

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** AT&T Wireless Upgrades at Port Angeles Substation

**Project No.:** W1045

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

**Location:** Clallam County, Washington.

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.7 Electronic Equipment.

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow AT&T to upgrade their wireless equipment at an existing telecommunications tower located within BPA's Port Angeles Substation in Clallam County, Washington. The proposed actions would not include any trenching, and all work would occur on previously disturbed ground within the fenced BPA Substation boundary. The site would be accessed using existing routes of travel.

Work on the existing telecommunications tower would include:

- Removing three antennas
- Removing nine remote radio units (RRUs)
- Installing six antennas
- Installing nine RRUs
- Replacing associated mounting equipment and associated cables

Work within the enclosed equipment compound would include:

- Removing four equipment cabinets
- Installing three equipment cabinets
- Replacing various wireless hardware equipment

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>

Jessica A. Heppler  
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 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:** AT&T Wireless Upgrades at Port Angeles Substation

## **Project Site Description**

The project site is located at BPA's Port Angeles Substation in Port Angeles, Clallam County, Washington (T30N R6W Section 14). Project activities would be carried out within the boundaries of the substation property. Surface cover within the project site consists of concrete and gravel with some maintained ornamental vegetation. The area outside the substation may be characterized as primarily residential, with some light industrial, school facilities and associated open spaces, and utility-owned vacant property. The National Hydrography Dataset indicates the nearest body of water is a creek approximately one mile to the east of the substation, and soil data from the Natural Resources Conservation Service indicates the project site is composed of non-hydric soils.

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

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

Potential for Significance: No

Explanation: The proposed project actions would have no ground disturbance, the structure is 45 years old, and there are no proposed changes in tower heights. The project would meet the requirements for the *Program Comment for Communications Projects on Federal Lands and Property* (March 13, 2024). Pursuant to Stipulation VI.B. "Collocation of communications antennae," no further Section 106 review and consultation is required.

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

Potential for Significance: No

Explanation: Project activities are not expected to impact soils or geology due to lack of ground-disturbing activities.

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

Potential for Significance: No

Explanation: No ground disturbance is anticipated. There are no documented occurrences of any special-status plant species, or plant species protected under the federal Endangered Species Act (ESA) occurring at the project site. Therefore, the proposed project would not impact protected plant species.

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

Potential for Significance: No

Explanation: There are no documented occurrences of special-status wildlife species or suitable habitat present in the project area. Minor and temporary disturbance of common wildlife species could occur from elevated noise during construction. Because the work would be

occurring with a fenced and currently operating substation yard, any wildlife present are likely used to human presence and noise.

Therefore, the proposed project may have a temporary impact on general wildlife species during construction activities, but the proposed action would not have a permanent impact or an effect on special-status wildlife species or habitats.

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

Potential for Significance: No

Explanation: The project site is not located near any surface waters or fish bearing streams and is not located within a floodplain.

## **6. Wetlands**

Potential for Significance: No

Explanation: The project action area is not within or near a wetland.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Project actions would not disturb soil or include any other activities that could impact aquifers and groundwater.

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

Potential for Significance: No

Explanation: There would be no change in land use or specially designated areas as a result of this project.

## **9. Visual Quality**

Potential for Significance: No

Explanation: Replacing and upgrading the antennas on the existing communications tower is expected to be a minor alteration to visual quality and would remain consistent with the overall visual characteristics of the site.

## **10. Air Quality**

Potential for Significance: No

Explanation: Depending on the vehicles and equipment used, temporary and minor dust and vehicle emissions could increase in the local area during project implementation. There would be no long-term impact to air quality following completion of the project.

## **11. Noise**

Potential for Significance: No

Explanation: Temporary construction noise would occur during daylight hours. No ongoing noise increase is expected for this area as a result of this project.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The project would not generate or use hazardous materials and would not create conditions that would increase risk to human health and safety. No impact to human health and safety is 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: 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: The project site is on BPA fee-owned property. There are no other landowners that would need to be notified or involved.

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

Signed:

Jessica A. Heppler  
Environmental Protection Specialist