

OREGON DEPARTMENT OF FORESTRY
PROTECTION FROM FIRE PROGRAM
2600 STATE STREET, SALEM, OREGON 97310

May 22, 2006

Oregon Public Utility Commission
Attn: Filing Center
P. O. Box 2148
Salem, OR 97308-2148

RE: OPUC Docket No. AR 506 - Public Comment in the Matter of Rulemaking to Amend and Adopt Permanent Rules in OAR Division 24 Regarding Vegetation Clearance Requirements

This document contains public comments pursuant to a proposal by the Oregon Public Utility Commission (OPUC) to adopt Oregon Administrative Rule (OAR) 860-024-0016. The original and one copy are being mailed to the OPUC and one electronic copy is being concurrently filed with the PUC Filing Center.

The Oregon Department of Forestry (ODF) has a Protection From Fire program that provides a complete and coordinated wildfire prevention and suppression system to nearly 16 million acres of private, state and federal forestlands throughout Oregon. This system is the largest fire response organization in the state. Each year, ODF suppresses an average of 1,200 fires which burn across approximately 22,000 acres.

In the past ten years, ODF has suppressed an average of 37 fires which were determined to have been related to the presence of powerlines. The number of these fires which had their origin due specifically to inadequate vegetation clearance has not been documented, however, the number is believed to be significant. Given the right set of conditions and location, fires resulting from inadequate vegetation clearance can be sizeable in terms of acreage burned, damage and cost to suppress. The East Antelope Fire, for example, burned across 1,700 acres and cost in excess of \$3.7 million to suppress. This fire occurred on August 13, 2002, east of Ashland when a high capacity conductor sagged into vegetation on a hot day.

ODF has worked with the OPUC's Utility Safety and Reliability staff on a continual basis for over ten years, to cooperatively address the issue of vegetation clearance in the vicinity of conductors. In 1994, for example, the OPUC and ODF staffs jointly conducted a series of statewide training sessions designed to better inform the utility industry, ODF and OPUC personnel on conductor related wildfire prevention issues. The response of the OPUC staff to ODF's fire prevention concerns has been consistently rapid, comprehensive and highly effective.

General comments on the OPUC proposal:

ODF's Protection From Fire program completely and unconditionally supports the maintenance and clearance related amendments to OAR 860-024-0016. We believe these modifications will be very effective in preventing wildfires.

Previous ODF comments:

On May 10, 2006, ODF's Urban and Community Forestry program also provided comments on the proposed amendments. Those previous comments relate to conductors located in urban settings. The comments in this letter relate to conductors located in rural and wildland settings, where the risk of a catastrophic wildfire is greatest.

Sincerely,

- signed -

Richard Gibson

