

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** AT&T Telecommunications Upgrades at I-5 & 320<sup>th</sup> Site

**Project No.:** W-0661

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

**Location:** King County, 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 to upgrade an existing wireless telecommunications site located on tower 7/2 of the Tacoma - Covington No. 3 transmission line. The structure is located on private property with an existing easement. Telecommunications equipment would be removed and installed on the existing tower.

On the existing structure, work would include:

- Remove nine panel antennas and six tower mounted amplifiers.
- Add six antennas, six remote radio units, twelve tower mounted amplifiers, 450 feet of cable and other associated equipment.

BPA leases space on its transmission structures 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).

Additional groundwork would be required for the new communications site, including installing new racks, batteries, and other related groundwork. These additional activities would occur on private property not on the BPA-owned structure. The additional work would not be constructed, authorized, or funded by BPA and would be addressed in the Federal Communications Commission's licensing process and associated environmental compliance.

**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>

Kane Barrett Finders  
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 Telecommunications Upgrades at I-5 & 320<sup>th</sup> Site

## **Project Site Description**

Structure 7/2 of BPA's Tacoma - Covington No. 3 transmission line is on privately owned property on the transmission right of way (ROW) in Federal Way, King County, Washington (Township 21, Range 4, Section 9). The ground cover at the work site consists of concrete, gravel, and bare earth. Surrounding the project site are commercial buildings and heavily used arterial roads. A Freshwater Emergent Wetland is located 550 feet east of the project site. Continuing east is Interstate Five.

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

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

Potential for Significance: No

Explanation: Proposed project actions meet the requirements for the *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). Pursuant to Stipulation I.A.1 no further Section 106 review or consultation is required.

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

Potential for Significance: No

Explanation: Minor soil compaction may occur due to increased vehicle traffic accessing the site 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: No ground disturbance is anticipated. Access to the site is provided by a paved road and a gravel parking lot that would not result in vegetation disturbance. 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 special-status wildlife species or suitable habitat for special-status wildlife species present in the project area. Minor noise and visual disturbance could occur during equipment installation, but these disturbances would be temporary, transitory, and likely similar to background levels of noise and visual disturbance. Therefore, the proposed action would not have an effect on special-status wildlife species or habitats. If an active nest is found on the structure prior to equipment installation, the work would be delayed until the nest is unoccupied.

## **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 the existing tower. No in-water work would take place, and no sediment or hazardous material releases are expected from the proposed action. No impacts to water bodies, floodplains, or fish are expected.

## **6. Wetlands**

Potential for Significance: No

Explanation: The project site is not located in any mapped wetlands, and the soils mapped within the project site are not typically associated with wetlands. A wetland is located approximately 550 feet east of the project; however, there is no work or access proposed in that area. Vehicle access to the site would stay on paved and gravel roads. Standard construction best management practices would prevent indirect impacts to this off-site wetland. Therefore, the proposed action would not impact wetlands.

## **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 release is 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 and the project site is not located within any specially-designated areas.

## **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. Overall, the proposed actions would have minimal impact on visual quality.

## 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 release of hazardous material 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 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: The project site is on property with an existing easement. AT&T would be required to coordinate with BPA and all applicable landowners as required.

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

Signed:

Kane Barrett Finders  
Environmental Protection Specialist