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Input from the Utah Division of Forestry, Fire & State Lands (FFSL) Regarding Rocky Mountain Power's (RMP) Wildland Fire Protection Plan (WFPP)

The Division of Forestry, Fire & State Lands appointed several staff members to act as reviewers of the WFPP developed by Rocky Mountain Power beginning in March of 2020 as it was being drafted. RMP invited this group to a series of three meetings aimed at reviewing, collaborating and providing input to the plan developers at RMP. Through the process FFSL staff provided guidance on practices, standards and terminology. The following summarizes the input given:

- The methods used in the early draft for evaluating risk were sound, but FFSL staff advised that other, more sophisticated risk analyses models be used. RMP responded in their final plan by refining their risk analysis to include a very thorough analysis driven by the best climatological, fuels, and fire history data through vendor, REAX.
- Outages due to fault events are a known cause of wildland fires. The plan addresses fault events and their frequency/location data to drive the plan's direction in operational practices like hot work, inspection, vegetation management and system hardening. This, along with the identification of high-probability areas appears to be a valid approach to prioritize the work done in these categories.
- For field operations, the risk-mitigation direction for their staff and/or contractors may reduce risk of wildfire.
- The plan lays out proposed intervals for inspection and correction that, if followed, will detect and correct faults sooner than in the past which may reduce the risk of wildfire. The Division advises RMP to follow these intervals and to continue evaluating the appropriate inspection and correction timeframes. Shorter intervals for both inspection and correction for conditions that present a fire risk may be appropriate.
- FFSL's input given during the drafting of the plan included a discouragement in the use of herbicide unless the vegetation was removed to mineral soil since plants killed by herbicide will result in drier fuel conditions. The final plan takes this advice into account, calling for herbicide only in pole clearance and takes into account the need to completely remove vegetation that may be receptive to a ground fire start.
- The plan outlines a new Wildlife Protection section that may reduce the ignition of fires due to birds and rodent incidents including nesting and animal contact with live power. The plan also takes into account the advice FFSL gave to RMP regarding coordinating with public land management agencies in fuel break construction and right of way maintenance. This may result in smaller fires and safer fire-suppression.

- The plan calls for several “system hardening” programs that will likely result in fewer faults and fewer fire ignitions. These programs were reviewed and found to be very promising in terms of fire prevention.
- The situation awareness portion of the plan was reviewed in detail and RMP contractors followed FFSL’s advice in consulting with fire managers from various agencies to determine the best locations for their remote weather stations. These stations will increase overall situational awareness and be useful for fire prevention and suppression. Having the weather stations connected to MesoWest will enable fire managers to use the weather data in their decision-making. The plan for remote cameras was reviewed and RMP followed FFSL’s advice to install the cameras as part of the multi-state fire camera system known as “Wildfire Alert”. The locations selected for the cameras were carefully reviewed and found to be concentrated in areas within constant and saturated public view. FFSL advised that cameras be situated in areas where public reporting of wildfires is less likely. The overall plan to place the cameras is very likely to enable timelier reporting of fires and, will in-turn, shorten fire suppression response times. RMP continues to consult with the division on camera placement.
- Public Safety Power Shutdowns (PSPS) may reduce the risk of fire ignitions, especially during weather events known to drive extreme fire behavior. FFSL advised RMP related to weather modeling and suggested other weather data entities to consult with in deciding what may trigger a PSPS.

The Division of FFSL was invited early in the planning process to advise RMP during the drafting of the plan. During this process, several key points were made and input was given by fire managers and planners. The advice was always taken objectively and nearly all of it was incorporated into the final document. In its final form, the plan is acceptable to the Division and it is the opinion of our leadership that the result will be fewer wildfire ignitions and smaller, less expensive wildfires overall.

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