

May 31, 2023

Oregon Public Utility Commission
Re: Docket UM 2209

To Whom it May Concern

I have followed closely the progression of Idaho Power's B2H project and am participating in the Docket No. PCN5. I have studied the potential of wildfire in Morrow County and how IPC intends to mitigate wildfire risks.

Idaho Power's risk assessment conducted in the area of Mr. Sam Myers' dryland wheat operations near Carpenter Butte (Lat. 45.564° Long. -119.471°) indicates no fire risk. The lack of consideration of this windy, low humidity location and the inability of the Landfire tool to distinguish the seasonal changes in fuels coupled with the everchanging crop status should influence the Fire Potential Index (FPI). However, IPC is unable to correctly characterize the changing fuels and fire risk of the landscape under B2H with the tools it has chosen to use. Furthermore, the use of their Weather Research and Forecasting tool (WRF) is in question of reflecting the true wind component in the rural, unique area of Mr. Myers agriculture operations.

The other component of the FPI is Consequence. Currently, consequence is People and Structures. There is no consideration of the value of crops, chem fallow or soil as an element of consequence. Without consideration of how a landowner will suffer from the loss of a two-year investment in production, a fire impact would be the same or more than structures. The same concerns have surfaced for the consequence of livestock in ranching operations. Please note the attachments that substantiates the importance of croplands in the FPI (see Letters of Mr. Roger Morter **Exhibit 1** and Mr. John Myers **Exhibit 2**).

IPC has full control of altering the data as it sees fit. This creates an element of uncertainty within the forecasting model because the entire process is completed internally, without oversight. The lack of transparency questions IPC's integrity.

IPC has chosen to disregard one of the industry standards of using Red Flag Warnings as an indication of fire risk and community protection. This also plays out significantly in terms of public awareness. The community is accustomed to the issuance of Red Flag Warnings and the cautions recommended. Mr. Steve Rhea, Heppner Fire Chief in Morrow County, has shared this concern of IPC not utilizing Red Flag Warnings for wildfire prediction and prevention (see Attachment of Red Flag warning information **Exhibit 3** Oregon Public Utility Commission PCN5 Intervenor Cross-answering and Rebuttal Testimony Sam Myers March 20, 2023 page 15-17.).

The OPUC is the final governing authority for Wildfire Mitigation Plans and is directly responsible if the plans do not succeed. The OPUC is Oregon's last line of defense in protecting its citizens and lands from Wildfire.

Exhibit 1: Letter from Roger Morter “To Whom It May Concern: Below is the account of the effect and subsequent aftermath that fire had on soil used for wheat production on my farm in Morrow County, Oregon and is an example of the long term danger posed by fire risk. In August of 2012 there was a fire that occurred on approximately 10 acres of a field that I own and that I have farmed since 1985. The fire was due to an ignition caused by a passing car on a nearby roadway. As previously mentioned the fire burned the remaining residue that was left after harvest (4-5 weeks prior to fire, the field was harvested). Due to the protection of the residue being removed and the heat of the fire the soil was subsequently damaged by reduction in both the lack of the conservation action that is normally due to residue coverage, and the heat killing the microbial population that lives in the top soil. In addition, the damaged acres were more subject to noxious weed populations also as a result of the removal of the residue. As a result of these conditions the next crop year produced approximately 21% less crop yield than comparable acres. The second crop year the yield was approximately 14% less. The third crop year the yield was approximately 6% less. The fourth crop year the soil was almost back to “normal”, however the noxious weeds were still present and not fully in control due multiple crop years where the crop failed to thrive. Between the loss of crop production as well as the increase cost of weed control these acres were farmed at a loss for a total of 8 years. Had this been a wide spread event on more than just small acreage, such an event would be mortally damaging to the livelihood and sustainability to dry land wheat farm. Thanks to new conservation practices and no till or minimum till farming the residue left on the ground after a crop is harvested not only serves as a barrier to wind and rain erosion (protecting the top soil) but it also acts as a natural barrier to noxious weed populations. The protection of this residue is of paramount importance to a sustainable farming system. Putting this resource at risk is putting valuable land and resources in jeopardy which will have a chain reaction on the ecosystem as a whole.” Direct Email from Roger Morter, 2021



Exhibit 2: John E. Myers Testimony - March 18, 2023

For many years we have battled rye in our wheat fields. We were eliminating the problem by pulling or cutting / packing the heads out of the field in sacks. But one spot we just could not control and fire seemed to be the only solution. We were using a crop / fallow cropping system and during the 1981 wheat harvest of Township 1 North, Range 27 East - Sections 17 and 8, we decided to combine/harvest the wheat up to the edge of the rye patch which was near the Southwest corner of section 8. After harvest we had a 5+ acre patch of dense rye with stunted wheat that was ringed with two passes of our disc plow. On the morning of August 11, 1981, with a gentle southerly flow of air we ringed the patch with fire. We used the water truck to control fire in the disced area through the next 3 or 4 hours. At this time we judged the operation a success.

● 1 year later (in a fallow condition) I noticed when rod weeding, a much finer soil texture which lifted very easily in the wind. Well of course, we burned all the straw which would have been incorporated into the soil. That fall we seeded wheat, as usual.

● 2 years after the burn, now at harvest time, that burn patch had sparsely populated, half height, stunted wheat plants with shriveled kernels. With the microbes and organic matter destroyed in that soil, not even weeds grew! We had to admit the decision to burn was a mistake in that it destroyed many soil properties. Now we had to approach this soil MUCH differently, with limited tillage.

● 4 years after the burn the wheat population was better but still suffered half height, stunted plants. I believe we fertilized the entire field with anhydrous ammonia that following fallow year.

● 6 years after the burn we could tell the soil was healing. The wheat was yielding 70 - 75% of close-by wheat in the same field.

● The 8th year was much better. This semi arid region cannot produce yearly crops. Healing of our fire impacted soil can only be accomplished over 4 to 5 crop/fallow sequences, which even at the 10th year we could still see the distinct area of the fire. I spoke with Cascade Agronomics on March 6, 2023 and they have a "Screened Steer Manure" product that they apply on various soils with various conditions / requirements and replenishes microbes and organic matter. The Rep. recommended for a fire repair treatment, 10 tons per acre. The cost per acre of product, application and trucking the product to the field is \$436.50 per acre. These fire acres of which I testify are exactly under the proposed B2H transmission line at mile 25 - 26 in section 8, Township 1N Range 27E



Respectfully
Submitted, John E.
Myers, Pres. Myers
Farm Co., Inc

Exhibit 3:

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.

Neighboring States Identify Wheat as a Wildfire Risks

Both of the nearby counties of Gilliam and Waco list wheat as a wildfire hazard risk.

(UGBs) to provide for urban uses and limit urban-type development on rural resource lands outside of UGBs (State of Oregon, 2020).

County Emergency Management

Gilliam County has recently reviewed their completed Natural Hazard Mitigation Plan (University of Oregon, 2018). This plan addresses wildfire in its Risk Assessment section which has the following to say about the subject:

- Wildfire hazards exist throughout the county but are particularly notable in areas where wheat, other crops, and natural vegetation exist, which includes most of the county.

Table 2.1: Wasco County Hazard Overview

Hazard	General location
Severe Weather	Countywide. Now, includes tornado. Other hazards in this category include ice storm, snow storm or blizzard, and windstorm.
Drought	Countywide
Flood	Many rivers in Wasco County historically flood every few years. These include the White River, the Deschutes River, the John Day River, and the Columbia River.
Wildfire	The entire County is vulnerable to the effects of wildfire. However agriculture, forest/woodland areas, and individuals living in wildland urban interface (WUI) zones are at the greatest risk.
Earthquake	A subduction zone earthquake could have impacts Countywide. Crustal quake events are most likely near The Dalles and northeast of Condon where identified faults exist.
Volcano	Wasco County may be impacted by a volcanic eruption at any time (particularly Mt Hood, but also would be impacted by Mt Adams or Mt St Helens eruptions).
Landslide	Wasco County has several areas where landslides have taken place and many areas that are susceptible to landslides. The slopes above the Columbia River are particularly susceptible.

Source: Wasco County NHMP Steering Committee, Updated October 2017

From: [Wasco County Website](#)

Respectfully submitted,

Wendy King, PCN5 Intervenor