

Appendix O

Framework Fire Prevention and Suppression Plan

Gateway West Transmission Line Project

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1.0 INTRODUCTION

Rocky Mountain Power and Idaho Power Company (Companies) are proposing to construct and operate approximately 1,000 miles of new 230-kilovolt (kV), 345-kV and 500-kV alternating current electric transmission system, called the Gateway West Transmission Line Project (Project), consisting of 10 segments between the Windstar Substation at Glenrock, Wyoming, and the Hemingway Substation approximately 30 miles southwest of Boise, Idaho. The proposed transmission line is needed to supplement existing transmission lines in order to relieve operating limitations, increase capacity, and improve reliability in the existing electric transmission grid, allowing for the delivery of up to 1,500 megawatts of additional energy for the Companies' larger service areas and to other interconnected systems. The Project is principally necessary to serve future needs in Utah and Idaho, though other markets may also be served, including Wyoming's oil and gas field electricity needs. The Project includes ground-disturbing activities associated with the construction of above-ground, single-circuit transmission lines involving towers, access roads, multiuse areas, fly yards, and pulling sites as well as associated substations, communication sites, and electrical supply distribution lines. The Project crosses private land and public lands administered by the Bureau of Land Management (BLM), U.S. Forest Service (Forest Service), and the states of Idaho and Wyoming.

This Framework Fire Prevention and Suppression Plan (Plan) describes the framework for measures to be taken by the Companies and their contractors (Contractor) to ensure fire prevention and suppression measures are carried out in accordance with federal, state, and local regulations. Measures identified in this Plan apply to work within the project area defined as the right-of-way (ROW); access roads; all work and storage areas, whether temporary or permanent; and other areas used during construction and operation of the Project. This document provides a template for the detailed Final Fire Prevention and Suppression Plan to be developed by the Construction Contractor.

1.1 Purpose

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

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

1.2 Wyoming's Wildfire Protection System

The prevention and suppression of wildfires in southern Wyoming is carried out by the BLM, Forest Service, and local fire districts and agencies (Table O-1). The agencies' activities are closely coordinated, primarily through the National Interagency Fire Center in Boise, Idaho, and Regional Interagency Dispatch Centers in Casper, Wyoming, and Rawlins, Wyoming. Individual fire crews from BLM field offices and Forest Service Ranger Districts coordinate fire suppression activities on federal land within their

1 jurisdictions. The Wyoming State Forestry Division (WSFD) is responsible for fire
 2 suppression on Wyoming state land. Local fire districts and agencies provide fire
 3 prevention and suppression activities on private land, and may assist with fires on state
 4 or federal lands as requested by those agencies.

5
 6 **Table O-1.** Fire Suppression Responsibilities in Wyoming

Who	Where	Miles of Proposed Route
Bureau of Land Management	National System of Public Lands	204
U.S. Forest Service	National Forest (NF) and National Grasslands	7
Bureau of Reclamation	Bureau of Reclamation Lands	3
Wyoming State Forestry Division	Wyoming State Lands	66
City fire departments and rural fire protection districts in mutual aid with WSFD	Structures in Wyoming's wildland interface areas covered by mutual-aid agreements.	256

Source: GIS Ownership_Analysis_20111219.xlsx.

7 **1.3 Idaho's Wildfire Protection System**

8 Wildland fire suppression in Idaho operates much the same way as described for
 9 Wyoming (Table O-2). Wildland fire suppression and fire-management activities in
 10 Idaho are organized through the National Interagency Fire Center in Boise, Idaho, and
 11 locally on federal land by individual BLM field offices or Forest Service Ranger Districts.
 12 Various mutual-aid agreements with community fire departments and the Idaho
 13 Department of Lands (IDL) are in force throughout the Project area.

14 **Table O-2.** Fire Suppression Responsibilities in Idaho

Who	Where	Miles of Proposed Route
Idaho Department of Lands	State-owned lands	30
Bureau of Land Management	National System of Public Lands	276
Bureau of Reclamation	Bureau of Reclamation Lands	2
U.S. Forest Service	National Forest (NF)	9
City fire departments and rural fire protection districts	Private lands	250

Source: GIS Ownership_Analysis_20111219.xlsx.

15 **1.4 Responsibilities and Coordination**

16 This Plan will be implemented by the Companies and the Contractor on the Project. The
 17 Companies and the Contractor are responsible for providing all necessary fire-fighting
 18 equipment on the project site to their respective employees and operating under the
 19 requirements of this Plan. Prior to construction, the Companies will contact the
 20 appropriate fire-control authorities to establish communications, obtain any required
 21 permits (such as burning or fire waiver permits prior to conducting any heavy equipment
 22 or burning activities), and/or fulfill other obligations as directed by fire-control authorities.
 23 The Companies will also do the following:

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

9 The fire prevention and suppression measures described in this Plan will be in effect
10 from pre-construction to the end of restoration. These restrictions may change by
11 advance written notice by fire-control authorities. However, required tools and
12 equipment will be kept in serviceable condition and will be immediately available at all
13 times.

14 **2.0 FIRE PREVENTION MEASURES**

15 **2.1 Preconstruction and Construction**

16 Methods and procedures to be implemented prior to and during construction, operation,
17 maintenance, and termination of the Project to minimize the risk of fire are described in
18 the following sections.

19 **2.1.1 Training**

20 The Contractor will train all personnel on the measures to take in the event of a fire.
21 The Contractor will also inform each construction crew member of fire dangers,
22 locations of extinguishers and equipment, and individual responsibilities for fire
23 prevention and suppression during regular safety briefings. Smoking and fire rules also
24 will be discussed with the Contractor and all field personnel during the Project's
25 environmental training.

26 **2.1.2 Smoking**

27 Smoking is never permitted in any area designated by DANGER or NO SMOKING
28 signs. Smoking is not permitted in these areas regardless of any other factor. Smoking
29 is only permitted on access roads, within vehicles, and in approved smoking areas.

30 **2.1.3 Spark Arresters**

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

1 **2.1.4 Parking, Vehicle Operation, and Storage Areas**

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

9 **2.1.5 Equipment**

10 All motor vehicles and equipment will carry at least 1 long-handled (48-inch minimum),
11 round-point shovel; a double-bit ax or Pulaski (3.5 pounds or larger); and one dry
12 chemical fire extinguisher (with an Underwriters Laboratories [UL] rating of at least 5B
13 or C). Individuals using power saws and grinders will have a shovel as described above,
14 and an 8-ounce capacity fire extinguisher immediately available. All equipment will be
15 kept in a serviceable condition and readily available.

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

21 **2.1.6 Road Closures**

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

30 **2.1.7 Refueling**

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

35 **2.1.8 Burning**

36 Contractor and Companies' personnel are prohibited from burning slash, brush, stumps,
37 trash, explosives storage boxes, or other Project debris unless specifically contracted to
38 do so.

1 **2.1.9 Flammable Liquids and Explosives**

2 The handling and use of explosives shall be conducted in strict conformance with all
3 local, state, and federal regulations as detailed in the Companies' Construction
4 Specification on Blasting.

5 **2.1.10 Communications**

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

11 **2.1.11 Welding**

12 One 5-gallon backpack pump will be required with each welding unit in addition to the
13 standard fire equipment required in all vehicles. All equipment will be kept in a
14 serviceable condition and readily available.

15 **2.1.12 Fire Suppression**

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

- 18 • Take immediate action to suppress fires using all available manpower and
19 equipment.
- 20 • Immediately notify the nearest fire-suppression agency of the fire location, action
21 taken, and status (see Section 4.0).
- 22 • Immediately notify the Companies of the fire location and action taken.
- 23 • Relinquish fire-suppression activities to agency fire-management officers upon
24 their arrival.

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

29 **2.2 Restricted Operations**

30 The Contractor will restrict or cease operations in specified locations during periods of
31 high fire danger at the direction of the land-management agency's closure order.
32 Restrictions may vary from stopping certain operations at a given time to stopping all
33 operations. The Companies may obtain approval to continue some or all operations if
34 acceptable precautions are implemented. A written waiver must be issued to the
35 Contractor.

36 During periods of high fire danger, the Contractor will monitor daily for local restrictions.
37 It is the Contractor's responsibility to ensure personnel are aware of and following area
38 fire orders.

1 **2.3 Monitoring**

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

5 To help reduce the potential for fire starts during construction of the Project, the
6 Companies will implement or require the construction Contractor to implement the
7 environmental protection measures (EPMs) contained in Appendix Z of the Plan of
8 Development currently being discussed with the Agencies. When these discussions are
9 completed, finalized measures will be listed herein.

10 **3.0 OPERATION AND MAINTENANCE**

11 **3.1 Operation**

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

18 **3.2 Maintenance**

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

23 To help reduce the potential for fire starts during the operation and maintenance of the
24 Project, the Companies or their Contractor will implement the finalized EPMs.

25 **4.0 NOTIFICATION PROCEDURES**

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

31 If a reported fire is controlled but not extinguished, the fire guard will call to notify the
32 nearest police/fire authorities using the non-emergency telephone line to alert them of
33 the situation. The status of the fire will be monitored by the Contractor, and the nearest
34 fire-suppression agency will be notified.

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

37 To assist with the notification and reporting of fires, the Companies or their Contractor
38 will implement the finalized EPMs.