



State of Utah

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Department of Natural Resources  
Division of Forestry, Fire & State Lands

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November 9, 2023

**Via Electronic Filing**

Utah Public Service Commission  
Heber M. Wells Building  
160 East 300 South, 4th Floor  
Salt Lake City, UT 84111  
[pcs@utah.gov](mailto:pcs@utah.gov)

RE: Docket No. 23-035-44 – FFSL input on Rocky Mountain Power's 2023 Utah Wildfire Protection Plan

Dear Commissioners:

The Utah Division of Forestry, Fire and State Lands submits its input on Rocky Mountain Power's 2023 Utah Wildfire Protection Plan for the Public Service Commission of Utah's consideration. Input is made in accordance with Utah Code § 54-24-201(3)(b)(ii)(A) and Utah Administrative Rule 746-315-2(2).

Jamie Barnes  
Director/State Forester  
Division of Forestry, Fire, & State Lands  
State of Utah

CC: Service List  
Attached: FSSL Comments, Exhibit 1



The Utah Division of Forestry, Fire and State Lands (“FFSL”) submits the following input on the Wildfire Mitigation Plan filed with the Public Service Commission of Utah by Rocky Mountain Power (“RMP”) on September 25, 2023. FFSL’s input is made pursuant to Utah Code § 54-24-201(3)(b)(ii)(A) and Utah Administrative Rule 746-315-2(2).

## **I. Risk Modeling and Drivers**

Section 1 of the plan outlines the base data and methods utilized by RMP to assess areas of high wildfire risk.<sup>1</sup> The datasets relied on are outdated, and as such do not accurately reflect the actual wildfire risk in Utah. Data relied on to determine Fire High Consequence Areas (“FHCA”) should be accessed from the most up to date and reliable sources available.

Specifically, the RMP and their consultant, Reax Engineering, utilize LandFire Fuel Data from 2014.<sup>2</sup> LandFire datasets from 2020 and 2022 are available and would better reflect the current fuelscape.<sup>3</sup>

The Climatology and Historic Fire Weather Days data used to determine the FHCA are from 2017.<sup>4</sup> A new data pull or refresh would give better insight into our most recent climate data.

The Structure Density was determined from 2010 U.S. Census Data, more than a decade old.<sup>5</sup> As such, it vastly understates the population of Utah. According to the U.S. Census Bureau the population for Utah in 2010 was 2,763,885<sup>6</sup> and in 2020 it was 3,271,616,<sup>7</sup> a difference of

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<sup>1</sup> See RMP Plan, Section 1, Page 3

<sup>2</sup> RMP Plan, Table1, page 6

<sup>3</sup> Accessible at <https://www.landfire.gov/viewer/>

<sup>4</sup> RMP Plan, Table1, page 6

<sup>5</sup> Id.

<sup>6</sup> <https://www.census.gov/quickfacts/fact/table/UT/POP010210>

<sup>7</sup> <https://www.census.gov/quickfacts/fact/table/UT/POP010220>

507,731 people. Utah was the fastest growing state in the nation from 2010 to 2023.<sup>8</sup> The U.S. Census estimates the population of Utah for July 2022 at 3,380,800 people.<sup>9</sup> By relying on 2010 U.S. Census data, the plan likely omits significant new construction in the Wildland Urban Interface.

FFSL maintains a Wildfire Hazard Potential (“WHP”) dataset. This dataset represents an index that quantifies the relative potential for wildfire that may be difficult to control. WHP can be used as a measure to help prioritize where fuel treatments may be needed and is current as of 2022. Another dataset that FFSL maintains is a Wildfire Suppression Difficulty Index (“SDI”). Said dataset is a quantitative rating of relative difficulty in performing fire control work. SDI factors in topography, fuels, expected fire behavior under severe fire weather conditions, firefighter line production rates in various fuel types, and accessibility (distance from roads/trails) to assess relative suppression difficulty. These datasets, and others maintained by FFSL,<sup>10</sup> are public records, accessible at <https://wildfirerisk.utah.gov/> or via public records request pursuant to the Government Records Access and Management Act.<sup>11</sup>

FFSL has produced a map with PacificCorp powerline information<sup>12</sup> overlaid on the highest hazardous fuels ranking by watershed. The map, titled “PACIFICORP Power Line Risk”, is attached to these comments as Exhibit 1. Comparing the PACIFICORP Power Line Risk Map produce by FFSL with the FHCA Map<sup>13</sup> included in the plan, demonstrates that

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<sup>8</sup> <https://worldpopulationreview.com/state-rankings/fastest-growing-states>

<sup>9</sup> <https://www.census.gov/quickfacts/fact/table/UT/PST045222>

<sup>10</sup> For further information on FFSLs datasets including details on the Utah wildfire risk assessment model and source data see <https://ffsl.utah.gov/fire/utah-wildfire-risk-assessment/>

<sup>11</sup> See Utah Code § 63G-2-101 *et seq.*

<sup>12</sup> The infrastructure data is from the Homeland Infrastructure Foundation-Level Data (HIFLD) (<https://hifld-geoplatform.opendata.arcgis.com/>). FFSL displayed powerline data identified as PacifiCorp, as the data did not differentiate RMP lines specifically.

<sup>13</sup> RMP Plan, Figure 3, page 8

RMP's reliance on outdated data<sup>14</sup> has excluded significant areas of high wildfire risk. FFSL respectfully requests that RMP includes the FFSL Wildfire Hazard Potential and Wildfire Suppression Difficulty Index datasets in determining the FHCA.

Furthermore, the modeling tools used by the consulting firm in determining the FHCA are not specified in the plan. Without additional information about the specific tools utilized, FFSL is unable to verify the accuracy of the risk modeling. Identifying the modeling tools or methods would indicate whether there is scientific backing behind it or that an acceptable industry standard tool was leveraged.

## **II. Vegetation Management and Environmental**

Section 3.4 of the plan indicates that RMP intends on partnering with local, state, and federal agencies, as well as conservation organizations and private landowners to “participate in forest health projects that span beyond rights-of-way.”<sup>15</sup> These efforts are commendable, however the nature of the collaboration is overly vague.

The plan does not indicate where or which FHCA would be prioritized for these landscape scale projects. Nor does it specify how the included collaborating parties will accomplish the projects, how funds will be leveraged, how crews will be mobilized, etc. Ideally, this section of the plan would go into greater detail on timelines and actions achievable by the involved partners. FFSL has a Deputy Fire Management Officer (“FMO”) for fuels and mitigation projects. RMP should coordinate efforts with the state through the Deputy FMO.

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<sup>14</sup> See also RMP Plan, Appendix A, page 123 for examples of outdated data

<sup>15</sup> RMP Plan, page 44

### **III. Situational Awareness**

FFSL commends RMP for its plan to substantially expand its weather station network.<sup>16</sup> Such efforts will have a significant impact on preparing for and responding to wildfires throughout the state. Furthermore, making the data available to public safety partners through a Situational Awareness website<sup>17</sup> is an excellent cooperative effort. FFSL looks forward to utilizing that real time data.

Figure 28 purports to show an area near Cedar City, Utah,<sup>18</sup> however, the figure shows an area near Mount Shasta, California. FFSL is interested to see the FireSim output from Cedar City that is referenced in the plan.

Section 5.5 of the plan outlines RMP's plan to install and utilize additional Wildfire Detection Cameras. While FFSL agrees that a new camera system can be an effective tool, the plan is vague as to local county emergency management and FFSL's involvement in the process. More details are needed regarding the timeline for site selection and camera installation, as well as the extent and scope of how RMP plans to consult with FFSL and other agencies.

### **IV. Field Operations & Work Practices**

RMP outlines procedures and restrictions for conducting field work in Section 7.1.<sup>19</sup> Included in that section is a disclaimer that the outlined process is subject to change. FFSL recognizes the need for flexibility when facing difficult and dynamic situations, and changes to internal plans and programs over time. However, if RMP deems it necessary to deviate from the outlined plan, there must be some process for notice to the Public Service Commission, FFSL,

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<sup>16</sup> RMP Plan, page 61

<sup>17</sup> RMP Plan, page 64

<sup>18</sup> RMP Plan, Figure 28, page 66

<sup>19</sup> RMP Plan, page 78-79

and other key stakeholders. Furthermore, the plan should outline a baseline for operation restrictions, and any modifications should be made with the intent to be more conservative or protective.

#### **V. Public Safety Power Shutoff Program**

Regarding Public Safety Power Shutoff (“PSPS”) event notification, the RMP plan indicates that customers and local government representatives will be provided with advanced notice as feasible.<sup>20</sup> Notice of any PSPS event should also be provided to appropriate State representatives, including FFSL. Federal agencies should also be notified as applicable to the specific PSPS event.

#### **VI. Public Safety Partner Coordination Strategy**

Under Section 10.2, RMP states “No workshops were planned for 2023 and none were held in 2022.”<sup>21</sup> Likewise, Section 10.5 states, “Currently, Rocky Mountain Power is not planning to conduct a functional exercise in Utah in 2023.”<sup>22</sup> Section 10.7 indicates that in 2023, RMP held sixteen tabletop exercises,<sup>23</sup> however, the following table<sup>24</sup> and figure<sup>25</sup> show eleven and thirteen tabletop exercises in Utah respectively.

Regarding all training activities that involve community partners, the plan outlines that various programs are available, but does not include any actual plans for the upcoming years. Understanding that some details such as dates and locations may not be readily available, the plan should, at minimum, include target metrics for each category included (workshops, tabletop

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<sup>20</sup> RMP Plan, page 92

<sup>21</sup> RMP Plan, page 102

<sup>22</sup> RMP Plan, page 103

<sup>23</sup> Id.

<sup>24</sup> RMP Plan, Table 21, page 104

<sup>25</sup> RMP Plan, Figure 44, page 104

exercises, CRC demonstrations, and functional exercises). Furthermore, the plan should indicate which agencies or organizations should be invited to participate in the specific training activities.

FFSL commends RMP for its willingness to share critical information to public safety partners, as outline in Section 10.8.<sup>26</sup> FFSL looks forward to the planned web-based portal for PSPS events.

#### **VII. Wildfire Safety & Preparedness Engagement Strategy**

FFSL is interested in collaborating with RMP in its public outreach goals.<sup>27</sup> FFSL has undertaken significant efforts in public outreach through its Fire Sense campaign.<sup>28</sup> A combined outreach effort from FFSL and RMP could be an effective way to educate the public and reduce wildfire risk. FFSL employs Fire Prevention Specialists that coordinate and oversee public outreach specific to wildfire reduction and risk. The Fire Prevention Specialists are eager to engage with RMP in a public outreach partnership.

#### **VIII. Plan Monitoring & Implementation**

The plan cites Utah Code § 54-25 as containing the statutory requirements for this plan,<sup>29</sup> however that is the incorrect statute. The statute governing utility wildfire mitigation plans is Utah Code § 54-24-101 *et seq.*

Section 13 of the plan also indicates that RMP intends to expand its wildfire mitigation capabilities as it implements this plan.<sup>30</sup> RMP also indicates in Section 14 that it intends on refreshing the FHCA Map. As noted above, RMP should include wildfire risk data from FFSL as it moves forward in new modeling technologies and in updating the base data it relies on.

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<sup>26</sup> RMP Plan, page 105

<sup>27</sup> See RMP Plan, Section 11, page 106

<sup>28</sup> See <https://utahfiresense.org/>

<sup>29</sup> RMP Plan, page 117

<sup>30</sup> RMP Plan, page 117

It should be noted that some base data relied on in this plan is sourced from California.<sup>31</sup> Local data is available from the Utah Geospatial Resource Center (“UGRC”).<sup>32</sup> To every extent possible, UGRC data should be incorporated into this plan as it will be more accurate and specific to Utah.

#### **IX. Compliance with Statutory and Regulatory Requirements**

Utah Code § 54-24-201(2) and Utah Administrative Rule 746-315 contain the requirements for this plan. In all areas except one, and taking all the above comments into consideration, the plan appears to meet statutory and regulatory requirements. The one requirement not sufficiently addressed is “a description of potential participation, if applicable, with state or local wildland fire protection plans.”<sup>33</sup>

While RMP outlines certain coordination efforts with public safety partners and other government agencies,<sup>34</sup> it fails to address potential participation with state or local wildland fire protection plans. Ideally, RMP would indicate how it intends to integrate itself into specific community wildland fire protections plans throughout the state. FFSL’s Deputy FMO over fuels could assist RMP in coordinating with local agencies.

#### **X. Conclusion**

FFSL requests the Public Service Commission consider this input as it evaluates whether RMP’s plan is reasonable and in the public interest, and whether the plan appropriately balances the cost of implementation with the risk of a potential wildland fire.<sup>35</sup> FFSL submits that

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<sup>31</sup> RMP Plan, Appendix A, page 123

<sup>32</sup> See <https://gis.utah.gov/>

<sup>33</sup> Utah Code 54-24-201(2)(i)

<sup>34</sup> See RMP Plan, Appendix B, page 127

<sup>35</sup> See Utah Code § 54-24-201(3)(c)



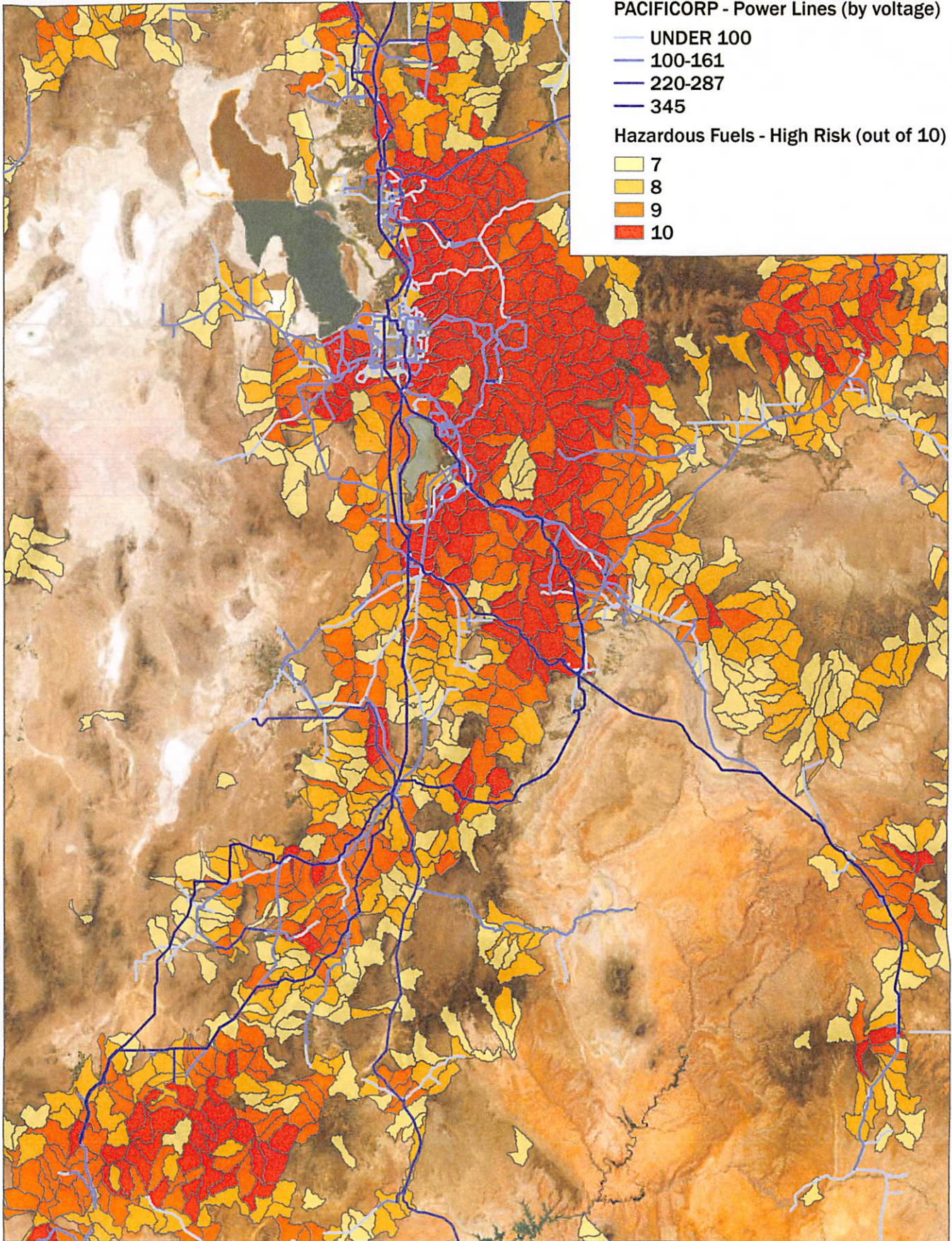
without accurate and current data informing the FHCA, the plan does not fully reflect the actual risk for wildfire and how it interfaces with RMP's system.

Utah Code § 54-24-201(4) requires RMP to “submit to the commission a report detailing [RMP's] compliance with [RMP's] wildland fire protection plan” annually. Additionally, under Utah Code § 54-24-202(2) RMP “shall file an annual report to the commission identifying the actual capital investments and expenses . . . and a forecast of the capital investments and expenses . . . to implement a wildland fire protection plan.” FFSL respectfully requests a copy of those annual reports, or any other report or filing related to the wildfire protection plan, be served to FFSL and its counsel.

# EXHIBIT 1



# PACIFICORP Power Line Risk



**Certificate of Service**

Docket No. 23-035-44

I certify that on November 9, 2023, a true and correct copy of the foregoing was served upon the following as indicated below:

By Email:

Public Service Commission ([psc@utah.gov](mailto:psc@utah.gov))

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