RECORD OF CATEGORICAL EXCLUSION DETERMINATION

A. Proposed Action: Western plans to replace deteriorated wood poles, cross arms and X-braces at 59 existing H-frame or 3-pole-turning structures (**Table 1**) located along the Coolidge-Oracle 115-kV Transmission Line in Pinal County, Arizona (**Figure 1**). Built in 1943, its aging components are beyond repair and require replacement. These poles performed poorly during structural tests, and we consider them unstable. This project ensures the safety of Western's workers and the public as well as reliability of the bulk electric system.

Western will accomplish the work by clearing vegetation and blading a level pad at the structures, unclipping and laying the conductor on the ground (which can occur several structures away from the pole being replaced). Then we will remove bad poles by lifting or pulling them, auger a 24-inch, nine-foot-deep hole for each pole at or near the previous ones, erect replacement poles, and raise the conductor back into place. Crews cleared the vegetation near these structures during the line's original construction in the 1940s. Western plans to improve existing access roads as needed and acquire right-of-ways for existing roads.

This 45-mile-long transmission line parallels State Routes 287 and 79 between Coolidge, Florence, and Oracle Junction in Pinal County, Arizona. The following land jurisdictions are present: Arizona State Land Department, private, U.S. Bureau of Land Management (Tucson Field Office) and Western. Western's right-of-way measures 100 feet wide and is centered on the transmission line.

Western plans to begin this maintenance project on November 16, 2009 and complete it by February 15, 2010.

B. Categorical Exclusion Applied: 10 CFR, Part 1021, Subpart D, Appendix B, B4.6: "Additions or modifications to electric power transmission facilities that would not affect the environment beyond the previously developed facility area including, but not limited to… replacement of poles,… and crossarms"

C. Regulatory Requirements in 10 CFR 1021.410 (b):

a. The proposed action fits within a class of actions that is listed in Appendix B to Subpart D.

   i. The proposed action was reviewed for the requirements of the Endangered Species Act, the National Environmental Policy Act (NEPA), the National Historic Preservation Act, and all applicable Department of Energy Orders.

ii. The proposed action does not require the siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities.
iii. The proposed action does not disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled and unpermitted releases.
iv. The proposed action was reviewed and surveyed for impacts to cultural and sensitive biological resources. Cultural and sensitive biological resources have been determined to not be affected.

b. There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal; and

c. The proposal is not "connected" to other actions with potentially significant impacts, is not related to other proposed actions with cumulatively significant impacts, and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211.

D. **Determination:** Based on my review of information conveyed to me and in my possession (or attached) concerning the proposed action, as NEPA Compliance Officer (as authorized under DOE Order 451.1A), I have determined that the proposed action fits within the specified class of actions, the other regulatory requirements set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

E. **Special Conditions:**

a. Project-related, ground-disturbing activities at nine structures (0/2, 0/4, 2/3, 2/9, 4/4, 4/5, 5/2, 5/4 & 14/9) will be minimized to the extent possible. For example, poles will be removed using a pole puller, previously used holes will be re-augered and reused, existing equipment pads will be reused, and the smallest practical equipment pad will be built at Structure 4/5.
b. An archaeologist will monitor project-related, ground-disturbing activities at nine structures (0/2, 0/4, 2/3, 2/9, 4/4, 4/5, 5/2, 5/4 & 14/9).
c. Tracked vehicles will avoid the following five areas: between Structures 0/2 and 0/7, at 2/3, at 2/9, between 4/4 and 5/5, and between 14/7 and 15/1.

John R. Holt
NEPA Compliance Officer

11/13/09
Date
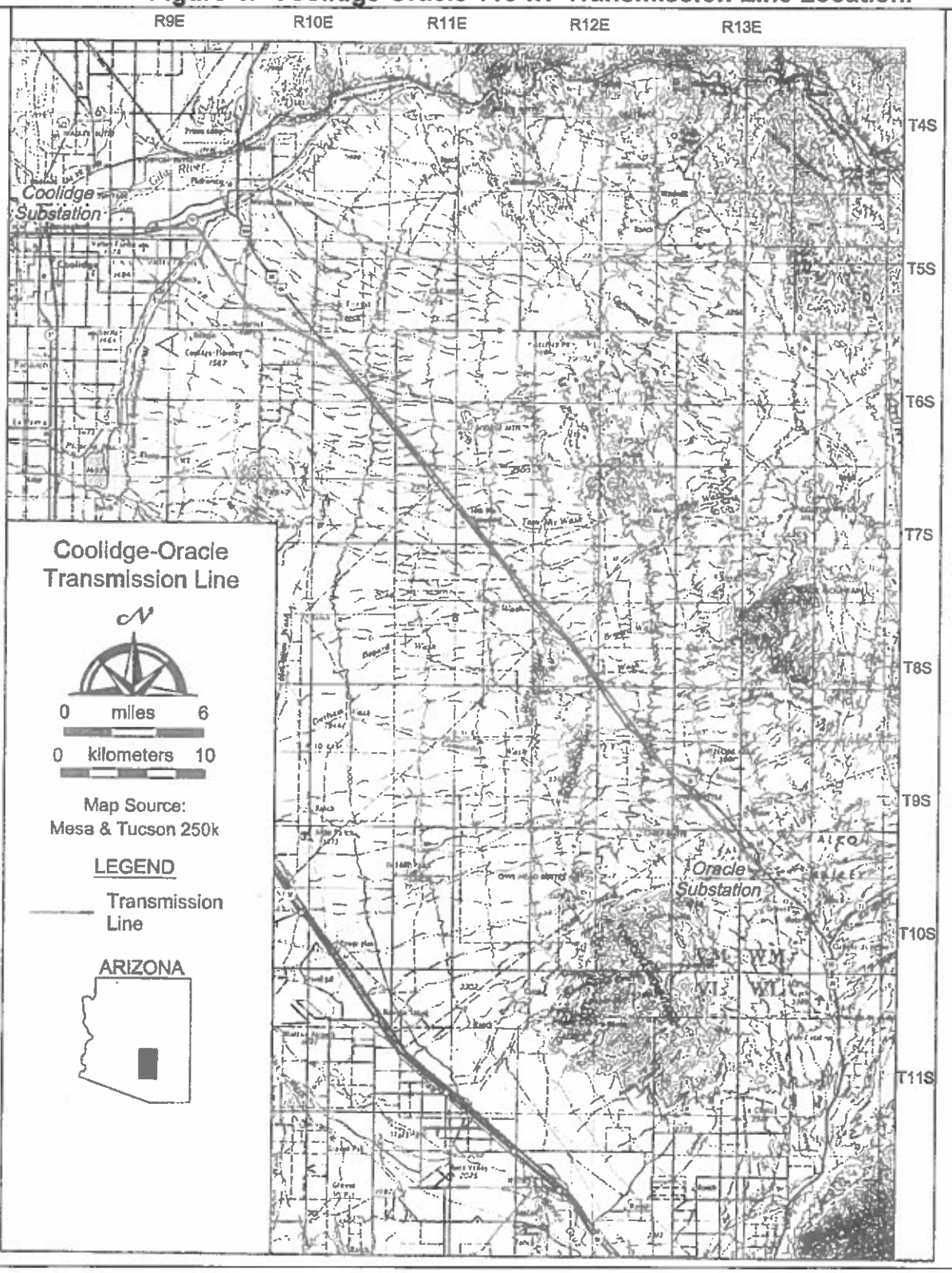
Figure 1. Coolidge Oracle 115-kV Transmission Line Location.