

Supplement Analysis
for the
Hills Creek-Lookout Point Transmission Line Rebuild Project
(DOE/EA-1967/SA-01)

Bonneville Power Administration
Department of Energy



Background

In June 2017, Bonneville Power Administration (BPA) completed the Environmental Assessment (EA) for the Hills Creek-Lookout Point Transmission Line Rebuild (DOE/EA-1967) and BPA issued a Finding of No Significant Impact (FONSI) in September 2017. The project is located in Lane County, Oregon, between the Hills Creek Dam, southeast of Oakridge, and the Lookout Point Dam, located near Lowell. The EA analyzed the potential impacts of rebuilding the 26-mile-long transmission line, including the realignment of the transmission right-of-way in an area prone to rock fall. The project was put on hold for several years. In November 2021, BPA completed a supplemental EA to analyze resource impacts from additions to the project scope, which included placement of backup generators at the Oakridge Substation and additional proposed tree removal. BPA issued a FONSI based on the additional analysis in the supplemental EA in November 2021.

The 2017 EA and 2021 supplemental EA analyzed the effects of rebuilding the transmission line with two- and three-pole wood pole structures, none of which would be wrapped with fire retardant. Since that time, BPA has proposed to replace 26 of the existing wood two- and three-pole structures with light-duty steel two- and three-pole structures and add fire retardant on all of the rebuilt wood pole structures. The addition of fire retardant would protect the new wood-pole structures from damage in areas of wildfire risk. The Hills Creek-Lookout Point transmission line goes through heavily wooded areas that are on the Willamette National Forest or privately owned parcels in timber production.

The transmission line corridor has many hard to access structure locations, where new structures would be flown in by helicopter. Light-duty steel is safer to transport by helicopter than wood poles because the poles are lighter weight. The steel structures also have a longer lifespan, require less overall maintenance, do not require wood preservatives, and are more fire resistant.

This supplement analysis (SA) was prepared to determine whether the proposed installation of light-duty steel pole structures and fire retardant presents significant new circumstances or information relevant to environmental concerns that were not addressed by the 2017 EA and 2021 supplemental EA. The findings of this SA determine whether additional National Environmental Policy Act (NEPA) analysis is needed pursuant to 40 Code of Federal Regulations (CFR) § 1502.9(d) and 10 CFR § 1021 *et seq.*

Description of Structure Modifications

The new light-duty steel poles would be direct replacements for wood poles with the overall transmission structure being in a two- or three-pole H-frame configuration and a similar height as the wood-pole structures originally proposed in the EA. The majority of the steel H-frame structures would be 5 feet taller or shorter than the existing structures. Five structures would be 10 to 15 feet taller and one would be 25 feet taller than the existing structure. Nine structures would be three-pole H-frame

structures and 17 would be two-pole H-frame structures. The light-duty steel poles would have a galvanized finish, which has a dull appearance. The disturbance area for the steel structure installation would be the same as the disturbance area for wood structures.

BPA also proposes to apply a fire retardant armor to all of the new wood pole structures. The fire retardant armor is composed of a wire mesh with a fire retardant coating that activates when heated to insulate the pole and prevent structure failure in the event of a wildfire. The fire retardant armor would extend 12 inches below ground to 8 to 15 feet above ground. The armor would be wrapped around the pole and stapled in. It has a dark gray appearance and would be similar to the dark color of wood poles without the armor.

Analysis

With the use of light-duty steel pole structures in some locations and the addition of fire retardant on new wood pole structures, the effects of the Hills Creek – Lookout Point Rebuild Project would be essentially the same as what was previously analyzed in the 2017 EA and 2021 supplemental EA.

Installation of light-duty steel pole structures would require a similar amount of ground disturbance as the installation of the originally proposed wood structures. The light-duty steel structures would be located in the same locations as what was proposed for the wood structures and the proposed structure heights are consistent with what was originally analyzed in the 2017 EA. The light-duty steel structures are manufactured in sections, which are then bolted together prior to delivery to the structure replacement location. Because the amount of ground disturbance and the installation methods are similar, the material change would not introduce additional impacts to sensitive resources, such as wetlands, waterways, wildlife, endangered species or cultural artifacts, beyond what was discussed in 2017 EA and 2021 supplemental EA. Best management practices and mitigation would still be implemented during construction activities.

The 2017 EA discussed two visual environments in the project area; the first is the urban visual environment within the cities of Oakridge and Westfir. The second is the forested visual environment, which encompasses the majority of the project area, and is characterized by rugged topography and dense forests. Viewers along the transmission line consist mostly of residents, workers, recreational visitors, motorists, bicyclists and pedestrians. Visually sensitive locations are composed of residences, parks and trails with amenities such as picnic tables, boat launches, or restroom facilities, located adjacent to the transmission line.

One of the proposed light-duty steel structure locations is within the urban visual environment, located in the City of Oakridge, between Lane County PUD's Oakridge Substation and W. 2nd Street. The material change from wood to light-duty steel for this structure would not make a noticeable difference to the viewshed here because it is consistent with the current structure height and type. The structure is 10-foot lower in elevation than the adjacent road, W. 2nd Street, so it appears shorter than it is to travelers on that street. This new structure would blend in with the adjacent substation infrastructure and other structures in the right-of-way corridor to the south. Adjacent residences have trees and shrubs that would continue to limit the views of the structure from those residences.

The remaining structure material changes are in the forested visual environment. Structure 9/1, while in the forested visual environment, can be seen from residences in Westfir. This tower is approximately 0.15 miles from those residences and is 250 feet higher in elevation. The light-duty steel replacement

structure would be 5 feet shorter than the existing structure. This structure would not create a dramatic change to the visual environment for the residents of Westfir.

In Buckhead Wildlife Area, five structures would be light-duty steel, instead of the originally proposed wood pole structures. These structures are also of the same height and configuration of what was originally proposed and are in the same locations as the current wood pole structures. The change in material would have a low impact on recreational users at this location because these structures are located 0.8 mile, or more, from the main parking area and restrooms and the new steel poles would be visually consistent with the current use of the right-of-way corridor.

The remaining proposed light-duty steel structures would be at mostly remote locations that are only accessible on trail systems built for BPA transmission line maintenance workers. These areas are mostly on steep slopes at high elevations and are unlikely to be seen by recreational users. Due to the steep topography, they are also mostly obscured from West Boundary Road, which is the nearest main road to this portion of the transmission line. Highway 58 is on the other side of the Lookout Point reservoir and it is possible that travelers on that road could see the new light-duty steel structures intermittently, but the majority of Highway 58 is screened by mature conifer trees and the transmission line is not visible. Recreational users of the reservoir may have views of the light-duty steel poles; however, the viewshed of the transmission line corridor would remain the same and there would not be an increase in light reflection or glare from the new structures as compared to the wood structures analyzed in the EA.

The majority of the new steel poles would be located on US Forest Service (USFS)-managed land in the Willamette National Forest. The USFS had no concerns regarding visual impacts from the material change to light-duty steel (E. Kitayama, pers. comm., US Forest Service, NEPA Planner, May 3, 2022). Overall, because the light-duty steel structures would be installed at the same locations and would be of the same height of what was originally analyzed in the 2017 EA, the visual impacts would remain low.

The fire retardant armor on wood poles would be applied from 12 inches below grade and would extend from 8 to 15 feet up on the above ground portion of the poles. In addition to the fire retardant armor, BPA would still require pole wraps on the underground portion of the poles to prevent underground leaching of chemicals into aquatic systems. There would be no change in installation methods or ground disturbance associated with the addition of the fire retardant compared to the structures without the fire retardant that were analyzed in the EA. Therefore the impacts to waterbodies, wetlands, fish or wildlife would be consistent to those discussed in the EA. The dark color of the fire retardant armor would be similar to the dark appearance of wood poles without the armor and the visual impacts would continue to be low.

Overall, the proposed material modifications to install light-duty steel structures at 26 structure locations and to add fire retardant armor to the remaining new wood pole structures would result in similar structure height, amount of ground disturbance, and the visual effects. Therefore, these modifications would not substantially deviate from those described in the 2017 EA or 2021 supplemental EA. Overall, the proposed modifications do not represent a substantial change in the project relevant to environmental concerns.

Findings

BPA finds that the proposed activities and potential impacts related to the installation of 26 light-duty steel structures and the addition of fire retardant armoring on wooden structures are similar to those

analyzed in the Hills Creek-Lookout Point Transmission Line Rebuild Final EA (DOE/EA-1967, September 2017) and Supplemental EA (DOE/EA-1967, October 2021). There are no substantial changes in the EA's Proposed Action and no significant new circumstances or information relevant to environmental concerns bearing on the EA's Proposed Action or its impacts within the meaning of 10 CFR § 1021.314 *et seq* and 40 CFR §1502.9(d). Therefore, no further NEPA analysis or documentation is required.

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Concur:

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