**Proposed Action:** T-Mobile Telecommunications Upgrade at Snohomish Substation

**Project Manager:** Jonathan Toobian – TELP-TPP-3

**Location:** Snohomish County, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.19 Microwave, meteorological and radio towers

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow T-Mobile to upgrade its existing telecommunications facility located at the BPA-owned Snohomish Substation in Snohomish, Washington. Work on an existing steel-lattice communications structure would include removing three existing panel antennas and installing three new panel antennas and six new remote radio units. Two combined overvoltage protection devices would be relocated to the communications structure from the utility H-frame structure on the ground.

In addition to upgrading structure-mounted equipment, work would occur in T-Mobile’s fenced equipment area underneath the communications structure. Work on the ground would include removing two existing equipment cabinets and installing one new cabinet with new communications equipment. Communications equipment located in the removed cabinets would either be relocated to the new cabinet or removed from the site.

The project would not involve any ground excavation or grading and would use established access roads and work areas. No vegetation removal is proposed.

**Findings:** In accordance with Section 1021.410(b) of the Department of Energy’s (DOE) National Environmental Policy Act (NEPA) Regulations (57 FR 15144, Apr. 24, 1992, as amended at 61 FR 36221-36243, Jul. 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011), BPA has determined that the proposed action:

1. fits within a class of actions listed in Appendix B of 10 CFR 1021, Subpart D (see attached Environmental Checklist);
2. does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal; and
3. has not been segmented to meet the definition of a categorical exclusion.

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.

/s/ W. Walker Stinnette  
W. Walker Stinnette  
Contract Environmental Protection Specialist  
Salient CRGT
Reviewed by:

/s/ Carol P. Leiter
Carol P. Leiter
Supervisory Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel Date: January 6, 2020
Sarah T. Biegel
NEPA Compliance Officer

Attachment(s): Environmental Checklist
Categorical Exclusion Environmental Checklist

This checklist documents environmental considerations for the proposed project and explains why the project would not have the potential to cause significant impacts on environmentally sensitive resources and would meet other integral elements of the applied categorical exclusion.

Proposed Action: T-Mobile Telecommunications Upgrade at Snohomish Substation

Project Site Description

The project site is an existing T-Mobile telecommunications facility on BPA fee-owned property located immediately north of the maintenance headquarters building at the Snohomish Substation in Snohomish, Snohomish County, Washington (Section 12, Township 28 N, Range 5 East). Access to the site is via approximately 300 feet of graveled access roads that originate near the paved substation entrance.

The T-Mobile facility consists of an approximately 175-foot-tall steel lattice communications structure and a fenced equipment area on the ground underneath the structure. All existing and proposed structure-mounted equipment is at a height of approximately 150 feet above ground level. In the fenced equipment area, a utility H-frame structure and equipment cabins are mounted on a concrete pad. The project site is disturbed and of low ecological quality. Ground cover within the facility consists of gravel and little to no vegetation. Patches of bunchy native and non-native grasses are located within portions of the graveled access roads. According to the United States Department of Agriculture, Natural Resources Conservation Service, soils in the project site are classified as "Urban Land", which suggests that they are primarily non-native fill material. BPA and the United States Fish and Wildlife Service have mapped freshwater forested/shrub wetlands approximately 700 feet north and approximately 500 feet southwest of the project site. The closest surface water body is located approximately 950 feet northwest of the project site.

Evaluation of Potential Impacts to Environmental Resources

<table>
<thead>
<tr>
<th>Environmental Resource Impacts</th>
<th>No Potential for Significance</th>
<th>No Potential for Significance, with Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>✔</td>
<td>☐</td>
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</tbody>
</table>

**Explanation:** As no soil excavation would occur as a result of this undertaking, and minor additive features do not adversely impact the integrity of historic transmission infrastructure, BPA has determined that this undertaking has No Potential to Effect historic properties.

| 2. Geology and Soils | ✔ | ☐ |

**Explanation:** Minor soil compaction from vehicle and equipment use could occur within the project site. However, geology and soils within and around the project site were previously disturbed during construction of the substation, communications facility, and access roads, and the site is located on non-native fill material.

| 3. Plants (including Federal/state special-status species and habitats) | ✔ | ☐ |

**Explanation:** Project-related activities (e.g. vehicle and equipment use) could cause removal of vegetative cover in small areas where vegetation is present. No additional tree or vegetation removal is proposed. There are no documented occurrences of any state special-status plant species or plant species protected under the Federal Endangered Species Act (ESA) near the project site. The project site does not contain habitat suitable for protected plant species. Therefore, the proposed project would have no effect on protected plant species.
4. **Wildlife** (including Federal/state special-status species and habitats)  
   ![ ] ![ ]  
   **Explanation:** There are five documented bald eagle (*Haliaeetus leucocephalus*) occurrences within 5 miles of the project site, and the closest is approximately 1.3 miles west of the project site. Minor and temporary disruption of normal wildlife behavior could occur from elevated noise and human presence during project implementation. However, current ambient noise and disturbances are high in the area due to operations and maintenance activities at the substation, so many wildlife species that may be present in the area would likely be habituated to high levels of disturbance. There are no documented occurrences of any other state special-status wildlife species or wildlife species protected under the Federal ESA, and no such species or suitable habitat are expected to occur at the project site. Therefore, the proposed project would have no effect on protected wildlife species.

If any active nests are found on the steel-lattice communications structure, the project would be delayed until the nests are unoccupied.

5. **Water Bodies, Floodplains, and Fish**  
   (including Federal/state special-status species, ESUs, and habitats)  
   ![ ] ![ ]  
   **Explanation:** The project site is not in or near any waterbodies or floodplains, and there are no documented occurrences of any state special-status or ESA-listed fish or fish habitat near the project site. Therefore, the proposed project would have no impact on these resources.

6. **Wetlands**  
   ![ ] ![ ]  
   **Explanation:** No wetlands are present within the project site. The project would use established access roads and work areas, and no ground excavation is proposed. Therefore, the proposed project would have no impact on wetlands.

7. **Groundwater and Aquifers**  
   ![ ] ![ ]  
   **Explanation:** The project would not involve any ground excavation. Therefore, the proposed project would have no impact on groundwater and aquifers.

8. **Land Use and Specially-Designated Areas**  
   ![ ] ![ ]  
   **Explanation:** There would be no change in land use at the project site. No specially-designated areas are in the project vicinity.

9. **Visual Quality**  
   ![ ] ![ ]  
   **Explanation:** There would be no change in visual quality at the project site. The final configuration of structure-mounted and ground level equipment would be consistent with the existing use of the site as a telecommunications facility.

10. **Air Quality**  
    ![ ] ![ ]  
    **Explanation:** Temporary and minor dust and vehicle emissions would increase in the local area from use of vehicles and equipment during project implementation. There would be no long-term changes in air quality following completion of the project.

11. **Noise**  
    ![ ] ![ ]  
    **Explanation:** Project-related noise would be minor and temporary and would occur during daylight hours. Operational noise would not change from current ambient conditions.

12. **Human Health and Safety**  
    ![ ] ![ ]  
    **Explanation:** The project would not generate or use hazardous materials and would not create conditions that would increase risk to human health and safety. No impacts to human health and safety are expected as a result of project activities.
**Evaluation of Other Integral Elements**

The proposed project would also meet conditions that are integral elements of the categorical exclusion. The project would not:

- Threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders.
  
  **Explanation, if necessary:**

- Require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators) that are not otherwise categorically excluded.
  
  **Explanation, if necessary:**

- Disturb hazardous substances, pollutants, contaminants, or CERCLA excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases.
  
  **Explanation, if necessary:**

- Involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those of the Department of Agriculture, the Environmental Protection Agency, and the National Institutes of Health.
  
  **Explanation, if necessary:**

**Landowner Notification, Involvement, or Coordination**

**Description:** The project site is on BPA fee-owned property, and BPA would notify adjacent easement lessees of the upcoming project. There would be no effect to adjacent landowners.

Based on the foregoing, this proposed project does not have the potential to cause significant impacts to any environmentally sensitive resource.

Signed: /s/ W. Walker Stinnette  
Date: January 6, 2020  
W. Walker Stinnette  
Contract Environmental Protection Specialist  
Salient CRGT