

Decision Notice and Finding of No Significant Impact for the Hills Creek-Lookout Point Transmission Line Rebuild Project

USDA Forest Service
Middle Fork Ranger District
Willamette National Forest
Lane County, Oregon

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The project area is located in the Middle Fork Willamette Watershed between the cities of Oakridge and Lowell, Oregon. The legal description of the project area includes the following township, range and sections of the Willamette Meridian:

T19S, R1W, Section 3	T20S, R2E, Sections 7,17-18,20-22,27,35
T19S, R1E, Sections 18-21,27-28, 34-35	T21S, R2E, Sections 1-2,11-12
T20S, R1E, Sections 1-2	T21S, R3E, Sections 1-2,20-22,26-27

Introduction

Bonneville Power Administration (BPA) needs to ensure the integrity and reliability of the Hills Creek-Lookout Point transmission line which serves BPA’s utility customers, who in turn serve communities in western Oregon. No major rebuild work has occurred on the Hills Creek-Lookout Point transmission line since it was originally built in 1953. In general, wood poles for transmission lines have a service life of 55 to 60 years, at which point they are usually replaced due to age, rot, or other forms of deterioration. Most structures on the Hills Creek-Lookout Point transmission line have reached the end of their service life, are physically worn, and, in places, are structurally unsound. As the structures age, emergency repairs are needed more frequently; emergency repairs often times do not allow for time to accommodate planning efforts, such as coordination with landowners and minimization of environmental impacts, and are not an efficient and cost effective approach to maintaining the transmission line. Collapse of any poles on the line could lead to failure of the line, which presents safety hazards to the public and BPA workers, as well as risk of electrical outages that would adversely affect power deliveries to BPA’s customers in western Oregon. Additionally, loose

rock near line mile two (the second mile of the transmission line) substantially damaged structure 2/7 in February 2015. Other rocks in this area could damage the structure in the future if it is not relocated. Similarly, three structures in line mile three are susceptible to landslide damage if not relocated.

The purposes are goals to be achieved while meeting the need for action. BPA has identified the following purposes to help evaluate the proposed alternatives for the Hills Creek-Lookout Point transmission line rebuild project (Rebuild Project):

- Maintain or improve transmission system reliability to BPA and industry standards
- Continue to meet BPA's contractual and statutory obligations to supply safe, reliable power to serve its customers
- Minimize environmental impacts to the surrounding area
- Demonstrate cost-effectiveness of rebuilding the transmission line instead of performing repairs on an as-needed basis

The environmental assessment (EA) documents the analysis of two alternatives to meet this need.

Decision and Reasons for the Decision

Based upon my review of all alternatives, I have decided to implement the Proposed Action which includes replacement of the wood-pole structures that support the Hills Creek-Lookout transmission line, replace various other line components, and enhance the road and foot trail system that allows BPA access to the line.

The Proposed Action will include the following:

- Removal and replacement of all wood-pole transmission line structures
- Realignment of the transmission line in line mile two within the Willamette NF
- Realignment of the transmission line in line mile three within the Willamette NF
- Replacement of wood-pole structures with steel monopole structures in line mile five
- Replacement of existing conductors, overhead ground wire, and *counterpoise* (a series of wires, grounding rods, or both)
- Replacement of two disconnect switches
- Establishment of a temporary material storage yard, helicopter landing pads, and *tensioning sites* (for pulling and tightening conductors)
- Enhancement of the access road and trail system
- Acquisition of new access road rights along the transmission line and new easements in line miles two and three
- Removal of trees and other vegetation (as needed for BPA workers and infrastructure and public safety?).

Decision Rationale

I have decided to implement the Proposed Action because it fully addresses the purpose and need.

By allowing BPA to rebuild the transmission line and realign the segments at risk from rock fall and landslides, the USFS will enable BPA to maintain the transmission line to industry standards. This in turn will allow BPA to meet its contractual and statutory obligations to supply safe and reliable power to its customers. No major rebuild work has occurred on the Hills Creek-Lookout Point transmission line since it was originally built in 1953. At 63 years of age, many of the wood transmission poles have outlived their service life. Most of the wood poles are physically worn, and structurally unsound due to age, rot, or other forms of deterioration which places them at an unacceptable risk of failure. As the structures age, emergency repairs will be needed more frequently; emergency repairs often times do not allow for time to accommodate planning efforts, such as coordination with landowners and minimization of environmental impacts.

Rebuilding the transmission line will also allow BPA to minimize environmental effects to the greatest extent practicable. For example, by scheduling the rebuild, as opposed to responding to emergency repairs, BPA is able to conduct construction activities outside of critical nesting season for northern spotted owl, thereby minimizing effects to the species. Additionally, the planned road improvements will reduce the impacts of erosion and sedimentation along the entire transmission line alignment.

Rebuilding the transmission line during a single coordinated construction effort greatly reduces costs to BPA and its customers. Rather than responding to repairs on an as-needed basis, BPA able to take advantage of economies of scale by rebuilding the entire line at one time. Repairs and mitigations are also planned ahead of time, maximizing interdisciplinary input so as to minimize adverse environmental effects.

Other Alternatives Considered

In addition to the selected alternative, I considered one other alternative. A comparison of these alternatives can be found in the EA in sections 2.4, 2.4, and 2.5.

No Action

Under the No Action Alternative, BPA would not rebuild the transmission line or upgrade access roads, or culverts, as a single coordinated project. Construction activities associated with the Proposed Action would not occur. However, the reliability and safety concerns that prompted the need for the Proposed Action would remain and likely increase. The structures that are currently located in the rock fall area of line mile two and the landslide area of line mile three would be repaired in their current locations, but would be susceptible to future damage from rock falls and landslides. BPA would continue to operate and maintain the existing transmission line in its current condition, replacing aged and rotting structures as they deteriorate, maintaining access roads to allow access to structures on an as-needed basis, and managing vegetation for safe operation.

Alternatives Not Considered in Detail

Section 2.4 of the Draft EA discusses the alternative of rebuilding the transmission line along its existing alignment without the realignments proposed in line miles two and three. This alternative was dismissed from further consideration because the transmission line would have remained susceptible to landslides and potential damage in the rock fall area, thereby jeopardizing the line's reliability and failing to satisfy one of the four stated purposes of the Rebuild Project.

Tribal Consultation

The need for this action arose in 2013. The Rebuild Project was listed in the Schedule of Proposed Actions on September 21, 2015. On March 27, 2014, BPA in conjunction the USFS began Tribal Consultation on the Rebuild Project by writing to representatives of Confederated Tribes of Siletz Indians of Oregon, Coquille Indian Tribe, Confederated Tribes of the Warm Springs Reservation, Cow Creek Band of Umpqua Tribe of Indians, the Confederated Tribes of Grand Ronde, and the Klamath Tribe. The letter explained the purpose and need for the project, provided a map of the project area, and solicited comments on the proposed action. In response to these letters, BPA received a request from the Confederated Tribes of Grand Ronde to research known, suspected, and potential gathering sites for culturally significant plants within the project area. BPA honored this request by funding the tribe to conduct the survey. The Rebuild Project has been included in the Annual Program of work review with the Confederated Tribes of the Grand Ronde, Siletz, and Warm Springs since 2013.

Public Involvement and Scoping

As described in the background, the need for this action arose in August 2013. A proposal to rebuild the transmission line and approve BPA's request to realign two sections of the transmission line was listed in the Schedule of Proposed Actions on September 21, 2015. As part of the public involvement process, BPA conducted public scoping outreach. BPA mailed letters on August 23, 2013, to potentially interested and affected persons, agencies, tribes, and organizations. The public letter provided information about the Rebuild Project and EA scoping period, requested comments on issues to be addressed in the EA, and described how to comment (mail, fax, telephone, BPA's website, and at scoping meetings). BPA also posted the public letter on the webpage project website (www.bpa.gov/goto/HillsCreekLookoutPoint), which it established to provide information about the Rebuild Project and the EA process.

Using the comments from the public, other agencies, and our tribal partners (see *Section 1.5 Public Involvement and Consultation*), the interdisciplinary team identified several issues regarding the effects of the proposed action. Main issues of concern included impacts to streams and riparian habitats, impacts to private lands crossed by the right-of-way, and impacts to northern spotted owls (see EA section 1.5.1). To address these concerns, the Forest Service created the alternatives described above. See Attachment A for a review of all comments and responses.

Finding of No Significant Impact

The following is a summary of the project analysis to determine significance, as defined by Forest Service Handbook 1909.15_05. "Significant" as used in NEPA requires consideration of both context and intensity of the expected project effects.

Context

This decision is consistent with similar activities implemented by the Willamette National Forest, which lead toward achieving the goals, objectives and requirements identified in the Forest Plan for the management areas within the project area, while meeting the purpose and need of the rebuild project. These requirements are fully described in the Willamette Land and Resource Management Plan, Chapter IV and as amended by the Northwest Forest Plan Record of Decision Standards and Guidelines.

This project is limited in scope and duration. The Hills Creek-Lookout Point Transmission Line Rebuild project encompasses about 90 acres which equates to:

- Less than 0.02 percent of the 370,00 acres which lie within the Lookout Point Reservoir, North Fork Middle Fork Willamette River, and Hills Creek Reservoir 5th field sub-watersheds
- 0.012 percent of the approximate 750,000 acres of the Middle Fork Ranger District
- 0.005 percent of the 1.7 million acre Willamette National Forest

The project was designed to minimize environmental effects through project design and the mitigation measures listed in Table 2-5 in Section 2.6 of the Draft EA.

I find that the effects of the project are not significant, as disclosed throughout the Environmental Consequences sections of the EA (Chapter 3), and will have a negligible effect at the watershed, District, and Forest scales.

Intensity

The following factors were considered to evaluate intensity.

1) Impacts may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on the balance the effects will be beneficial.

The Environmental Assessment provides sufficient information to determine that this project will not have a significant impact, adverse or beneficial, on the land and its natural resources. As described in the EA under the Environmental Impacts of the Proposed Action and Alternatives section, adverse effects and the reasons they are not expected to be significant include:

- Threatened and Endangered, and Sensitive Species and other Wildlife- Because most structures and road work would be located in existing areas of disturbance, there would be minimal additional habitat loss due to the Proposed Action (Section 3.6.2 of EA). The new access road construction and the slight realignment of the line in line mile three would convert about 5.5 acres of previously undeveloped habitat to structure sites and access roads; however, the area that would be converted would be at the edge of existing road and cleared right-of-way habitat and would be a relatively small amount compared to existing surrounding undeveloped habitat. Species that could be displaced would be expected to find habitat in adjacent forested areas and impacts from loss of habitat would be low. Additionally, the Proposed Action will include installing or fixing gates, which could improve habitat for deer, elk and other wildlife by limiting motorized access. Limiting vehicular access would reduce disturbance to wildlife and promote conditions that would improve health, reproductive success, and survival rates.
- Botanical Species- The botany Biological Evaluation determination for sensitive vascular plants, lichens, and bryophytes is 'no impact' (Section 3.3.2 of EA). Since no special-status (including ESA-listed plants), sensitive species, or critical habitat were historically documented or found during surveys for the project, there would be no expected impact to these species.
- Aquatic Resources (Streams and Fish)- Traffic on gravel roads during the wet season has the largest potential to deliver sediment to stream channels. However, wood-pole replacement projects usually only involve about eight vehicle trips per day so the amount of fine sediment running off into streams and increasing sedimentation would be low. In addition, the design features such as water bars and cross drain culverts would minimize turbidity and sediment runoff into streams from construction activities. Further, erosion rates would likely return to their current levels once vegetation is reestablished. Given that only three structure

replacements and 0.3 mile of access road work would occur within 100 feet of streams and that the transmission line is generally designed to provide wide spans over waterways, impacts to most drainages would be avoided (Section 3.4.2 of EA).

Potential impacts to resident fish and anadromous fish could occur due to changes in stream habitat or water quality (sedimentation, shade or cover removal, contamination) or from direct disturbances to individual fish during in-water work activities. Although Chinook salmon, bull trout, and other fish species may be present within various streams crossed by the transmission line right-of-way and access roads, most construction activities would occur away from streams where both topography and existing vegetation would reduce the ability of sediment to enter adjacent streams, while proposed road and drainage improvements will yield subsequent benefits to fish present in downstream receiving waters. Some in-water work would be required for culvert installations, ford improvements, and temporary construction bridge installations; however, most drainages where this work would occur are intermittent and would be seasonally dry or have very low flow during construction (Table 3-8). Fish salvage activities (removing fish from in-water work/construction areas) could also harm or harass fish, including ESA-listed Chinook. Beneficial effects of the Proposed Action would include improved fish passage and fish access to additional upstream aquatic habitats (culvert C-19-062), improved channel condition and more natural hydraulic conditions at stream-road crossings, reduced sediment inputs to streams based on enhancements to existing access road conditions, and increased access controls (e.g., gates) to minimize unauthorized and off-road vehicle use of BPA access roads.

- Air Quality- Overall, air quality impacts resulting from construction would be low because impacts such as increase dust and vehicle emissions would be limited to the construction site, would be temporary in nature, and would not produce enough dust and contaminants to result in violations of air quality standards (Section 3.11.2 of EA).
- Soils- Impacts to soils would occur due to auguring of structure holes; removal of vegetation; grading of roads; temporary soil piling; compaction or rutting from heavy equipment; spreading of excess soils around the base of the structure; compaction in areas used as storage yards, helicopter landing pads, and tensioning sites; burying guy wires; or potential contamination from wood-pole preservative or accidental equipment spills. Because these would be short-term and occur in a relatively small area, impacts to soils would be low (Section 3.2.2 of EA).

2) The degree to which the proposed action affects public health or safety.

Considering that most of the project located away from local population centers Oakridge and Westfir and that it would eliminate the risks posed by aging and structurally unsound transmission structures, the likelihood of the project affecting the public's health and safety is low.

3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

The areas proposed for ground-disturbing activities have been surveyed and evaluated for the presence of heritage resources. Areas with historic or cultural resources were avoided, buffered, or otherwise protected from the disturbing effects of project construction and yet-to-be discovered sites uncovered during project implementation will result in suspension of operations until appropriately addressed by

the district archaeologist (Appendix D, page 1 and concurrence letter from SHPO in the project record).

There would be no long-term impacts to recreational areas. Temporary disturbances to parks and trails near the transmission line and access roads may include temporary closures of portions of the facilities to ensure the safety of recreational users during construction, traffic delays to access the parks from public roadways, and dust and noise from construction activity.

Of the more than 7 acres of wetland habitat within the project area, 0.8 acre would be permanently impacted and 1.3 acres would be temporarily impacted. Impacts to wetlands would be minimized with mitigation measures including working in the dry season if possible, flagging wetland boundaries, using wetland mats, reseeding disturbed areas, and monitoring disturbed areas for re-establishment of perennial vegetation. Additionally BPA would purchase wetland mitigation credits to offset the permanent impacts.

No prime farmlands, wild and scenic rivers, or ecologically critical areas would be affected by the proposed project.

4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The degree of controversy, with regard to effects on the quality of the human environment, is limited and considered not significant based on comments received during the scoping and the comment periods (EA Section 1.5 and Response to Public Comments, Decision Notice). Differing opinions do not indicate controversy.

This project is based on the best available scientific information and site-specific data. The methodologies used to estimate the effects disclosed in the Environmental Consequences section of the Environmental Assessment are widely used in similar environmental analyses and have been reviewed by the research and academic communities. I am not aware of any credible, peer-reviewed scientific questioning of the methods used in this analysis, nor its results (EA, Chapter 3, Affected Environment and Environmental Consequences Section, pages 3-1 to 3-93).

5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The Bonneville Power Administration has considerable experience with the types of activities to be implemented by this project. Similar types of utility line activities, tree clearing, and road improvement work have occurred on this district, this forest, and other National Forests. Samplings of these projects on this district and this forest have been monitored and have been shown to meet the amended Willamette Forest Plan standards and guidelines. In addition, the analysis in this document shows no impacts to the human environment that are highly uncertain or involve unique or unknown risks that have been identified in Affected Environment and Environmental Consequences Section (EA, Chapter 3, pages 3-1 to 3-93).

6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

The action is not likely to establish a precedent for future actions with significant effects, because the proposed transmission line rebuild and associated activities are within the standards and guidelines analyzed in the amended Willamette Forest Plan and are applicable only to the project area.

7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The Cumulative Impacts Section of this EA (Section 3.13, pages 3-85 to 3-92) evaluates the effects of past, present and reasonably foreseeable actions for the various resources affected by this action. Also, I have reviewed for significance the Affected Environment and Environmental Consequences Section for Past, Present and Reasonably Foreseeable Activities Relevant to the Cumulative Impacts analysis, which describes management activities that have occurred, along with ongoing and future actions. I find that this action will not have a significant cumulative impact on the environment.

8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in the National Register of Historic Places or may cause loss or destruction of significant cultural or historical resources.

The project has been designed to avoid adverse effects to districts, sites, highways, structures, and objects listed in the National Register of Historic Places. Similarly it will not cause the loss or destruction of significant cultural or historic resources. However, with respect to the Hills Creek-Lookout Point transmission line, the realignments in line miles 2 and 3, coupled with the conversion of wood monopoles to steel in line mile five constitute an adverse effect. The Hills Creek-Lookout Point transmission line is a historic resource eligible for inclusion in the National Register of Historic Places as a contributing element to the BPA Pacific Northwest Transmission System. To mitigate this effect, BPA and the Oregon State historic Preservation Office will execute a Memorandum of Agreement (MOA) stipulating how the adverse effects to the transmission line will be resolved.

9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act.

The effects of the Proposed Action on spotted owls and bull trout were consulted with US Fish and Wildlife Service. A Letter of Concurrence (USFWS Reference #01EOFW00-2016-I-0369) has been received with a finding that the project is May Affect, Not Likely to Adversely Affect northern spotted owl and bull trout.

Consultation with the National Marine Fisheries Service will be completed by BPA's submission of an Action Implementation Form through its Programmatic Biological Opinion (WCR-2014-1600).

10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

Laws imposed for the protection of the environment provided the framework for the 1990 Willamette National Forest Land and Resource Management Plan. From the documentation provided in the EA, the project file, and Other Findings Required by Law (below), I find that the proposed activities do not threaten a violation of Federal, State, or local law imposed for the protection of the environment.

Conclusion

After considering the environmental effects described in the EA and specialist reports, I have determined that the Proposed Action will not have significant effects on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared.

Findings Required by Other Laws and Regulations

National Forest Management Act (NFMA)

This decision to rebuild the transmission line, including realigning portions of it on national forest land, is consistent with the intent of the Forest Land and Resource Management plan long term goals and objectives pages IV-2 through IV-12.

The project was designed in conformance with 1994 Northwest Forest Plan and 1990 Land and Resource Management plan standards and incorporates appropriate guidelines for all Management Areas, 14a, 15, 16a, 17 where activities will occur implementing this decision (EA ,page 3-3)

This decision is also consistent with all applicable Acts and Regulations including: National Environmental Policy Act; National Forest Management Act; Final Environmental Impact Statement and Record of Decision for the Willamette National Forest Land and Resource Management Plan; 1990 (as amended); Endangered Species Act; Clean Air Act; Federal Water Pollution Control Act (Clean Water Act); National Historic Preservation Act; Magnuson-Stevens Fishery Conservation and Management Act; Executive Orders 11988 and 11990: Floodplains and Wetlands; Executive Order 12898 – Environmental Justice in Minority Populations and Low Income Populations; Executive Order 13112 (Invasive Species); Executive Order 13186: Migratory Birds; Executive Order 13443: Energy Requirement and Conservation Potential; General Water Quality Best Management Practices Handbook; Oregon State Best Management Practices; NW Forest Plan Temperature TMDL Implementation Strategy-Evaluation of the Northwest Forest Plan Aquatic Conservation Strategy; and the Programmatic Agreement among the USDA, Forest Service Pacific Northwest (Region 6), The Advisory Council on Historic Preservation, and the Oregon State Historic Preservation Officer regarding Cultural Resource management in the State of Oregon by the USDA Forest Service.

Administrative Review/Objection and Implementation

The Hills Creek Lookout Point Transmission Line Rebuild Project was subject to pre-decisional administrative review (objection) pursuant to 36 CFR Part 218, Subpart B. The 45-day objection period begins the day following publication of notice of objection in the Eugene Register Guard, the newspaper of record. The legal was published June 29, 2017 and the objection period ran from June 30, 2017 through August 14, 2017. There were no objections received during the objection period and another letter of support was filed by Betty Jean Keele of the Back Country Horseman of Oregon.

Implementation of this project may occur immediately.

Contact Person

For further information concerning the project, contact Allen Hambrick, Lead NEPA Planner, at 46375 Highway 58 Westfir, Oregon 97492. Phone: (541) 782-5217.

Copies of the Environmental Assessment, the project record, and this Decision Notice/FONSI can be found on the Bonneville Power Administration website at: www.bpa.gov/goto/HillsCreekLookoutPoint

Approved by:

/S/ Duane F. Bishop

Duane F. Bishop
District Ranger

August 22, 2017

Date

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Hills Creek-Lookout Point Transmission Line Rebuild Project Draft Decision Notice and FONSI

Attachment A

Comments Received on Draft EA and BPA's Responses

In order to solicit comments on the draft EA, the EA or a notice of its availability was e-mailed or mailed to over 100 entities—individuals, organizations, tribes, and government agencies. Approximately 60 of the recipients were adjacent landowners. In addition, BPA posted the draft EA on the project website. The comment period ran from August 10, 2016 through September 19, 2016.

BPA received comments from nine entities in writing through letters, comment forms, and the website. Each comment submittal was assigned an identifying number that corresponds to the order it was received. Breaks in the number sequence resulted when comments were deleted because they were submitted in error or had inappropriate content (such as SPAM). Table 1 provides the comment number and the associated author and affiliation. The comments are reproduced in their entirety.

- **Table 1. Draft EA Comment Submittals**

• Comment Number	• Comment Author / Affiliation
HCLP16 0001	Kepler/Lane County Public Works
HCLP16 0002	Maupin
HCLP16 0004	Heiken/Oregon Wild
HCLP16 0005	Chapman
HCLP16 0006	Harding
HCLP16 0007	Pace
HCLP16 0008	Burbank/Oregon Department of Transportation
HCLP16 0009	Gamble/Oregon Department of Transportation
HCLP16 0011	Burleson

Note: Comments HCLP16 0003 and 0010 received by BPA were not related to the scope of the project; therefore these comments are not included.

Comment HCLP16 0001 Keppler/Lane County Public Works

Lane County Public Works staff have reviewed the Draft EA for the proposed Hills Creek-Lookout Point Rebuild Project. Lane County Right of Way Permits are required for construction activities within County Roads and rights of way. Table 2-5, Mitigation Measures for Proposed Action, should be revised to include a bullet item "Coordinate with Lane County Public Works to obtain any Right-of-Way Permits that may be required, if any, for project activities, including hauling, within County Roads and right-of-way. <http://www.lanecounty.org/Departments/PW/Pages/rowpermits.aspx>" under the Land Use, Recreation and Transportation section.

Response to Comment HCLP16 0001

As requested, Table 2-5 in Section 2.6 of the EA has been revised to include the Lane County right of way permits required for construction activities within Lane County roads and rights-of-way. In addition, these permits have been added to Table 2-6.

Comment HCLP16 0002 Maupin

I have these other comments:

*I have no problem with the Hills Creek - Lookout Point Transmission Line Rebuild. Waiting for a longer date/time would cost more.
Good Luck !!*

Response to Comment HCLP16 0002

Thank you for your comments.

Comment HCLP16 0004 Heiken/Oregon Wild



8 Sept 2016

TO: BPA and Willamette National Forest

Submitted Via: <https://www.bpa.gov/applications/publiccomments/CommentEntry.aspx?ID=290>

Subject: Hills Creek-Lookout Point Transmission Line Rebuild —comments

Dear USFS and BPA:

Please accept the following comments from Oregon Wild concerning the Hills Creek-Lookout Point Transmission Line Rebuild,

<https://www.bpa.gov/efw/Analysis/NEPADocuments/Pages/Hills-Creek-Lookout-Point.aspx>.

Oregon Wild represents over 15,000 members and supporters who share our mission to protect and restore Oregon’s wildlands, wildlife, and water as an enduring legacy. Our goal is to protect areas that remain intact while striving to restore areas that have been degraded. This can be accomplished by moving over-represented ecosystem elements (such as logged and roaded areas) toward characteristics that are currently under-represented (such as roadless areas and complex old forest).

Bonneville Power Administration (BPA) is proposing to rebuild its 26-mile long, 115 kilovolt (kV), wood-pole Hills Creek-Lookout Point transmission line generally located between Lowell and Oakridge, in Lane County, Oregon.

0004-1

We urge the agencies to minimize the foot print of this project by avoiding and minimizing new access roads as much as possible. Existing access roads should be maintained to address road drainage and erosion concerns. Steps should be taken to avoid OHV use on access roads and throughout the transmission line rights-of-way.

0004-2

We also urge the agencies to address the spread of weeds which is often associated with transmission line rights-of-way. The sight of bright yellow Scot’s Broom at the base of utility poles is visible for miles. This significantly degrades the view of natural vistas in this area. Existing weeds should be removed. Future weeds should be prevented and/or eliminated as necessary.

0004-3

If any powerpoles are relocated, the new locations should avoid sensitive sites such as wetlands, natural meadows, rock outcrops, mature and old forests, riparian areas, talus, etc.

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Enterprise, OR 97828

0004-3
continued

When powerpole sites are related, the abandoned sites should be left in good condition by decompacting soils, eliminating weeds, and establishing desired native vegetation.

0004-4

The clearings under transmission lines should be managed for wildlife that prefer complex early seral vegetation communities. Diverse native vegetation and some dead wood should be encouraged.

Sincerely,



Doug Heiken

dh@oregonwild.org

Responses to Comment HCLP16 0004

0004-1

Section 2.2.9 of the EA describes the proposed access road improvements, including gates and measures to address drainage and erosion; Table 2-1 (Section 2.2) of the EA includes a summary of road improvements. As described in Section 2.2.9, only about 0.1 mile of new access roads would be constructed; all other access roads used for the project would be existing roads – some in their current condition and others with planned improvements. BPA’s road standards include water bars, drain dips, and cross drain culverts to manage surface water runoff. To limit unauthorized access of off highway vehicles (OHV), BPA proposes to install, repair, or replace 51 gates on its access road system.

0004-2

Section 2.2.13 of the EA describes BPA’s ongoing vegetation maintenance activities, including invasive plant control. As described in Section 3.3.2 of the EA, BPA conducted invasive weed surveys along the transmission line and access roads and acknowledges the potential spread of invasive weeds due to ground disturbing construction activities; Table B-2 in Appendix B of the EA lists the invasive weed species occurring along the line or access road and the general location where they were found. Table 2-5 (Section 2.6) of the EA lists the measures that would be taken to help prevent weed infestations, such a pre- and post- construction weed treatments, inspection or cleaning of construction vehicles, as well as revegetating disturbed areas.

0004-3

For the most part, wood poles would be replaced in the same location in which they currently stand. Only five transmission line structures would be in new locations—these would be in the realignment sections of line miles two and three, as described in Sections 2.2.2 and 2.2.3 of the EA. The new structure locations avoid sensitive areas, such as wetlands, natural meadows, rock outcrops, mature

and old forests, riparian areas, and talus. As described in Section 2.2.9, abandoned segments of BPA right-of-way and abandoned access roads would be rehabilitated and revegetated in coordination with the Forest Service.

0004-4

As described in Section 2.2.11 of the EA, trees identified for removal would be directionally felled away from access roads and left on-site, adding coarse woody debris to the forest floor. All areas disturbed during construction would be reseeded as appropriate, and the Forest Service would provide a seed source for revegetating disturbed areas on Forest Service land. Effects of tree removal and revegetation is provided in Section 3.3.2 of the EA.

BPA has a Memorandum of Understanding with the Oregon Department of Agriculture, Oregon Hunters Association, Corps, and Forest Service regarding cooperative management of vegetation along a segment of the Hills Creek-Lookout Point transmission line located on the north shore of the Lookout Point Reservoir. Text has been added to Section 3.3.1 of the EA describing this Memorandum of Understanding. In addition, text describing right-of-way clearing and revegetation in the realigned segments of line miles two and three where the transmission line has also been added to Section 3.3.2, along with a mitigation measure added to Table 2-5 in Section 2.6 of the EA.

Comment HCLP16 0005 Chapman

I need more information about:

What kind of (or amount of) site prep will be done?

I have these other comments:

Get 'er done! First it was 2015, then 16, then 17 now 18. Just do it.

Response to Comment HCLP16 0005

Site preparation for the project would be limited to access road improvements, vegetation removal, mobilization of equipment, and other construction activities described in Section 2.2 of the EA.

Comment HCLP16 0006 Harding

I would like to know why BPA has decided to hold water back at Bonneville dam during the peak Chinook salmon migration?

Response to Comment HCLP16 0006

Bonneville Dam is owned and operated by the U.S. Army Corps of Engineers (Corps). The dam is a type known as a “run of the river” dam which has minimal capacity to store water relative to the amount of water passing through the river. Thus the Corps is unable to “hold back” significant quantities of water at any time of year. Flow augmentation used to support juvenile salmon migration typically ends in August every year, a time when river flows are naturally low and receding due to dry summer conditions. If you would like additional information regarding operation of the Bonneville Dam and other federal dams on the river you can find that information at the Corps of Engineers Technical Management team [website \(http://www.nwd-wc.usace.army.mil/tmt/\)](http://www.nwd-wc.usace.army.mil/tmt/).

Comment HCLP16 0007 Pace

Canis lupus, listed as endangered in the western 2/3 of Oregon, which includes the entirety of the proposed project, and there are areas in the vicinity of Oakridge that are estimated wolf use areas by FWS. BPA should start by assessing inconsistencies between the project as proposed and ODFW’s updated Wolf Conservation and Management Plan, which is available online at http://www.dfw.state.or.us/Wolves/wolf_program_updates.asp. Your analysis should consider, e.g., impacts of access roads on wolves and potential wolf habitat. But it should not stop there. You should also look at issues like the impact of vegetation management on wolf survival and recovery. To a lesser extent, I think you also have the same problem but to a lesser degree with *Lynx canadensis*. So far as I know, a recovery plan for Canada lynx has not been promulgated. However, the area of potential lynx habitat includes areas that are adjacent to and/or nearby the eastern end of the proposed project. You may have similar concerns with impacts on potential range that should be addressed for *Pekania pennanti*, which is a species of concern. Thankfully, I don’t believe you have a problem with pygmy rabbits. That’s the mammals. There are fish and plants, of course.

Response to Comment HCLP16 0007

As described in Table 2-6 (Section 2.7) of the EA, BPA has consulted with the U.S. Fish and Wildlife Service (USFWS), Forest Service, and Oregon Department of Fish and Wildlife (ODFW) for potential effects to threatened and endangered species, including gray wolves (*Canis lupis*), Canada lynx (*Lynx canadensis*), and Pacific fisher (*Pekania pennanti*). BPA’s analysis determined that the project would have no effect on these species, and BPA received concurrence from USFWS on the Biological Assessment that was prepared. A new table, Table E-3, has been added to Appendix E of the EA. This table comes from the BA BPA submitted to the USFWS and summarizes effect findings for all ESA-listed species known to occur within Lane County.

BPA also evaluated effects to the Pacific fisher through the preparation of a Biological Evaluation (BE), which was submitted to the Forest Service for review. Effects to the Pacific fisher are summarized in Section 3.6.2 of the EA.

Comment HCLP16 0008 Burbank/Oregon Department of Transportation

To whom it may concern, ODOT has reviewed the notice for Hills Creek-lookout point Transmission Line Rebuild (Doe/ea-1967) if new approaches to the state right of way are required an application for road approach to the state highway system will be required. Additionally, if the applicant anticipates work within the state highway right-of-way, they will need to contact Jeff Prociw at (541) 726-2526 in the ODOT District 5 Maintenance Office to discuss the type of work and to obtain any necessary permits for work within the state highway right-of-way. If vehicles are to be over-sized or over weight please contact Motor Carrier for appropriate permits. Please provide a map of any currently used or potentially used state highway access for our review associated with the project. If you have any questions please feel free to contact me. Thank you, Brennan Burbank, P.E. Acting Development Review Coordinator | ODOT Region 2 455 Airport Road SE, Bldg. B | Salem, Oregon 97301 (503) 986-2825 | Cell: (503) 798-8195 | Brennan.Burbank@odot.state.or.us

Response to Comment HCLP16 0008

Table 2-5 and Table 2-6 have been revised in the EA to include coordination with Oregon Department of Transportation (ODOT) to obtain necessary permits for any new approaches to state right-of-way, for work within the state highway right-of-way, or for use of oversized or overweight vehicles.

Comment HCLP16 0009 Gamble/Oregon Department of Transportation

ODOT District 5 Permits Department requires applicable District Permits to be obtained prior to working in the right of way (ROW).

Response to Comment HCLP16 0009

Please see Response to Comment HCLP16 0008.

Comment HCLP16 0011 Burleson

Please have your studies look at: COMMENTS

I have owned the 19 acre property (Twp 19S R1east - Sec 19) jointly with C. Lunday for over fifty years. The property is managed as a forest. Your agency has offered to purchase new access road easements. We reject

I need more information about:
The easement request due to concern that upgrades will encourage trespass and result of in removal (additional) trees and vegetation. The BPA easement at this property is only 55 feet with

I have these other comments:
option to remove danger trees. Our strong concern is that is BPA & Company upgrading the line will be indiscriminate in tree and vegetation removal resulting in site degradation.

Response to Comment HCLP16 0011

As described in Section 2.2.11 of the EA, trees identified for removal include only those that would have the potential to fall, grow into, or grow too close to the conductors which can cause a flashover or line outage. Additionally, removal of low growing vegetation associated with structure replacements and access road improvements would be limited to the minimum necessary to safely perform the work and accommodate the equipment used during construction. Vegetation removal is further addressed in Section 3.3.2 of the EA and mitigation measures are identified in Table 2-5 (Section 2.6).

Regarding your comment about encouraging trespass onto your property, BPA proposes installing or repairing gates on existing roads leading into your property. If you have additional site specific questions regarding BPA's proposed actions on your property please contact BPA's local realty specialist at (541) 988-7432.
