RECORD OF CATEGORICAL EXCLUSION DETERMINATION

A. **Proposed Action:** Western proposes to conduct pole replacement along the existing Electrical District #2-Saguaro #1 115-kV transmission line. This will consist of removing ninety-five (95) deteriorated wood poles by lifting or pulling them from the ground, auger a 24" hole and installing new wood pole structures and associated hardware. Western will use dozers, backhoes, front end loaders, dump trucks, trailer trucks, water trucks, bucket trucks, crew trucks and pickup trucks to bring crews and equipment to the project area. This work is necessary to maintain the safety and reliability of the bulk electrical system.

The attached maps show the project areas are situated within Sections 30 & 31 Township 6 South Range 8 East, Sections 6, 7, 18, 19, 30 & 31 Township 7 South Range 8 East, Sections 6, 7, 18. 19, 30 & 31 Township 8 South Range 8 East, Sections 6, 7, 18, 19, 30, 31, 32, 33, 34, 35 & 36 Township 9 South Range 8 East, Sections 30, 31, 32 & 33 Township 9 South Range 9 East, Sections 3, 4, 10, 11 & 12 Township 10 South Range 9 East, Sections 7, 15, 16 & 17 Township 10 South Range 10 East on the Gila and Salt River Meridian, Pinal County, Arizona. Work will be conducted within Western's right of way. The corresponding U.S.G.S. 7.5-minute topographic maps are Eloy North, Eloy South, Friendly Corners, Samaniego Hills & Red Rock, Arizona. This work is planned to begin the month of November, 2011.

B. **Categorical Exclusion Applied:** 10 CFR, Part 1021, Subpart D, Appendix B,B1.3: "Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (e.g., pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed. Custodial services are activities to preserve facility appearance, working conditions, and sanitation, such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal. Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Routine maintenance may result in replacement to the extent that replacement is in kind and is not a substantial upgrade or improvement. In kind replacement includes installation of new components to replace outmoded components if the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of a facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:...(m) Repair and maintenance of transmission facilities, including replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed transmission lines, in accordance,

where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions)...."

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. Should archaeological resources or vertebrate fossils be discovered during implementation of the project all surface disturbing activities in the area of discovery shall cease. An archaeologist will evaluate the discovery and provide recommendations to the NEPA Compliance Officer. Surface disturbing activities shall not resume in the area until permission is obtained from the NEPA Compliance Officer.

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:**

1. **An Archaeological monitor will be present during all construction activities. Western will hold an onsite cultural awareness training session so that construction personnel are aware of avoidance areas. The cultural monitor will mark avoidance areas within the transmission line corridor near structures, 13/1, 13/3, 18/4, 39/4, 39/5 & 44/5. The markings will be removed at when ground disturbing activities in the area have been completed.**

2. **A Pre-Construction Biological Inspection of the project area will locate areas to avoid. The qualified biologist will be responsible for overseeing compliance with the avoidance and minimization measures for any desert tortoise, Tucson shovel-nosed snake, or active bird nests located.**

3. **A Qualified Biologist will be present during all project activities that have potential to disturb soil, vegetation, and wildlife in the desert shrubland portions of the alignment. Western will hold an onsite biological awareness training session so that construction personnel are aware of avoidance areas.**

4. **The Biological Monitor will be authorized by Western to temporarily halt construction activity if needed to prevent potential harm to Tucson shovel-nosed snakes, desert tortoise, or nesting birds.**

5. **The work supervisor will coordinate with the Biological Monitor on planned or ongoing activities in desert shrubland habitat and any specific monitoring requirements for each activity in those areas.**

6. **If an active burrowing owl burrow is observed within the project area, the Biological Monitor will designate and flag an appropriate buffer area around the burrow where activities will not be permitted.**

7. **All trash and food items shall be properly contained within vehicles or closed containers. The contents shall be regularly removed from the project area to reduce the attractiveness of the area to ravens and other predators.**

8. **No pets will be permitted on the work site.**

9. **All construction refuse will be removed from the site upon completion of construction. No raw cement/concrete or washings thereof, asphalt, paint, oil, solvents, or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources, shall be disposed**

of on-site or allowed to spill onto soil. Cleanup of any spilled material shall begin immediately.

10. All potential pitfalls to wildlife will be covered or filled when not attended.

Linette King acting for
Linda Hughes
NEPA Compliance Officer

11/22/2011
Date