

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** T-Mobile Wireless Upgrades on Sammamish-Maple Valley #1 Transmission Line

**Project No.:** W1031

**Project Manager:** Brian Keith

**Location:** King County, WA

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.19 Microwave, meteorological, and radio towers; B4.9 Multiple use of powerline rights-of-way; B1.31 Installation or relocation of machinery and equipment

**Description of the Proposed Action:** Bonneville Power Administration (BPA) is proposing to allow T-Mobile Wireless access to structure 22/1 along the Sammamish-Maple Valley #1 transmission line in King County, WA. Tower work would include the removal and replacement of existing antennas and mounts and the installation of hybrid cables and associated equipment. Groundwork below the structure would include the removal and replacement of one equipment cabinet, installation of a new ice bridge, and installation of fiber and power cables between the equipment in an approximately 30-foot-long by 2-foot-wide by 40-inch-deep trench. All groundwork would occur within the existing, fenced telecommunication facility and within previously disturbed soils. Work equipment for the following project would mostly include, but not be limited to, light duty trucks, a bucket truck, hand tools, and power hand tools.

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), 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

---

<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:** T-Mobile Wireless Upgrades on Sammamish-Maple Valley #1 Transmission Line

## **Project Site Description**

Structure 22/1 of BPA's Sammamish-Maple Valley No. 1 Transmission line is located on BPA fee-owned right-of-way in King County, Washington. The site has previous ground disturbance and is located in an area with graveled, mulched, paved, or compacted soils. The tower location is surrounded by residential parcels and is located about 0.25 miles east of the Issaquah Creek Natural Area.

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

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

Potential for Significance: No

Explanation: The proposed work does not include any construction activities that would affect cultural or historic resources. BPA Historian and cultural review has stated that the proposed project would have no potential to cause effect to historic and cultural properties.

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

Potential for Significance: No

Explanation: Ground disturbance would occur at the existing tower site; however, the area of ground-disturbing activities would take place in and around previous ground disturbance, and within T-Mobile's existing antenna and equipment areas. These disturbed areas include graveled, mulched, paved, and/or compacted soils. There would be no ground disturbing activities outside the fenced compound under the tower. The tower site would be returned to pre-project conditions from all disturbed soil surrounding the proposed construction area.

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

Potential for Significance: No

Explanation: The project location is unvegetated; therefore, there would be no impacts to vegetation, including Federal or state special-status species and/or habitats.

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

Potential for Significance: No

Explanation: There are no Federal or state special-status species or habitats at any of the sites that would be impacted by the project. If any active nests are found on the tower prior to the project activities, the work would be delayed until the nest is unoccupied. Work sites are located within well-established areas outside critical habitat. Temporary disturbance to non-sensitive wildlife may occur during work periods, but it is anticipated that wildlife would distribute to adjacent habitats and that noise disturbance would be consistent with ongoing operations of the sites.

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

Potential for Significance: No

Explanation: No water bodies, floodplains, or fish disturbance occur at the existing site.

**6. Wetlands**

Potential for Significance: No

Explanation: The proposed action would not disturb or affect any wetlands as there are no wetlands within the project area.

**7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Ground disturbance would occur at the existing communication site; however, the construction area would take place in and around previous ground disturbance. These areas include graveled, paved, and/or compacted soils. No disturbance to groundwater and aquifers would take place.

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

Potential for Significance: No

Explanation: There would be no change to land use at any of the locations. The site is not in a specially designated area.

**9. Visual Quality**

Potential for Significance: No

Explanation: The presence of the proposed equipment would have minimal impacts, and the visual quality would be similar to pre-project conditions.

**10. Air Quality**

Potential for Significance: No

Explanation: A small amount of dust and vehicle emissions would occur during construction; however, there would be no significant changes to air quality during or after construction.

**11. Noise**

Potential for Significance: No

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

**12. Human Health and Safety**

Potential for Significance: No

Explanation: The proposed work would improve work areas and structural integrity of structures that support network operations and would maintain reliable power for associated equipment.

### **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: T-Mobile would be responsible for all communications and coordination to adjacent landowners outside of BPA's ROW. All construction work would be conducted on BPA fee-owned property.

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