

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** AT&T Telecommunication Equipment Upgrades at Redland South Wireless Site

**Project No.:** W1044

**Project Manager:** Brian Keith, TELP-TPP-3

**Location:** Clackamas County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.19 Microwave, meteorological and radio towers. B1.3 Routine maintenance, B4.6 Additions and modifications to transmission facilities.

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow AT&T to upgrade its telecommunications equipment at its Redland South wireless site, located on structure 78/4 of BPA's Big Eddy-Chemawa No. 1 Transmission Line in Clackamas County, Oregon (Township 3 South, Range 2 East, Section 12). Telecommunications equipment would be installed on an existing transmission structure and within the enclosed equipment compound. On the existing transmission structure, BPA would remove on AT&T's behalf the existing antennas and tower mounted amplifiers (TMA). BPA would install six new antennas, 12 tower mounted amplifier transmitters (TMAT), hybrid and fiber cable, and other associated telecommunication equipment. The proposed groundwork would be within the existing AT&T fenced enclosure, located at the base of the BPA structure, and would include removing and replacing components such as equipment cabinets, breakers, battery packs and other associated equipment. The existing frames inside the compound would be used. No groundwork or soil disturbances are proposed with this project.

Sites would be accessed using existing access roads and routes of travel. The upgrades would not include any access road improvements or modifications. Any activities that involve hazardous materials such as lead-acid batteries containing mercury or other hazardous materials would be disposed of at a designated hazardous waste facility.

BPA leases space on its transmission towers for wireless antenna facilities pursuant to its authority under sections 2(e) and 2(f) of the Bonneville Project Act. 16 U.S.C. § 832a(e)-(f).

**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; 89 FR 34074, April 30, 2024), 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. <sup>1</sup>

Justin Olmsted  
Environmental Protection Specialist

Concur:

Katey C. Grange  
NEPA Compliance Officer

Attachment(s): Environmental Checklist

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<sup>1</sup> BPA is aware of the November 12, 2024, decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality regulations implementing NEPA are not judicially enforceable or binding on this agency action, BPA has nonetheless elected to follow those regulations at 40 Code Federal Regulations (C.F.R.) §§ 1500– 1508, in addition to the US Department of Energy’s NEPA implementing procedures at 10 C.F.R. Part § 1021, to meet the agency’s obligations under NEPA, 42 U.S.C. §§ 4321 *et seq.*

# 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:** AT&T Telecommunication Equipment Upgrades at Redland South Wireless Site

## **Project Site Description**

AT&T's Redland South wireless site is located on BPA structure 78/4 of Big Eddy-Chemawa No. 1 Transmission Line in Clackamas County, Oregon. The tower is located on private land with an existing easement for BPA's transmission line right-of-way (ROW). AT&T's equipment enclosure is within the BPA structure base, which can be accessed using an existing road. The local area is rural and comprised mostly of private properties with various land management practices. The portion on ROW on which the BPA transmission structure and enclosure are located is fenced and used to hold domesticated livestock. As a result, this enclosed area is highly grazed with compacted soil which consists of low growing grasses with minimal to no shrub vegetation. Various generations of trees border the project area which are fragmented by individual private land management practices. BPA web-based resources indicate that the majority of these trees are not dispersal forest for Northern Spotted Owl (NSO), and no biotic detections have been noted within a 10-mile radius of the proposed work area.

## **Evaluation of Potential Impacts to Environmental Resources**

### **1. Historic and Cultural Resources**

Potential for Significance: No

Explanation: BPA Cultural Resources staff has determined that the proposed project meets Stipulation I.A.1 of *Programmatic Agreement Among the Bonneville Power Administration, the Oregon State Historic Preservation Office, the Washington State Historic Preservation Office, the Idaho State Historic Preservation Office, the Montana State Historic Preservation Office, and the Advisory Council on Historic Preservation to Address Effects to BPA Transmission Lines* (December 19, 2024). No further Section 106 consultation is required.

### **2. Geology and Soils**

Potential for Significance: No

Explanation: Minor soil compaction may occur due to increased vehicle traffic during the proposed construction; however, this would be minimal and would not result in significant effects to soil or geology. No soil disturbance would be associated with this project.

### **3. Plants (including Federal/state special-status species and habitats)**

Potential for Significance: No

Explanation: The proposed actions would occur in existing structures with limited existing vegetation as a result of grazing and trampling by domesticated livestock. Little impact to plants, including Federal or state listed species and their habitat would be expected as a result of the proposed actions.

#### **4. Wildlife (including Federal/state special-status species and habitats)**

Potential for Significance: No

Explanation: The wireless location is located within a private fenced area used for domesticated livestock holding. No wildlife habitat removal, including the removal of active bird nests, would take place as part of the proposed activities. Some minor noise and visual disturbance could occur during work, but these disturbances would be temporary and return to pre-existing conditions following equipment upgrades. Little impact to wildlife and no effect to ESA-listed or sensitive wildlife species are expected.

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

Potential for Significance: No

Explanation: All work would take place on existing BPA transmission structure and within the existing site boundary. No in-water work would take place. No sediment or hazardous material releases are expected from the proposed actions. No impacts to water bodies, floodplains, or fish are expected.

#### **6. Wetlands**

Potential for Significance: No

Explanation: The project site is not located within a wetland nor is there any work associated with wetlands. Therefore, no impacts to wetlands are expected.

#### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: All work would take place at the existing BPA transmission structure and within the existing site boundary. No sediment or hazardous material releases are expected from the proposed actions. No impacts to groundwater or aquifers are expected.

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

Potential for Significance: No

Explanation: All work would take place at the existing BPA transmission structure with existing wireless network equipment already in place. No changes in land use are proposed. No impacts to land use or specially-designated areas are expected.

#### **9. Visual Quality**

Potential for Significance: No

Explanation: All work would take place at the existing BPA transmission structure with existing wireless network equipment already in place. Some minor changes in the visual appearance of antennas, wiring, or equipment may occur, but these would be consistent with the existing uses of the site and would generally not be overtly noticeable from nearby viewing areas. No substantial impacts to visual quality are expected.

## 10. Air Quality

Potential for Significance: No

Explanation: Small amounts of fugitive dust and vehicle emissions may occur during site work; however, these would be temporary and minor. No substantial impacts to air quality are expected.

## 11. Noise

Potential for Significance: No

Explanation: Some minor noise associated with construction equipment and vehicles may occur but would be temporary and during daylight hours. No substantial impacts from noise are expected.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: No releases of hazardous materials are expected. Wireless carriers are required to use equipment that meets Federal Communications Commission (FCC) standards for radio wave emissions. Any hazardous materials, such as lead-acid batteries, removed from the site would be disposed of at a designated hazardous waste facility. No impacts to human health and safety are expected.

### **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: N/A

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

Explanation: N/A

**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: N/A

**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: N/A

**Landowner Notification, Involvement, or Coordination**

Description: AT&T would be required to coordinate with the appropriate landowner and BPA to gain access to property and the BPA transmission structure. AT&T should also coordinate an appropriate time to complete telecommunication upgrades with the landowner to ensure domestic livestock would not be impacted by construction activities.

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

Signed:

Justin Olmsted  
Environmental Protection Specialist