

DETERMINATION TO PREPARE AN ENVIRONMENTAL ASSESSMENT

Name of Project: Right-of-Way Application for the Tucson-Apache 115-kV Transmission Line

Location: Tohono O'odham Nation, San Xavier District Pima County, Arizona

Description of the Proposed Action:

The proposed federal action consists of Western applying for and providing payment for a ROW across tribal land. In addition, the Bureau of Indian Affairs (BIA) action would consist of granting a 150-foot ROW for the existing transmission line to Western. This would grant Western legal rights to operate and maintain the transmission line and associated access road for a specified period of time, as well as plan for future upgrades to meet anticipated demand on the electrical grid. Under its NEPA procedures, BIA is required to prepare an environmental assessment (EA) for granting ROWs across tribal lands. Western has submitted an application to the BIA to renew the ROW for the existing Tucson-Apache 115-kV transmission line segment crossing tribal land in Tucson, Pima County, Arizona (Figures 1 and 2), and widen it by 50 feet. The line segment crosses Tohono O'odham Nation lands within the San Xavier District in Tucson, Pima County, Arizona. The line segment comprises 2.9 linear miles (about 53 acres) between Los Reales Road and South Nogales Highway in Township 15 South, Range 13 East, Sections 23, 24, 25, and 36 of the Gila and Salt River Baseline and Meridian.

Western previously held a 100-foot ROW (50 feet on either side of centerline) in the Project area, which has expired; the current ROW application is for 150 feet of ROW (50 feet west of centerline, 100 feet east of centerline). The purpose of granting the ROW is to allow legal access to the existing transmission line to ensure safe and reliable operation of the bulk electrical transmission system. The Tucson-Apache transmission line is currently past its engineered life span. Western has approximately 10,000 wood poles in the Desert Southwest Region, with over 50% of those poles more than 50 years old. In addition, Western anticipates that increased demands on the electrical grid will require system upgrades within the next 10 years. The 150-foot ROW will meet these needs by allowing for proposed rebuilds or upgrades to the entire 80-mile Tucson-Apache transmission line, which includes the Project segment. An existing proposal to rebuild the Tucson-Apache line, the Southline Transmission Project, is currently undergoing NEPA analysis and a draft Environmental Impact Statement (DEIS) has been issued. The proposed action would allow for the continued safe and reliable operation of the bulk transmission, and allow Western to meet future electrical demand.

The Tucson-Apache transmission line has been in place for over 60 years. Over this time, the segment within the Project area has undergone regular routine maintenance activities necessary for the safe and reliable operation of the full transmission line. Therefore, the Project area is an existing, active utility corridor. Few alternatives exist for the proposed Project, given that the Tucson-Apache transmission line is an operating high-voltage line, and the segment crossing the Tohono O'odham Nation is integral to the operation of the full transmission line as well as the bulk transmission system.

Potential future upgrades to the transmission line may include those associated with Western's 10-year plan. Under the 10-year plan, upgrades to several of Western's transmission lines are possible, based on anticipated future demands on the bulk electrical system. No specific upgrade designs for the Tucson-Apache line have been proposed to date. Western would complete the appropriate NEPA analyses prior to future upgrade actions.

Southline Transmission, LLC (Southline) has proposed construction of a 345- and 230-kV overhead transmission line from Afton substation in New Mexico to the Saguaro substation in Arizona. The proposed Southline project would include the construction of approximately 240 miles of new double-

circuit 345-kV transmission line, and the upgrade of approximately 120 miles of Western's existing Saguaro-Tucson and Tucson-Apache 115-kV transmission lines, including the Project segment, to a double-circuit 230-kV transmission line. The Bureau of Land Management and Western have initiated an Environmental Impact Statement to analyze the potential impacts of the proposed Southline Transmission Project (BLM and Western 2014). A decision is expected in early 2015. The DEIS and Draft Resource Management Plan Amendment (DRMPA) is available online:

http://www.blm.gov/nm/st/en/prog/more/lands_realty/southline_transmission.html

The DEIS/DRMPA describes in detail the environmental setting and resources potentially affected by the proposed Southline Transmission Project. Those portions of the DEIS/DRMPA describing resources and facilities within the Project area are incorporated here by reference. If the Southline project is implemented, Western would adhere to all project design features and mitigation measures per the final Record of Decision (when complete).

Currently, the Tucson-Apache transmission line ranges from 8 to 12 wood structures per mile, depending on ROW conditions. Future upgrades to a 230-kV transmission line would be built on steel lattice or monopoles. The number of structures per mile would be reduced to about 4 or 5 structures per mile. Temporary disturbance around each new structure during construction would measure about 100 feet by 200 feet (0.5 acre) within the ROW. If the transmission line is upgraded, either the existing access road will be used or a new one will be constructed beneath the new line and the old road will be abandoned. Figure 2.1 provides a comparison of existing and proposed structure types.

Class of Action from Department of Energy (DOE) National Environmental Policy Act (NEPA)

Regulations: Acquiring ROW is normally part of a larger proposal for which Western would do an appropriate NEPA analysis; however, in this case there is no larger Western proposal. Western's proposed action to apply and provide payment for ROW across tribal land falls within category of action A1 Routine DOE Business Actions, in Appendix A to Subpart D of Part 1021, Categorical Exclusions Applicable to General Agency Action. However, because BIA's proposed action requires preparation of an EA, Western will act as co-lead for the EA and prepare its own Finding of No Significant Impact (FONSI) if warranted.

Determination: Based on Section 1021.300 of the DOE NEPA Implementing Procedures, I have determined that an EA will be prepared to assess the impacts of the proposed action. Based on the EA analysis, Western will either prepare a FONSI and proceed with the action, or prepare an EIS if the EA reveals the potential for significant environmental impacts.



Ronald E. Moulton
Senior Vice President and Regional Manager
Desert Southwest Region



Date

Figure 1. Project Overview



Figure 2. Project Area Map

