Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

**Proposed Action:** AT&T South Renton LTE Antenna Upgrade

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

**Location:** King 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 AT&T to upgrade an existing telecommunications facility located on a BPA-owned transmission tower (structure 8/6 on the Covington-Duwamish No. 1 transmission line) in Renton, King County, Washington. The work would consist of removing three existing panel antennas and installing six new panel antennas. In addition, six existing remote radio units (RRUs) would be removed and replaced in-kind with new RRUs. One surge protector and six diplexers would also be installed. To ensure safety, BPA workers and their subcontractors would complete the tower installation work. The project would not involve any ground excavation.

**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
Portland State University – Hatfield Resident Fellow

Reviewed by:

/s/ Douglas F. Corkran
Douglas F. Corkran
Supervisory Environmental Protection Specialist
Concur:

/s/ Sarah T. Biegel                       Date:  April 23, 2019
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.

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**Project Site Description**

The project site consists of an existing AT&T telecommunications facility in Renton, King County, Washington. The AT&T facility is collocated with a 100-foot BPA transmission tower (structure 8/6 on the Covington-Duwamish No. 1 transmission line) in Section 28, Township 23 North, Range 5 East. Underneath the transmission tower is a fenced enclosure with AT&T equipment mounted on a concrete pad. The project site is immediately surrounded by mixed native and non-native herbaceous vegetation that is maintained through regular mowing as a transmission line right-of-way. Within the maintained right-of-way, a baseball field is located southeast of the project site, and the intersection of SE 168th Street and 116th Avenue SE is located to the northwest. Land use outside of the right-of-way is primarily commercial and residential development.

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**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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<tr>
<td><strong>Explanation:</strong> The project would use established access roads and work areas, and does not include ground excavation. All work would occur on the structure itself, and such minor additive features would not adversely impact the integrity of historic resources. The BPA historian reviewed the proposed activities and determined that this undertaking has <strong>No Potential to Effect</strong> historic properties. No further review under the National Historic Preservation Act is required.</td>
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| 2. Geology and Soils | ✓ |                                               |
| **Explanation:** Geology and soils with and around the project site were likely previously disturbed during the installation of the transmission tower and the telecommunications facility. Although the proposed project does not involve excavation or grading of soils, minor soil compaction may occur due to vehicles driving around the project site. |

| 3. Plants (including Federal/state special-status species and habitats) | ✓ |                                               |
| **Explanation:** Project-related activities (e.g., vehicle and equipment use) may result in removal of vegetative cover in small areas. There are no documented occurrences of any state special-status plant species or plant species protected under the Federal Endangered Species Act (ESA). Therefore, the proposed project would have no effect on protected plant species. To prevent the spread of noxious weeds, the construction vehicles would be required to be cleaned before entering a new project site. |
4. **Wildlife** (including Federal/state special-status species and habitats)

   **Explanation:** Minor disruption of normal wildlife behavior in and around the project site could occur from temporary elevated noise and human presence. Though the level of activity and noise (metallic impact sounds from tower work) may rise above typical maintenance levels at the site, it would be brief (not greater than a few days). There are no documented occurrences of any state special-status wildlife species or wildlife species projected under the Federal ESA. Therefore, the proposed project would have no effect on protected wildlife species.

   If any active nests are found on the tower prior to construction, the construction 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 mapped waterbodies or floodplains, and there are no special-status fish species. Therefore, the proposed project would have no impact on these resources.

6. **Wetlands**

   **Explanation:** The project site is not in or near any mapped wetlands. The project would use established access roads and work areas, and does not include ground excavation. Therefore, the proposed project would have no impact on wetlands.

7. **Groundwater and Aquifers**

   **Explanation:** The project would not involve any ground excavation. Therefore, there would be no impact to groundwater and aquifers.

8. **Land Use and Specially-Designated Areas**

   **Explanation:** There would be no change to land use at the project location. No specially-designated areas are in the project vicinity.

9. **Visual Quality**

   **Explanation:** There would be no change to visual quality at the project location. The wireless antennas and equipment would be consistent with the existing use of the site as a telecommunications facility for AT&T.

10. **Air Quality**

    **Explanation:** Minor dust and vehicle emissions would occur during construction. However, there would be no significant changes to air quality during or after construction.

11. **Noise**

    **Explanation:** Construction noise would be temporary and would occur during daylight hours. Operational noise would not change.

12. **Human Health and Safety**

    **Explanation:** No impacts to human health or safety are expected as a result of project activities.

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**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.
**Landowner Notification, Involvement, or Coordination**

**Description:** The transmission tower is owned by BPA. AT&T is responsible for acquiring and maintaining easements for their facilities from underlying 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  
W. Walker Stinnette – EC-4  
Contract Environmental Protection Specialist  
Portland State University – Hatfield Resident Fellow  

**Date:** April 23, 2019