

To Whom It may Concern,

Hello, my name is Sam Myers. The B2H transmission line brings about multiple issues that Idaho Power Company (IPC) has not adequately addressed. Their Wildfire Mitigation Plan is incomplete, they have failed to obtain accurate data for the line, and they have not correctly assessed the risk in Morrow County to protect Oregon's land and citizens.

I am writing to express my deepest concerns and frustrations with IPC's UM 2209 Wildfire Mitigation Plan. In particular, the plan fails to cover risks associated with fires igniting the assets of cattle and growing crops. I have assets that are not protected in any way from fires. IPC has an incomplete fire mitigation plan, especially with regard to growing crops under the B2H transmission line. I have brought up the issue multiple times as an intervenor, but have been brushed aside. IPC claims that there is minimal risk for the transmission line igniting my growing mature wheat crops; however, "low risk" is not the same as zero risk. IPC admits there is some risk and that is the problem: the introduction of the smallest risk can create the most devastating fires. IPC has also failed to acknowledge the soil damage that occurs when a fire burns our soils. The soils in this cropping system are damaged for many years while the slow rebuilding process occurs. This rebuilding process interferes with the yield capabilities of the soil. The impacted yields in turn impact our financial livelihoods. IPC is side-stepping the responsibility of mitigating these disasters. It is unbelievable that these contingencies remain ignored. When B2H causes a fire both IPC and the OPUC will face culpability issues because we have tried to warn them of the fire events but no one listens. Fire events will become one of the largest governing failures in the history of citing transmission lines.

IPC has failed to properly collect data and monitor actual wind speeds along the proposed B2H transmission line. Real-time wind meters, strategically placed along the transmission line, could report to headquarters in real time. They could provide instantaneous wind readings and provide the opportunity for Idaho Power to measure and assess the rapid increases in wind speed in Morrow County.

The other huge concern of mine is that IPC has not categorized the local area in Morrow County as a high risk Zone. In my filings before the OPC, I have evidence proving that our area should be rated high risk for fires. This risk is evidenced by the frequency of Red Flag Warnings in our area. Documentation of the Red Flag Warnings are shown below. Morrow County has the same number of Red Flag Warnings experienced in other areas that IPC has listed as high risk. This evidence can be found in my PUC filings: Oregon Public Utility Commission PCN5 Intervenor Cross-answering and Rebuttal Testimony Sam Myers March 20, 2023 page 15-17.

## Red Flag Warning

A Red Flag Warning means warm temperatures, very low humidities, and stronger winds are expected to combine to produce an increased risk of fire danger.

-If you are allowed to burn in your area, all burn barrels must be covered with a weighted metal cover, with holes no larger than 3/4 of an inch.

-Do not throw cigarettes or matches out of a moving vehicle. They may ignite dry grass on the side of the road and become a wildfire.

-Extinguish all outdoor fires properly. Drown fires with plenty of water and stir to make sure everything is cold to the touch. Dunk charcoal in water until cold. Do not throw live charcoal on the ground and leave it.

-Never leave a fire unattended. Sparks or embers can blow into leaves or grass, ignite a fire, and quickly spread.

We have requested and received from the NWS all of the Red Flag warnings issued in the months of June - August for the years of; 2018, 2019, 2021. The months of July - September for the year; 2020, 2022.

We added into those specific years only the days which had a warning attached to that day, if the warning covered 3 days we then counted only those 3 days for the given issuance. Our totals are as follows;

- 2018 = 16 days
- 2019 = 14 days
- 2020 = 19 days
- 2021 = 16 days
- 2022 = 12 days.

This data does not include the months of May or October in any of the years, nor does it include the month of June in 2020, 2022. It is quite possible to have Red Flag warnings issued for these months, however the data that we have compiled serves to underscore the risks we face.

IPC has consistently ignored this Red Flag Warning data. The frequency of these warnings are among the highest levels of issues anywhere in Oregon. It is difficult to understand why with this kind of evidence that IPC would refuse to acknowledge the high risk nature that Morrow County experiences when it comes to fires. These unresolved issues are huge concerns. They reveal the incomplete nature of the Wildfire Mitigation Plan, and the inability of IPC to provide safety and reliability to those impacted by B2H. Because this document has been incomplete from its origin, it should face the General Public's scrutiny before its adoption.

Truthfully,

Sam Myers, Terri Myers