

**Supplement Analysis**  
for the  
**Hills Creek-Lookout Point Transmission Line Rebuild Project**  
(DOE/EA-1967/SA-02)

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. A supplement analysis (SA) was completed in June 2022, to address the addition of fire retardant wraps to wood pole structures and the change of materials from wood to steel for 26 structures.

The 2017 EA and 2021 supplemental EA analyzed the effects of installing a 178-foot steel lattice tower (structure 3/3 in the new realignment area). Since that time, BPA has proposed to change the design of this structure to a tubular steel monopole structure similar to structure 3/2. The redesigned structure 3/3 would be about 130-feet tall.

The transmission line corridor has many hard to access structure locations. Based on additional planning that has occurred since the 2017 EA and 2021 supplemental EA, it has been determined that an additional approximately 2,900 feet of access roads are no longer suitable, in their current condition, for construction use, and require minor improvements and the addition of crushed rock to the road surface.

This SA was prepared to determine whether the proposed structure design change and additional road work improvements present substantial changes to the Project or 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 Design Change and Road Work**

Prior to considering the design change, the site preparation for the steel lattice structure at 3/3 was partially completed. However, it was determined that the originally proposed tower leg footing type was not compatible with site conditions, and would require a different footing type that would be difficult to construct given the site's steep slope.

The redesigned structure 3/3 would be a 130-foot tubular steel monopole design. The tubular steel pole segments would be bolted to a 20-foot-deep, 9-foot-diameter pier footing. The structure would also include an attachment system that allows line workers to climb the pole for inspections and maintenance.

The additional access road work would include light surface grading and the placement of additional aggregate on the road surface. The work would take place on two access roads, both of which originate from North Shore Road. The first access road includes approximately 2,050 feet of road that accesses structure 15/3. The second road includes approximately 850 feet of road that accesses structures 17/6 and 17/7.

### **Analysis**

With the design change and additional access road work, the effects of the Hills Creek – Lookout Point Rebuild Project would be essentially the same because a similar structure and access road work were previously analyzed in the 2017 EA and 2021 supplemental EA.

The installation of the proposed new tubular steel monopole structure would require minimal additional site development and the resulting footprint of the steel monopole would be much smaller than the originally proposed steel lattice structure. Because the amount of ground disturbance and the installation methods are similar to the original steel lattice structure, the design change would not introduce additional impacts to sensitive resources, such as wetlands, waterways, wildlife, endangered species or cultural resources, beyond what was discussed in 2017 EA and 2021 supplemental EA. Best management practices and mitigation would still be implemented during construction activities.

The proposed steel monopole structure would appear different than the steel lattice structure as described in the EA. 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, trails and parks with amenities such as picnic tables, boat launches, or restroom facilities, located adjacent to the transmission line.

Structure 3/3 is located in the forested visual environment and would be visible along Laduke Road, south of the city of Oakridge. The tubular steel monopole would be approximately 130 feet tall, which is 48 feet shorter than the original steel lattice structure and the appearance would be consistent with the structure preceding it. Compared to the original steel lattice structure, the tubular steel monopole, structure would not create a dramatic change to the visual environment for travelers along Laduke Road and the visual impacts would continue to be low. Structure 3/3 would be located on US Forest Service (USFS)-managed land in the Willamette National Forest. BPA coordinated with USFS on the proposed changes to the project, and USFS had no concerns regarding visual impacts from the material change to light-duty steel (Robert Mickey, pers. comm., USFS, Acting NEPA Planner, May 8, 2023).

The additional access road improvements would take place on roads on USFS managed and private lands that were previously identified for this project for use in their existing condition with no improvements (i.e., direction of travel). It was later determined that road work, including smoothing,

reshaping, and filling irregularities, would be required to support the necessary construction equipment. Aggregate material would be added to the road surface at a rate no greater than 30 tons per 100 feet of road surface (approximately 4 inches deep). The additional access road improvements would not introduce additional impacts to visual resources, wetlands, waterways, wildlife, endangered species or cultural resources, and would be consistent with the impacts to sensitive resources discussed in the EA.

Overall, the proposed design change and additional access road work would result in similar structure height, amount of ground disturbance, and visual effects. Therefore, these modifications would not substantially deviate from the project and effects analyzed in the 2017 EA or 2021 supplemental EA. Overall, the proposed modifications do not represent a substantial change in the project or significant new circumstances or information relevant to environmental concerns.

### **Findings**

BPA finds that the proposed activities and potential impacts related to the design change and additional access road work are similar to those analyzed in the Hills Creek-Lookout Point Transmission Line Rebuild Final EA (DOE/EA-1967, September 2017), Supplemental EA (DOE/EA-1967, October 2021), and related Findings of No Significant Impact (FONSIs). 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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NEPA Compliance Officer