Categorical Exclusion Determination
Bonneville Power Administration
Department of Energy

Proposed Action: Wireless Communication Upgrades at Five Sites in Washington

Project Manager: Jonathan Toobian – TELP-TPP-3

Location: Clark, King, and Whatcom Counties, 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 and T-Mobile to upgrade their existing telecommunication facilities collocated with BPA transmission towers at five sites in Clark, King, and Whatcom Counties, Washington. The work would vary among sites and would generally consist of removing and/or installing tower-mounted telecommunication equipment, including panel antennas, tower-mounted amplifiers (TMAs), remote radio units (RRUs), combined overvoltage protection (COVP), coaxial cables, diplexers, and filters. In some cases, the amount and/or configuration of equipment on the transmission towers would change. To ensure safety, BPA workers and their subcontractors would complete the tower installation work. In addition to upgrading tower-mounted equipment, removal and/or installation of ground-level telecommunication equipment could occur in compounds underneath or adjacent to associated transmission towers. The project would not involve any ground excavation.

The upgrades would occur at the following locations:

AT&T Blaine 2: Tower 9/3 on the Custer-Ingledow No. 1 transmission line in Whatcom County, WA (Section 32, Township 41 North, Range 1 East)

AT&T Tanner East: Tower 99/4 on the Rocky Reach-Maple Valley No. 1 transmission line in King County, WA (Section 35, Township 23 North, Range 9 East)

T-Mobile Burton Ridge: Tower 32/1 on the North Bonneville-Ross No. 1 transmission line in Clark County, WA (Section 28, Township 2 North, Range 2 East)

T-Mobile Ross Plaza: Tower 6/2 on the Tacoma-Raver No. 1 transmission line in King County, WA (Section 17, Township 21 North, Range 4 East)

T-Mobile SeaTac Mall: Tower 7/2 on the Tacoma-Raver No. 1 transmission line in King County, WA (Section 9, Township 21 North, Range 4 East)

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, July 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  
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**

Telecommunication equipment upgrades would occur on existing BPA-owned transmission structures located within existing transmission line rights-of-way. Three of the sites are located on privately-owned land, one is on land owned by the Washington Department of Natural Resources, and one is on BPA fee-owned land. The sites have existing access roads to the tower bases, and all of the sites have had prior ground disturbance.

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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>
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<tbody>
<tr>
<td>1. Historic and Cultural Resources</td>
<td>✔️</td>
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<tr>
<td><strong>Explanation:</strong> BPA historian review has shown that no soil excavation would occur as a result of this undertaking and minor additive features do not adversely impact the integrity of historic transmission lines. Therefore, BPA has determined that this undertaking has <strong>No Potential to Effect</strong> historic properties.</td>
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<td>2. Geology and Soils</td>
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<td><strong>Explanation:</strong> Geology and soils within and around the project sites have been previously disturbed during the installation of the transmission towers and the telecommunication facilities. Although the proposed project would not involve excavation or grading of soils, minor soil compaction may occur due to vehicles driving on the access roads and around the project sites.</td>
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<td>3. Plants (including federal/state special-status species)</td>
<td>✔️</td>
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<td><strong>Explanation:</strong> 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.</td>
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4. **Wildlife** (including federal/state special-status species and habitats)

| Explanation: | Northern spotted owls have been documented within 0.5 miles of the AT&T Tanner East site in March 1987 and January 1992, and marbled murrelet designated critical habitat is located approximately 1.0 miles to the south. However, the proximity of the site to Interstate 90 (approximately 200 feet to the south), likely makes the project area unsuitable habitat for northern spotted owl and marbled murrelet. No special-status wildlife species or habitats are present at the other four project sites. 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 two days). If any active nests are found on the tower prior to construction, the construction would be delayed until the nests are unoccupied. Therefore, the project is not expected to impact state special-status or ESA-listed wildlife. |

5. **Water Bodies, Floodplains, and Fish** (including federal/state special-status species and ESUs)

| Explanation: | The South Fork of the Snoqualmie River is located approximately 0.10 miles from the AT&T Tanner East site; though there is a wide riparian buffer and no protected fish species are documented. There are no waterbodies, floodplains, or listed fish species in or near the other four project sites. Vehicles would use existing access roads and work areas, and no soil excavation would occur. Therefore, the project would not impact waterbodies, floodplains, and fish. |

6. **Wetlands**

| Explanation: | Three of the project sites (AT&T Blaine 2, T-Mobile Burton Ridge, and T-Mobile Ross Plaza) are not located in or near mapped wetlands. Riverine wetlands associated with South Fork Snoqualmie River are mapped less than 0.10 miles north of the AT&T Tanner East site, and wetlands are mapped less than 0.10 miles west of the T-Mobile SeaTac Mall site. The project does not involve any soil excavation, and the sites would be accessed via existing roads. Therefore, the project would have no impact on nearby wetlands. |

7. **Groundwater and Aquifers**

| Explanation: | The project does not involve any soil 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 locations. No specially designated areas are in the project vicinities. |

9. **Visual Quality**

| Explanation: | There would be no change to visual quality at the project locations. The wireless antennas and equipment are consistent with the existing use of the sites as telecommunication facilities for AT&T and T-Mobile. |

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. |
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 transmission towers are owned by BPA. The project proponents are 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  Date: April 15, 2019
W. Walker Stinnette – EC-4
Contract Environmental Protection Specialist
Portland State University – Hatfield Resident Fellow