RECORD OF CATEGORICAL EXCLUSION DETERMINATION

A. <u>Proposed Action:</u> Western plans to replace deteriorated wood poles, cross arms and X-braces at two existing H-frame structures (11/6 & 11/9) located along the Oracle Tucson 115-kV Transmission Line in Pima, 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 replacement project will ensure 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 blade existing access roads as needed. A new access road on the west side of Structure 11/6 is needed, because the old access road is blocked by residential uses.

This portion of the transmission line is located along the southern portion of Rancho Vistoso Road, in Oro Valley Pima County, Arizona. It occurs within Section 36 in Township 11 South Range 13 East on the Gila and Salt River Baseline and Meridian. Western's right-of-way at Structures 11/6 and 11/9 occurs on private land, measures 100 feet wide, and is centered on the transmission line. The corresponding U.S.G.S. topographic map is Oro Valley, Ariz.

Western plans to begin this maintenance project on May 3, 2010 and complete it by June 30, 2010.

B. <u>Categorical Exclusion Applied:</u> 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. <u>Regulatory Requirements in 10 CFR 1021.410 (b):</u>

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. Avoid driving off paved roads and ground-disturbing activities east and west of the transmission line between Structures 11/1 and 11/4.

John R. Holt

John R. Holt
NEPA Compliance Officer

4/16/10
Date