RECORD OF CATEGORICAL EXCLUSION DETERMINATION

A. **Proposed Action:** Western proposes to replace 9.2 miles of 115-kV wood H-frame structures with 230-kV double-circuit steel monopoles and the existing conductor with a single circuit of 1272 kcmil ACSS. The second circuit will not be installed as a part of this project. The rebuild will include new hardware and insulators as well as one optical groundwire (OPGW) for the entire length of the line. Western will use existing access roads to bring personnel and equipment to the work area. The new lines will be designed to accommodate growth in the area by providing additional clearances from encroachments. Work will be conducted within Western's 100-foot right-of-way (ROW). No work will be conducted within the fenced area of the ED5 Substation. Minor work will be conducted within the fence at the ED4 Substation on one existing take-off structure where OPGW will be installed.

The existing wood poles display symptoms of advanced external shell rot, weathering, and large cracks, which may cause the structures to fail and make it unsafe for transmission line personnel to climb the poles to perform maintenance activities. Therefore, this work is necessary to maintain the safety and reliability of the bulk electrical system.

The ED4-ED5 transmission line connects the ED4 Substation, located at the northeast corner of Eleven Mile Corner Road and Milligan Road, and the ED5 Substation, located at the northwest corner of Eleven Mile Corner Road and Curtis Road. The ED4-ED5 transmission line runs north-south between Eleven Mile Corner Road and in-use and fallow agricultural fields. Most of the ROW crosses private land; however, a one-mile segment of the ROW near the ED5 substation crosses State Trust land administered by the Arizona State Land Department (ASLD) (see attached map). The project corridor is located within portions of Sections 7, 18, 19, 30, and 31, T8S, R8E; Sections 6, 7, 18, 19, and 30, T9S, R8E; and Section 25, T9S, R7E; Gila and Salt River Baseline and Meridian (USGS 7.5′ Quadrangles Eloy South, Ariz., 1981, and Friendly Corners, Ariz., 1993).

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 switchyard rock ground upgrades, secondary containment projects, paving projects, seismic upgrading, tower modifications, changing insulators, and replacement of poles, circuit breakers, conductors, transformers, and crossarms."

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

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

a. 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.

b. The proposed action does not require the siting, construction, or major expansion of waste storage, disposal, recovery, or treatment facilities.

c. The proposed action does not disturb hazardous substances, pollutants, contaminates, or CERLA-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled and unpermitted releases.

d. 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.

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

3. 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:

- The construction contractor will obtain a National Pollutant Discharge Elimination System (NPDES) permit from the U.S. Environmental Protection Agency or State as appropriate if the disturbed construction area equals 1 acre or more. Accordingly, the contractor will implement Best Management Practices to ensure that surface and ground water is protected from pollution caused by construction activities and comply with applicable regulations and requirements.

Linda Hughes
NEPA Compliance Officer

9-1-11
Date