

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Telecommunications Equipment Upgrades at Existing Wireless Sites in Washington

**Project No.:** W1037; W1039; W1051

**Project Manager:** Brian Keith

**Location:** Multiple locations in Washington

**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 T-Mobile to upgrade their wireless network antennas and equipment at four existing sites on BPA transmission structures in Washington. The work would consist of removing, relocating, and/or replacing existing antennas attached to BPA transmission structures. Additional equipment such as remote radio units (RRUs), over voltage protection devices (OVPs), tower mounted amplifiers (TMAs), and other associated antenna mounting equipment would be added or removed. Coaxial cables may be replaced or added through existing or new conduit installed on the ground or on the tower structure. Groundwork may include the replacement or addition of equipment cabinets, associated hardware, installing service lights, and other items located within T-Mobile's equipment compound. Trenching would be required at each location to install conduit; however, this would occur within the fenced perimeter of T-Mobile's equipment compounds.

The upgrades would occur at the following locations:

- **T-Mobile's Prairie-Cabe:** Located on structure 33/5 on Murray-Custer No. 1 in Skagit County, Washington (Township 36 North, Range 5 East, Section 18). The site is located on private property with an active BPA easement. A trench, measuring 20-feet long by 2-feet wide by 3-feet deep would be dug to bury 20 feet of conduit within the existing, fenced facility where previous ground disturbances have occurred.
- **T-Mobile's Beaver Lake:** Located on structure 16/2 on Sammamish-Maple Valley No.1 Transmission Line in King County, Washington (Township 24 North, Range 6 East, Section 2). The site is located on private property with an active BPA easement. A trench, measuring 75-feet long by 2-feet wide by 3-feet deep would be dug to bury 75 feet of conduit within the existing, fenced facility where previous ground disturbances have occurred.

- **T-Mobile's Custer Substation:** Located on structure 13/4 on Bellingham-Custer No. 1 Transmission Line in Whatcom County, Washington (Township 39 North, Range 1 East, Section 1). The site is located on BPA Fee-Owned right-of-way (ROW). A trench, measuring 30-feet long by 2-feet wide by 40-inches deep would be dug to bury 30 feet of conduit within the existing, fenced facility where previous ground disturbances have occurred.

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), 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 that the Council on Environmental Quality (CEQ), on February 25, 2025, issued an interim final rule to remove its NEPA implementing regulations at 40 C.F.R. Parts 1500–1508. Based on CEQ guidance, and to promote completion of its NEPA review in a timely manner and without delay, in this CX/SA/EA BPA is voluntarily relying on the CEQ regulations, in addition to DOE's own regulations implementing NEPA at 10 C.F.R. Part 1021, to meet its 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 Telecommunications Equipment Upgrades at Existing Wireless Sites in Washington

## **Project Site Description**

Antenna equipment replacements would occur on existing transmission structures located within existing transmission line ROW. The structures are located in urban and rural residential areas in Washington. Structure 16/2 of the Sammamish-Maple Valley No.1 Transmission Line is about 65-feet from a private residence. The sites have existing access roads to the tower bases with existing enclosures and all sites have had prior ground disturbance. There are no wetlands or surface waters located within project working areas.

## **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 projects meet the requirements of the *Program Comment for Communications Projects on Federal Lands and Property* (March 13, 2024). No further Section 106 consultation is required.

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

Potential for Significance: No

Explanation: Minor soil compaction may result from increased traffic to each project site; however, vehicles would stay on existing access roads and immediate borders of the existing transmission facilities and wireless compounds. Trenches would be dug within each company's existing compounds or within the perimeter of the BPA transmission structure. All locations are previously disturbed. Following conduit installation, all trenches would be backfilled with existing soil and topped with gravel. Best management practices (BMPs) would be implemented for erosion and dust control. No impact to geology would be expected from the proposed projects.

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

Potential for Significance: No

Explanation: Small amounts of vegetation may be crushed or removed as a result of these projects; however, vegetation that would be impacted would be located on access roads or within the boundaries of the transmission structures which may need to be removed to keep facilities clear for access. There would be limited impacts to plants and no effect to ESA-listed or sensitive plant species would occur.

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

Potential for Significance: No

Explanation: 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 at select locations, but these disturbances would be temporary and return to pre-existing conditions following equipment upgrades. If any active nests are found on the structures prior to construction, the construction would be delayed until the nests are unoccupied. Limited impacts 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 at existing facilities and within existing site boundaries. No in-water work would take place. No sediment or hazardous material releases are expected from the proposed actions, and BMPs would be utilized for erosion control measures. No impacts to water bodies, floodplains, or fish are expected.

#### **6. Wetlands**

Potential for Significance: No

Explanation: All work would take place at existing facilities and within existing site boundaries. No work in wetlands would take place. No sediment or hazardous materials releases are expected from the proposed actions. No impacts to wetlands are expected.

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

Potential for Significance: No

Explanation: All work would take place at existing transmission facilities with existing wireless network equipment already in place. BMPs for trench work and equipment use would minimize risks to groundwater and aquifers. 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 existing transmission facilities with existing wireless network equipment already in place. There would be no impact to land uses and there are no specially-designated areas at any of the project locations.

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

Potential for Significance: No

Explanation: All work would take place at existing transmission structures 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 sites and would generally not be overtly noticeable from nearby viewing areas.

## 10. Air Quality

Potential for Significance: No

Explanation: Small amounts of dust and vehicle emissions would occur during trenching and transport to project sites; however, these would be temporary and minor. No permanent impacts to air quality would occur as a result of the proposed actions.

## 11. Noise

Potential for Significance: No

Explanation: Temporary increases in noise levels above ambience would result, but noise would return to normal levels following each project's completion. The proposed projects would be completed during daylight hours.

Notes:

- Due to the close proximity of household on structure 16/2 of the Sammamish-Maple Valley No.1 Transmission Line, T-Mobile should coordinate with the landowner to identify an appropriate time and date to complete trenching operations.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: No release of hazardous materials is 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 sites 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: T-Mobile would be required to notify appropriate landowners prior to any work and coordinate any access requirements as needed.

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