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April 26, 2019

Nogales Ranger District
Attn: Jim Copeland, District Ranger
303 Old Tucson Road
Nogales, AZ 85621

Re: Cienega Creek FireScape Project

Dear Mr. Copeland,

On behalf of Tucson Electric Power (TEP), thank you for the opportunity to comment on the Cienega Creek FireScape Project and Environmental Assessment. TEP has reviewed the alternatives proposed by the United States Forest Service (USFS) including the proposed action relative to the location of TEP's facilities including the Fort Huachuca 46 kV Transmission Line and Greaterville Substation. TEP has no objections to the actions proposed by USFS.

TEP's facilities support or provide electric service to the greater Tucson metropolitan area, and are part of the western electric utility grid. TEP is committed to providing safe and reliable electric service to our customers and is always looking to minimize threats to our facilities posed by fire or smoke hazards.

TEP supports the proposed project because firebreaks and vegetation thinning will provide protection for our facilities, however TEP is also concerned with the proximity of our facilities to prescribed burns and vegetation treatment activities. TEP requests that special consideration be taken during the planning and conducting of these activities in order to reduce special hazards and thereby greatly reduce the risk of injury and damage. These special hazards include:

Special Hazards:

Smoke Buildup - Smoke consists of carbon particles, which can conduct electricity. If the concentration of carbon is high enough, an electrical discharge from the line to the ground, similar to lightning, can occur. The discharge hazard increases as line voltage increases, distance to the ground decreases, and the amount of smoke increases. Such discharges have killed fire fighters.

To reduce the potential for discharges, the fire front should not be allowed to cross under the lines. By properly coordinating the location of the burn with the wind direction or by lighting the fire parallel to the line, no major smoke buildup should occur.

Water and Power Lines - When working below power lines with water hoses, extreme care must be taken to keep water streams out of overhead lines. Water will conduct electricity and the water stream will act as a conductor.

Downed Power Lines - Power lines can be downed during a prescribed burn by vehicles colliding with poles or poles being burned. If power lines are downed, there are two hazards: the lines themselves and the combination of lines on wire fences. When lines are downed they become hard to see and people or vehicles can run into them. Electrocution or serious shock injury can occur. Also, wildfires can be started by the downed lines arcing. If lines fall on fences, a new hazard is created. Electricity will be conducted by the fence wires for long distances. The distance will be determined by the type of posts (steel posts may reduce the hazard) and the contact between wires at corner and pull posts. As long as the wires contact each other, there is the potential for shock.

Direct contact with Power Lines – During mechanical treatment, vehicles, equipment, and/or personnel can come in direct contact with power lines causing electrocution.

Targeted Vegetation Removal - Vegetation treatments and grassland maintenance activities that are adjacent to TEP transmission lines shall be conducted in a way that discourages growth into the line.

Requested Notification:

Special consideration during planning and implementation of the proposed activities can eliminate or greatly reduce injury and damage, as well as outages that would impact TEP's customers. Please coordinate all prescribed fire activities in proximity to power lines and communication sites with Stephen Kaplan, T&D Superintendent at office 520-918-8397 (office), phone 520-241-0953 (mobile), and/or skaplan@tep.com (email). TEP requests that Steve Kaplan be notified of any proposed prescribed burns at least two weeks prior to the burn, so that TEP can determine whether monitors are to be present.

Please call me with any additional questions or concerns. I can be reached at (520) 884-3981 or via email at dsandoval1@tep.com.

Respectfully,

Diana Sandoval
Environmental & Land Use Planner
Tucson Electric Power Company
a UNS Energy Corporation