



Categorical Exclusion Determination

Western Area Power Administration

U.S. Department of Energy



<u>Proposed Action Title:</u>	Casa Grande Fence Relocation
<u>WAPA Region:</u>	Desert Southwest Region (DSW)
<u>Location (County/State):</u>	Pinal County, Arizona
<u>CX Determination Number:</u>	2026-DSW-003
<u>CX Determination Expiration Date*:</u>	4/10/2031

**CX is valid until the date above (no longer than five years from when document was signed) or completion of work started prior to the expiration of the CX Determination, unless there are substantial changes to the scope of work, location, or applicable regulations. If such changes occur prior to the expiration of the CX, the Region Environmental Program will review the analysis to ensure the CX is still applicable.*

Proposed Action Description:

WAPA is proposing a one-time relocation of the Casa Grande substation perimeter fence located on the west side of the facility and the removal of the razor wire along that same portion of fence. The project footprint includes 94,080 square feet at the crossroads of N. Thornton Rd and W. Main Ave in Pinal County of Casa Grande, AZ. All ground disturbance will take place inside the WAPA substation that is privately owned, but WAPA-controlled. The fence needs to be moved a minimum of 6 feet to allow IVM's contractor adequate access to maneuver between WAPA's and Waste Management's fences with their side-by-side, which has spray equipment mounted in the bed. WAPA-Realty will be processing a license agreement for the Waste Management facility due to the encroachment of their perimeter fence.

WAPA craft employees flagged the issue as a public safety and WAPA security issue. The Waste Management fence being close to the substation ground grid could result in a ground potential rise (GPR) transferred during a fault. This is a "step and touch potential hazard" that violates NESC and OSHA policies. WAPA crews are also currently unable to get between the two property fences to maintain the vegetation and blowing debris. DSW is planning to have this project completed between 4/20/2026 and 9/30/2026 by a contractor. The new construction of the WAPA fence will take place in the existing disturbed area of the substation. Equipment may include bulldozers, backhoes, an excavator, concrete trucks, bucket trucks, cranes, jacks, rigging and support structures, and other types of grounding, welding, bolting, and torquing equipment for the installation of the new fence.

Environmental Requirements during Project Implementation:

- If the scope of work of this project changes, DSW's Environment Department must be contacted to determine whether additional environmental review is required.
- If planned activities occur between February 15 and August 31, nesting bird surveys will be conducted prior to project activities by DSW Environmental or an approved environmental contractor. If a nest is detected, an appropriate buffer will be marked by DSW Environmental. Nesting surveys can be conducted up to 2 weeks prior to project activities and will be coordinated with DSW Environmental.



- Any injured or orphaned birds and all observed active nests must be immediately reported to DSW Environmental. Any dead birds must be reported to DSW Environmental within twenty-four (24) hours of discovery. Additional documentation, such as photographs and GPS coordinates, may be requested to support DSW's reporting requirements to the U.S. Fish and Wildlife Service.
- If an inactive or active eagle nest is discovered, DSW Environmental must be notified immediately for further instruction. Work must be avoided within 330 feet of Bald and Golden Eagle nests when inactive and 660 feet when active.
- If any cultural resources are inadvertently discovered during implementation of the proposed action, work within 100 feet of the discovery area must halt immediately, and a DSW Archaeologist must be contacted immediately. Work around the discovery must not resume until notification to proceed is provided by a DSW Archaeologist.
- If any possible human remains are inadvertently discovered during implementation of the proposed action, work within 100 feet of the discovery area must halt immediately, and a DSW Archaeologist must be notified immediately (no later than 24 hours from the time of discovery). A reasonable effort must be made to protect the remains from looting and/or further damage. Work around the discovery must not resume until notification to proceed is provided by a DSW Archaeologist.
- Activities involving the use of oil and other hazardous materials (fuel, hydraulic fluid, or other petroleum products) must comply with DSW's Spill Response Plan (SRP).
- WAPA will comply with the existing Pinal County Dust Control Permit (DUSTW-26-0159).
- To prevent the transport of non-native and invasive plants and animals, including noxious weeds, work crews must thoroughly wash all vehicles and equipment (trailers, trucks, UTVs, etc.) before entering the work site to ensure they are free of soil, seeds, vegetation matter, or other debris.

Categorical Exclusion(s) Applied (Number and Title):

B1.11 Fencing

B2.5 Facility safety and environmental improvements

B4.6 Additions and modifications to transmission facilities

B4.11 Electric power substations and interconnection facilities

Findings:

For the DOE procedures regarding categorical exclusions, including the full text of each categorical exclusion, see 10 CFR 1021.102 and Appendix B to [10 CFR Part 1021](#), and also Section 5.4 (Applying one or more categorical exclusions to a proposal) and Appendices B and C of [DOE's National Environmental Policy Act Implementing Procedures](#) (Jun. 30, 2025).



Requirements and guidance in 10 CFR 1021.102 and DOE's NEPA Implementing Procedures: (See full text in regulation and in Implementing Procedures)



The proposal fits within a class of actions that is listed in Appendix B to 10 CFR Part 1021 or Appendix B or C of DOE's NEPA Implementing Procedures (June 30, 2025).

To fit within the classes of actions listed in Appendix B to 10 CFR Part 1021, or Appendix B of DOE's NEPA Implementing Procedures, a proposal must satisfy the conditions that are integral elements of the classes of actions in Appendix B of both 10 CFR Part 1021 and DOE's NEPA Implementing Procedures. Additionally, for CXs adopted pursuant to NEPA Section 109 (see DNIP, Appendix C), the originating Federal agency's integral elements or extraordinary circumstances must be in accordance with the applicable requirements.



There are no extraordinary circumstances related to the proposal that may affect the significance of the environmental effects of the proposal. DOE or an applicant may modify the proposal to avoid reasonably foreseeable adverse significant effects such that the categorical exclusion would apply.



The proposal has not been segmented to meet the definition of a categorical exclusion.

[Note: For proposals that fit within the categorical exclusions listed in Appendix C of DOE's NEPA Implementing Procedures, see DOE's notice of adoption for the subject Appendix C categorical exclusion for additional considerations. DOE notices of adoption for other agency categorical exclusions may be found on [DOE's Section 109 webpage](#).]

Determination:

Based on my review of the proposed action, I have determined that the proposed action fits within the specified class(es) of action, the other requirements and guidance set forth above are met, and the proposed action is hereby categorically excluded from further NEPA review.

WAPA Authorized Official Signature:

Scott R. Lund
Senior Vice President and
Desert Southwest Regional Manager