
- Location of vegetation free, noncombustible, defensible spaces;
- Wildfire risk at the site;
- High-fire consequence areas/resources (includes existing infrastructure, residences, sensitive habitat, or cultural resources);
- The location of facility access points and gates;
- A description and the location of emergency access procedures, including how emergency responders and/or adjacent landowners may access site for fire protection equipment or to extinguish an on-site fire when personnel will not be onsite. (e.g. The facility will be gated and accessible by access codes. Local fire departments and emergency officials will receive codes to access the facility in the event of a fire);
- The type and location of fire protection equipment on site;
- The location(s) of water source(s) that will be on-site during operations. (e.g., water trucks on site during fire season will be staged at the O&M building).

3.3 Specifications for Fire Protection Equipment

The following fire suppression equipment will be carried in vehicles conducting maintenance activities and stored on-site at the O&M building:

- Fire Extinguisher: Dry chemical. 2A:10BC (5 pounds), properly mounted or secured;

- Pulaski;
- Hand Shovel: Round point. 26 to 28 in "D" Handle, blade - 12 inches long and 10 inches wide;
- Collapsible Pail or Backpack Pump: 5-gallon capacity; and
- Drip Can: 5-gallon capacity.

During fire season (as designated in this Plan) water truck(s)/water source, water buffalo, or tank with minimum 500-gallon capacity must be on site. The water truck or water supply shall include the following, unless approved by the Department:

- Pump should be maintained ready to operate and capable of providing a discharge of not less than 20 gallons per minute at 115 psi at pump level. Note: Volume pumps will not produce the necessary pressure to effectively attack a fire start. Pressure pumps are recommended. Provide enough hose (500 feet minimum) not less than 3/4" inside diameter to reach areas where power driven machinery has worked.
- Water supply, pump, and at least 250' of hose with nozzle must be maintained as a connected, operating unit ready for immediate use.

All internal combustion engines must be equipped with exhaust systems, mufflers and screens, or include an appropriate spark arrester; and must be kept in good operating condition.

All combustion engines (including but not limited to off road vehicles, chainsaws, and generators) will be equipped with a spark arrester that meets U.S. Forest Service Standard 5100-1.

All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.4 Facility Contact Information and Emergency Response Procedures

Local fire department and county emergency management contact information:

- South Sherman Fire District:
 - District Fire Chief – Bert Norris: bnorris@southshermanfire.com
 - Phone: (541) 333-2525
- Moro Rural Fire Protection District:
 - District Fire Chief – Joseph Belshe: joseph.belshe@morofire.com
 - Phone: (541) 565-3100
- Sherman County Emergency Services:
 - Director – Dana Pursley-Haner: shermanems@shermancounty.net
 - Phone: (541) 565-3100

Fire department response times to the site:

- The Applicant will work with the South Sherman Fire District and Moro Rural Fire Protection

District to determine response times to the site and this information will be included in the final Operational WMP.

Certificate holder primary contact and contact of operational manager(s):

- The operations manager's information will be provided prior to operation

A list of residences within the site boundary and 0.5 miles of the site boundary is included as an attachment to Exhibit O3 (Noise).

Residence/landowner outreach letter is provided as Attachment 1 of this WMP. Use this letter to provide new or updated residences with the analysis area as designated in Section 4.0, Plan Updates and Reporting Requirements.

Contact 911 in the event of:

- A fire or emergency on-site that cannot be addressed by personnel on-site and requires the assistance of fire or emergency medical personnel;
- A fire ignition on-site that spreads out of the fence line;
- Any fire off-site that does not have emergency responders on site.
 - To the extent that operational personnel can safely assist and/or provide equipment to help extinguish off-site fires until emergency responders are on site, it is encouraged to do so to assist in the spread of the fire, loss of life, property and damage to the environment.

3.5 Fire Precaution Levels and Restrictions during Fire Season

Definitions:

 **Non-Fire Season** – Approximately October - May

 **Fire Season** – Approximately June-September, formally designated by the Oregon Department of Forestry (ODF). Under ORS 478.960 (4), a Fire Chief can establish Fire Season within a Fire District when ODF, under ORS 477.505, declares Fire Season. Begins seasonal restrictions for public and industry.

 **Fire Weather Watch** - A fire weather watch is issued when there is a high potential for the development of a red flag event. A watch is issued 18 to 96 hours in advance of the expected onset of criteria. Intent of a fire weather watch is to alert forecast users at least a day in advance for the purposes of resource allocation and fire fighter safety. A watch means critical fire weather conditions are possible but not imminent or occurring.

 **Red Flag Weather Warning** - A red flag warning is used to warn of impending or occurring red flag conditions. Its issuance denotes a high degree of confidence that weather and fuel conditions consistent with local red flag event criteria will occur in 48 hours or less. Specific Red Flag criteria differ for each situation and district in Oregon. Be extremely careful with open flames and other activities that emit sparks.

Hot Work -Any cutting, grinding, welding, or other activity that creates spark or open flame. Hot work on site will be conducted in accordance with NFPA 51B and the site's Hot Work Permit system.

Fire Watch Service:

Fire watch shall follow the requirements in NFPA 51B Section 5.6, including

- Be physically capable and experienced to operate firefighting equipment.
- Have facilities for transportation and communications to summon assistance.
- Observe locations where hot work occurred during the day.

Upon discovery of a fire, Firewatch personnel must: First report the fire, summon any necessary firefighting assistance, describe intended fire suppression activities; 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.

Fire-Prevention Measures and Restrictions Associated with Fire Season:

Certificate holder shall maintain a log when operational activities are impacted by Fire Restrictions during Fire Season as designed in this Section. The log will include:

- The date;
- Fire Precaution Level;
- Description of actions taken, including if any measures were taken to reduce wildfire risk that are not identified in this Plan.

 Non-Fire Season

- All hot work will be conducted in accordance with the Hot Work Permit issued by the approved hot work manager and NFPA 51B, Standard for Fire Prevention During Welding, Cutting, and Other Hot Work.
- Smoking in designated areas only.



Fire Season

- Before the start of each daily shift, at approximately 07:00 a.m. local time, a designated individual will check the fire danger posting by the National Weather Service for any Red Flag Warnings for that day.
- All hot work will be conducted in accordance with the Hot Work Permit issued by the approved hot work manager and NFPA 51B, Standard for Fire Prevention During Welding, Cutting, and Other Hot Work.
- Water source meeting specifications in this Plan will be on site during fire season.
- Following the completion of hot work, the Certificate Holder or contractor(s) must maintain a fire watch for 60 minutes to monitor for potential ignition. In accordance with the NFPA 51B standards, this period can be shortened to no less than 30 minutes if the fire watch determines the absence of fire hazards or as approved by the authorized hot work manager.
- Fire watch shall be on duty during any breaks and for one hour after the completion of hot work unless fire watch has determined the absence of fire hazard.

- Smoking in designated areas only.



Fire Weather Watch

- Hot work will be performed in areas that have been made fire safe as defined in NHPA 51B. Hot work will be done in accordance with the Hot Work Permit and with NFPA 51B Standard for Fire Prevention During Welding, Cutting, and Other Hot Work. Examples of making an area fire safe include but are not limited to removing all vegetation, using welding blankets, or wetting an area. The authorized hot work manager will approve hot work based on their assessment of compliance with fire safety.
- Driving and parking are permitted on graveled surfaces and off-road in areas that have been mowed.
- Fire watch shall be on duty during any breaks and for one hour after the completion of hot work unless fire watch has determined the absence of fire hazard.
- No smoking on site.



Red Flag Weather Warning

- Hot work will be performed in areas that have been made fire safe as defined in NHPA 51B. Hot work will be done in accordance with the Hot Work Permit and with NFPA 51B Standard for Fire Prevention During Welding, Cutting, and Other Hot Work. Examples of making an area fire safe include but are not limited to removing all vegetation, using welding blankets, or wetting an area. The authorized hot work manager will approve hot work based on their assessment of compliance with fire safety.
- On-site personnel must be aware of Red Flag Warning.
- Driving and parking are permitted on graveled surfaces and off-road in areas that have been made fire safe.
- Fire watch shall be on duty during any breaks and for one hour after the completion of hot work.
- No smoking on site.

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.

Table 1: Fire Prevention Measures During Fire Season Summary

Requirement	 Non-Fire Season	 Fire Season	 Fire Weather Watch	 Red Flag Warning
Hot work	Only permitted on roads, non-combustible surfaces, or off-road in areas that have been made fire safe.	Permitted on roads, on non-combustible surfaces, and off-road areas that have been made fire safe; fire watch required for 60 minutes after completion but may be shortened if fire risk is low.	Permitted in areas that have been made fire safe and done in accordance with the Hot Work Permit and NFPA 51B standards.	Permitted in areas that have been made fire safe and done in accordance with the Hot Work Permit and NFPA 51B standards.
Fire Watch Service	Not required	During breaks and for 30 to 60 minutes after completion of hot work for the day depending on fire risk.	During breaks and for 30 to 60 minutes after completion of hot work for the day, depending on fire risk.	During breaks and for 60 minutes after completion of hot work for the day depending on fire risk.
Driving and Parking	As described in Section 3.8.	As described in Section 3.8.	As described in Section 3.8.	As described in Section 3.8.
Smoking	Designated areas only	Designated areas only	Not permitted	Not permitted

3.6 Vegetation Management

3.6.1 Vegetation-free, Noncombustible Space

Vegetation within the fence line and below the solar arrays will be maintained as follows:

- Vegetation will be limited to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment. Vegetation near, at, or taller than the maximum height shall be removed or mowed.
- Mowing must be done in advance of fire season or accordance to any fire restrictions.

- Vegetation will be removed periodically to avoid contact with electrical equipment
- Vegetation buildup in the fence line(s), shall be removed periodically.
- Any vegetation removed from the site will be disposed of and not stored onsite. Certificate holder and contractors will prevent the accumulation of combustible “burn piles” on site.

The following areas will be managed to be vegetation-free, noncombustible space, or gravel surface:

- Up to 24-foot-wide service roads – graveled.
- 20-foot noncombustible, defensible space clearance inside fence lines for solar areas and provide an additional 20-foot maintained fire break outside all east-facing fencelines bordering non-participating properties or situated upwind of residences and buildings.
- Within the fenced perimeter of the battery energy storage system areas, collector substations, and central substation will be graveled, similar noncombustible base, or vegetation free.
- Parking and O&M building perimeter - graveled.
- Vegetation along service roads will be managed by mowing or other vegetation removal.

Vegetation in these areas will be managed by the following techniques:

- Mechanical Clearing: mowing, brushing, chipping, tree trimming/felling.
- Manual Clearing: hand tools (chainsaws, machetes, handsaws).
- Chemical Treatment: use of approved herbicides by licensed applicators to control or suppress vegetation growth (broadcast spray, spot treatment, cut-stump/basal bark).

3.6.2 Vegetation Standards, Surveys and Management

Vegetation within the fence line and below the solar arrays will be maintained in accordance with the approved Vegetation and Soil Management Plan (add final location) for the facility.

- Vegetation will be limited to a height of 10-12 inches.
- At no point shall vegetation come in contact with electrical equipment.
- Vegetation near, at, or taller than the maximum height shall be removed or mowed.
- Mowing must be done in advance of fire season or accordance to any fire restrictions.
- At no point shall vegetation come in contact with electrical equipment.
- Vegetation buildup in the fence line(s), shall be removed.
- Any vegetation removed from the site will be disposed of and not stored onsite. Certificate holder and contractors will prevent the accumulation of combustible “burn piles” on site.

A vegetation assessment survey of the fenced area will be completed at least twice a year to monitor vegetation clearances and maintenance of fire breaks, and wildfire hazards. One survey will occur before the fire season begins, in May or June. The second survey will occur in October or November.

Additional vegetation surveys and management may be required throughout the year based on seasonally heightened fire risk, vegetation growth, or observations from operational maintenance staff.

The survey will be conducted by a vegetation specialist and will be used to assess the frequency of upcoming vegetation maintenance and will assess and document the following:

- Location;
- Species;
- Height;
- Proximity to facility components;
- Estimated growth rate;
- Abundance;
- Clearance/setbacks; and
- Risk of fire hazard.

Results of surveys shall be provided in the annual updates to this WMP, designated in Section 4.0.

Vegetation control includes: (to be consistent with this WMP)

- Vegetation and Soil Management Plan (Exhibit C, Attachment C-2)

3.7 Inspections and Maintenance

Facility components will be inspected and maintained as designated in Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results* below. Update Table 2 based on manufacturer recommendations associated with each type of facility component and vegetation management consistent with this WMP and Revegetation Plan.

Table 2 includes an operational check list that will be filled out designating which personnel conducted inspections and maintenance, the dates of inspections and maintenance, and results. As designated in Section 4.0, of this WMP, this table checklist will be submitted to demonstrate compliance with the WMP and used to determine if changes to the WMP are necessary. Other checklists may be provided prior to operation and in the annual review of the WMP, as approved by the Department.

Lock Out/Tag Out Program:

During maintenance activities, electrical equipment is de-energized and physically locked or tagged in the de-energized positions to avoid inadvertent events that could result in arc flash.

- Ensure equipment is maintained to prevent and control sources of ignition.

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard ¹	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
System Protection	Protection Relays - Verify calibration and check functionality. Breaker Trip Testing - Verify the ability to trip breakers via coil.	5 years	Manufacturer’s maintenance recommendations	Repair or replace once every 5 years	Date:	Date:
					Personnel:	Personnel:
					Results:	Results:
System Protection	System Protection Potential Transducers (“PTs”) and Current Transducers (“CTs”) Verify calibration and check functionality.	11 Years	Manufacturer’s maintenance recommendations	Repair or replace once every 11 years	Notes:	Notes:
					Date:	Date:
					Personnel:	Personnel:
Solar Inverter	- Visual inspection of inverter and surrounding area. - Verify torque specifications. - For alternating current (AC)/direct current (DC), perform inspection of communication and control power terminations. - Cycle AC/DC disconnects, inspect AC/DC contactors and cooling fans. - Perform infrared scan. Inverter Testing and Preventative Parts Replacement - Preventative maintenance replacement of inverter parts (e.g.: cooling system and power supplies that are operating effectively but scheduled for replacement per manufacturer's recommendations).	Annual	Spill Prevention, Control, and Countermeasures (SPCC) Plan ³ Manufacturer’s maintenance recommendations	- Monthly SPCC Plan - Bi-annual Preventative Maintenance - Per manufacturer’s recommendations	Date:	Date:
					Personnel:	Personnel:
					Results:	Results:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on gravel pad around inverter to prevent vegetation growth. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon visual inspections listed above.	Notes:	Notes:
					Date:	Date:
					Personnel:	Personnel:
Tracker System	- Perform visual inspection of tracking components; sync data with the Applicant’s Operations Center. - Perform visual inspection of module clamps and rail fasteners for integrity. - Perform visual inspection of gear drives and shaft assemblies for alignment. - Grease gear boxes and/or drive shaft. - Verify wind stow functionality and lubricate slew ring.	Annual	Manufacturer’s maintenance recommendations	Per manufacturer’s recommendations	Results:	Results:
					Notes:	Notes:
					Date:	Date:
Solar Array Structures	Perform visual inspection of mounting structures,	Annual	Manufacturer’s	Repair or replace annually	Personnel:	Personnel:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard ¹	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
Solar Array Panels, Harnesses, and Combiner Boxes	grounding, and cabling.		maintenance recommendations		Personnel:	Personnel:
					Results:	Results:
					Notes:	Notes:
	At Applicant’s sole discretion, to perform one of the following options: • Infra-red (“IR”) Flyover a. IR scan of Site providing DC health of the Facility down to string level reporting; or • Physical DC Health Inspection a. Perform visual inspection of whips and wires connectors for damage or exposed conductors in gutters of harness combiner boxes. b. Measure and record current of each whip using clamp-on meter and identify low performing whips.	Annual	Applicant’s discretion	Repair or replace annually	Date:	Date:
					Personnel:	Personnel:
					Results:	Results:
Collector Substation	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components	Vegetation: Vegetation under solar arrays will be maintained to a height of 10-12 inches, with a minimum clearance of 12 inches from electrical equipment. Methods include manual removal, mowing, or as designate din this Plan.	Vegetation: Twice a year, or more often, as designate din this Plan.	Date:	Date:
					Personnel:	Personnel:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components	Vegetation: Herbicide application on substation gravel pad. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon routine visual inspections.	Results:	Results:
					Notes:	Notes:
Collector Substation	• Perform visual inspection of the grounding system. • Perform thermographic and visual inspection. • Perform uninterrupted power supply (UPS) inspection and maintenance.	Annual	Manufacturer’s maintenance recommendations North American Electric Reliability Corporation (NERC)	Repair or replace annually	Date:	Date:
					Personnel:	Personnel:
Collector Substation	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on substation gravel pad. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon routine visual inspections.	Results:	Results:
					Notes:	Notes:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard ¹	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
BESS	- Set battery maintenance (system check, cell balancing). - Battery cable, appearance, grounding, dust removal. - Inspect battery management system alarms. - Visual inspection of electrical terminations using thermal imager.	Annual with weekly visual inspections	Manufacturer’s maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on substation gravel pad. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon routine visual inspections.	Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	- Check for correct operations of battery monitoring system and battery charging system. - Perform visual inspection of the battery room, mounting rack, batteries, and connections.	Monthly	Manufacturer’s maintenance recommendations	Repair or replace monthly	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	Perform individual cell float charge and specific gravity checks.	Quarterly	Manufacturer’s maintenance recommendations	Repair or replace quarterly	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Unit Control Enclosure Battery	Measure float cell voltage, pilot cell voltage, and electrolyte temperature of pilot cell.	Annual	Manufacturer’s maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Supervisory, Control and Data Acquisition (SCADA) & Network Equipment	Plant equipment will be evaluated every 5 years to determine state of health and provide recommendations to Savion.	5 Years	Manufacturer’s maintenance recommendations	Upgrade, repair, or replace every 5 years	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Junction Box/ Auxiliary System/Miscellaneous	- Auxiliary equipment maintenance and inspection. - Enclosure dust removal. - Inspect cable entry, grounding, sealing, dust removal.	Annual	Manufacturer’s maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard ¹	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
	- Critical sensor calibration check. - Maintenance report.				Results: Notes:	Results: Notes:
BESS Fire Safety System	- Fire alarm and detection system inspection. - Fire alarm and detection system maintenance. - Fire suppression System Inspection.	Annual	Manufacturer’s maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Thermal Management System	- Thermal management system inspection. - Thermal management system maintenance. - Motor Lubrication. - Clean Filters by rinsing with water. - Electric Heater - Dust accumulation on the coil, signs of overheating on the heater frame, traces of water or rust on the electric heater control box.	Annual	Manufacturer’s maintenance recommendations	Repair or replace semi-annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS Thermal Management System	Coolant tester visual inspection.	Annual	Manufacturer’s maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
BESS General	System configuration check.	Annual with weekly visual inspections	Manufacturer’s maintenance recommendations	Repair or replace annually	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Medium Voltage (MV) and High Voltage (HV) Breaker	- Clean out dirt and debris. - Perform a manual operation test. - Perform an electrical test. - Perform a gas leakage test.	Annual	Manufacturer’s maintenance recommendations	Repair or replace per manufacturer’s recommendations	Date: Personnel:	Date: Personnel:
			NERC		Results: Notes:	Results: Notes:
Generator Step-Up (GSU) Transformer	- Perform a visual inspection and check for proper operation of fan motor, oil pump motor, and breather. - Inspect and maintain substation transformer bushings	Monthly	SPCC Plan ³	Repair, overhaul, refurbish, or replace per manufacturer’s recommendations	Date: Personnel:	Date: Personnel:

Table 2: Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results

Facility Component(s)	Inspection Procedure	Inspection Frequency	Standard ¹	Maintenance Schedule	Date and Personnel Completing Inspection(s); Inspection Results	Date and Personnel Completing Maintenance; Maintenance Results
	and control panel. Perform visual inspection of bushings for indications of local heating, oil leaks, proper oil level and indication of contaminants.		Manufacturer's maintenance recommendations		Results: Notes:	Results: Notes:
Inverter Step-up Transformer	- Perform infrared scans on low side of transformer when power is >80%. - Verify temperature and pressure sync with the contractor's Operations Center. - Perform visual inspection of the physical integrity of the enclosure and check for oil leakage. - Perform visual inspection for damage or discoloration of bushings. - Perform oil sample analysis on MV transformer(s). - Collect MV transformer oil sample(s) for 3rd party analysis. - Perform electrical test of transformer. - Verify integrity of surge arresters and check for proper tap position.	Annual	SPCC Plan ³ Manufacturer's maintenance recommendations	Replace or repair per manufacturer's recommendation	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
	Vegetation: Visual inspection during component inspections and visual inspections during vegetation surveys twice a year.	Vegetation: Twice a year during vegetation surveys and additional visual inspections during routine inspections of components.	Vegetation: Herbicide application on gravel pad around inverter to prevent vegetation growth. IEEE 80 NEC 70	Vegetation: Yearly, depending on vegetation condition. Or more frequent based on vegetation survey results or upon visual inspections listed above.	Date: Personnel:	Date: Personnel:
					Results: Notes:	Results: Notes:
Overhead electrical lines	Visual inspection of components, grounding and APLIC measures.	Annual	APLIC		Date: Personnel:	Date: Personnel:
	Vegetation: Visual inspection of vertical clearance distance between conductor and vegetation.	Annual	Vegetation: National Energy Reliability Corporation (NERC) - Vegetation maintenance standard FAC-003-0. Mow vegetation to achieve clearance requirements between conductor and ground.	Vegetation: Yearly, depending on vegetation condition.	Results: Notes:	Results: Notes:
1. The Operational SPCC Plan for the Facility will require these components to be inspected monthly for spills. During these inspections, Operational Staff will also visually inspect the component and surrounding area.						

3.8 Use of Vehicles and Power Driven Machinery at Site

The following best management practices (BMPs) to minimize fire risk from vehicle travel, equipment use, and fueling activities will be implemented at the site during operational activities:

- The movement of vehicles will be planned and managed to minimize fire risk.
- As necessary, contractor(s) or operational personnel will be responsible for identifying approved areas for all off-road vehicle travel. Prior to off-road vehicle travel, tall grasses will be mowed. During fire season, vegetated areas will be mowed or wetted to allow for off-road travel and parking as designated in this plan.
- Areas with grass that are as tall or taller than the exhaust system of a vehicle will be mowed before vehicles travel through it.
- Workers will be instructed to shut off the engine of any vehicle that gets stuck, and periodically inspect the area adjacent to the exhaust system for evidence of ignition of vegetation. Stuck vehicles will be pulled out rather than “rocked” free and the area will be inspected again after the vehicle has been moved.
- Fuel containers, if used, shall remain in a vehicle or equipment trailer, parked at a designated location alongside a county right-of-way. No fuel containers shall be in the vehicles that exit the right-of-way except the five-gallon container that is required for the water truck pump.
- All power driven machinery will be kept free of excess flammable material which may create a risk of fire.

3.9 Operational Training(s)

3.9.1 *Annual Safety Training*

Organize and hold an on-site training with operational and specialty contractors that covers:

- The location of electrical facility components and the fire safety measures associated with each component;
- Battery-specific safety protocols, including how to appropriately address chemical fires, in the event of an emergency;
- The type, location, and proper use of fire protection equipment;
- Fire protection equipment maintenance requirements;
- The location(s) of water source(s) and proper usage, storing and maintenance for the pump, hose nozzle; and water hose;

- Overview of smoking policy and locations;
- Overview of procedures and restrictions of operational maintenance activities during Fire Season and Red Flag Warnings designated in this Plan; Rescue, Alarm, Contain and Extinguish (RACE) procedures, including:
 - Rescue anyone in danger (if safe to do so);
 - Alarm – call the control room, who will then determine if 911 should be alerted;
 - Contain the fire (if safe to do so); and
 - Extinguish the incipient fire stage (if safe to do so).
- Provide information and encourage attendees to sign up for the County’s emergency management notification system.

Training attendee list and training materials must be provided to the Department to demonstrate compliance.

3.9.2 Electrical Safety Program

All operational workers will be trained in electrical safety and the specific hazards of the facility. This training will address:

- Minimum experience requirements to work on different types of electrical components;
- Lockout/tagout procedures
- Electrical equipment testing and troubleshooting;
- Switching system;
- Provisions for entering high voltage areas (e.g., substation);
- Minimum approach distances; and
- Required personal protective equipment.

3.10 Facility Monitoring

Facility components that are monitored via the SCADA system are the solar inverters, collector substation, BESS, and overhead electrical lines.

Facility components will be monitored remotely with the SCADA system 24 hours a day, 7 days a week.

Smoke and fire detectors are placed throughout the facility, will be connected to the SCADA system, and can contact local firefighting services if needed. The BESS will also have integrated fire safety and monitoring systems to detect and alarm if a fire condition is detected.

Facility has remote shutdown capabilities through the SCADA system.

4.0 Plan Updates: Amendments and Reporting Requirements

The following information must be provided to the Department in the annual report required per OAR 345-026-0080:

- Section 3.1 and 3.2, any changes in wildfire risk at the site or changes in facility components or preventative features.
- Section 3.4, any changes in local fire protection agency personnel and operational managers.
- Section 3.4, any changes in analysis area residence/landowner addresses or contact information.
- Fill out Table 2: *Operational Electrical Component and Vegetation Inspection and Maintenance Schedule and Results*, with the dates, personnel, and results of inspections and maintenance performed. A different form or checklist of operational inspection, vegetation management, and maintenance may be used if approved by the Department.
- A copy of the Fire Season Restriction Log identified in Section 3.5.

The certificate holder must review this WMP annually to determine if updates to the WMP are necessary. In its annual review, the certificate holder will evaluate changes in standards, policies, future technologies or best practices that could be implemented at the facility to address wildfire prevention or protection, including but not limited to those identified in Table 3, below.

Information from the annual reporting and from the certificate holder or Department review of sources in Table 3 may be used to establish the performance of the WMP. If determined by certificate holder or Department, adjustments or improvements must be proposed to ensure the WMP provides wildfire mitigation. Any Department required updates shall be implemented within 14 days, unless otherwise agreed to by the Department based on a good faith effort to address wildfire hazard.

This Plan may be amended from time to time by agreement of the certificate holder and the Oregon Energy Facility Siting Council (EFSC) or ODOE, acting within its delegated authority of EFSC. Such amendments may be made without amendment of the site certificate. EFSC authorizes ODOE to agree to amendments to this Plan. ODOE will notify EFSC of all amendments, and EFSC retains the authority to approve, reject, or modify any amendment of this Plan agreed to by ODOE.

Table 3. Standards for Future Review

Reference	Description	Method
American Clean Power	Industry ground that establishes best practices for renewable energy projects.	The applicant is a member of ACP and participates in best practice development ¹ .
National Electric Reliability	National Energy Reliability Corporation develops electrical standards for large energy facilities.	The applicant will follow NERC Standard FAC-003-0 for its vegetation management program of transmission lines ² , or updates to this

Reference	Description	Method
		standard as approved by NERC.
Oregon Specialty Building Codes	Building codes applicable to inhabitable spaces, including the O&M building and the substation enclosure.	Remodeling to the O&M and enclosure structure that requires permits will follow any updates to the OSPC at that time.
Oregon Fire Code	The Oregon State Fire Marshal adopts the Oregon Fire Code, establishing minimum fire prevention and protection systems requirements applicable to certain structures, including but not limited to, energy systems.	The certificate holder will adhere to any applicable standards of the Oregon Fire Code and will incorporate features necessary to meet those standards into the design of the facility. Certificate holder will annually review and apply applicable standards that may apply to an operational facility.
NFPA Codes and Standards	The National Fire Protection Association publishes codes and standards intended to minimize the possibility and effects of fire and other risks/	The certificate holder will identify and adhere to any applicable codes and standards and will incorporate features necessary to meet those standards into the design of the facility. Certificate Holder will annually review and apply applicable standards that may apply to an operational facility.
ORS chapter 477, OAR chapter 629-043	Standards and rules for fire prevention in forest and range land administered by Oregon Department of Forestry.	The certificate holder will be familiar with and operate consistently with the applicable standards, including any updates to rules or standards and will provide a summary of standards that are updated and implemented at the facility.
OAR chapter 860, division 024	Safety standards for transmission lines adopted by Oregon PUC.	The certificate holder will maintain consistency with any applicable vegetation clearance requirements, pruning standards, and high fire risk zone safety standards and will provide a summary of standards that are updated and implemented at the facility.
1. Link to ACP Standards & Practices: https://cleanpower.org/resources/types/standards-and-practices/ . 2. NERC FAC-003-0: https://www.nerc.com/pa/Stand/Reliability%20Standards/FAC-003-0.pdf . 3. Link to APLIC member organization: https://www.aplic.org/member_websites.php .		

5.0 References

NFPA (National Fire Protection Agency). 2024. 51B Standard for Fire Prevention During Welding, Cutting, and Other Hot Work. [Free Access - NFPA 51b: Standard for Fire Prevention During Welding, Cutting, and Other Hot Work](#)

Attachment 1: Residence/Landowner Outreach Letter



DATE

RE: Community Outreach Letter for Speedway Energy Facility

My name is Vincent Esposito and I'm the Sr Manager of Asset Development for BGTF Speedway Project LLC. We are the certificate holder of the Speedway Energy Facility, approved by the Oregon Energy Facility Siting Council (EFSC). Construction of the facility is anticipated to start in the second half of 2027. The facility is a 1,400 megawatt solar, wind, and battery energy storage system facility located the City of Grass Valley in Sherman County. You are receiving this letter because your address is within 0.5 miles from the facility site boundary and we want to make sure you are aware of the following information:

- Safety at the facility is our highest priority. We have emergency procedures in place in the event of an emergency on site or off site that may impact the facility and adjacent areas. This includes an EFSC Wildfire Mitigation Plan (WMP) that addresses vegetation management, facility inspections, and maintenance protocols to ensure that the facility minimizes fire risk. The WMP also requires fire protection equipment to be on site and allows for emergency access for fire departments in the event of a fire on site or off site.
- In the event of an emergency on site or off site that cannot be addressed by facility personnel, local emergency and law enforcement will be contacted and procedures designated by the XX County's Office of emergency management will be followed, if necessary.
- If you have not already done so, we recommend you sign up for Sherman County emergency notification system. You may sign up via the County's webpage or directly via this link:

Link: <https://member.everbridge.net/index/892807736724035#/login>

Please contact me if you have any questions about the facility, XX company, or any other concerns regarding construction and operation of the facility. Further, the Oregon Department of Energy (ODOE) is staff to EFSC and can be contacted if you have questions. Follow the link below for contact information: <https://www.oregon.gov/energy/facilities-safety/facilities/Pages/Compliance-Program.aspx>

Thank you,
Vincent Esposito
Sr Manager, Asset Development
646.992.9316
Vincent.esposito@brookfieldrenewable.com

DATE