

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: T-Mobile Antenna Upgrades on BPA Structures

Project Manager: Jonathan Toobian—TELP-TPP-3

Location: Skagit and Whatcom Counties, 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 T-Mobile to upgrade their wireless facilities on BPA's transmission towers. T-Mobile refers to these sites as Kelly Ridge and Prairie Cabe. Both sites are on BPA's Murry-Custer No. 1 transmission line.

The work would consist of:

Kelly Ridge Site: Removal of six 63-inch-long by 12-inch-wide antennas and replacement with three 72-inch-long by 25-inch-wide antennas. Three 22-inch-long by 12-inch-wide remote radio units (RRU) would also be installed on the same tower mounts as the antennas.

Prairie Cabe Site: Removal of four 72-inch-long by 12-inch-wide antennas, and four 48-inch-long by 8-inch-wide antennas. Those antennas would be replaced with two 72-inch-long by 25-inch-wide antennas and two 22-inch-long by 12-inch-wide remote radio units (RRU). The coaxial cable that connects the antennas to the equipment on the ground would also be removed and replaced.

The antennas and associated equipment at both sites would be removed from the tower using a bucket or line truck. The antennas would be lowered to the ground with a rope and pulley system. The work is expected to be completed at each site within five days or less. Two to three crew trucks would be onsite while the work is occurring. A flatbed truck or box trailer would be used to haul tools and equipment to and from the site. The project would not involve any ground excavation. To ensure safety, BPA workers and their subcontractors would complete the wireless antenna and coaxial cable installation work on the tower.

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.

/s/ Beth Belanger

Beth Belanger
Contract Environmental Protection Specialist
Flux Resources, LLC

Reviewed by:

/s/ Carol Leiter

Carol Leiter
Supervisory Environmental Protection Specialist

Concur:

/s/ Sarah T. Biegel

Sarah T. Biegel
NEPA Compliance Officer

Date: March 31, 2020

Attachment: Environmental Checklist

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.

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Project Site Description

Kelly Ridge Site: The project location is on tower 54/4 of the Murray-Custer No. 1 transmission line, three miles north of Bellingham, Washington. The site is in Township 39 North, Range 3 East, Section 31. The project location and surrounding area are relatively flat. Highway 539 runs north-south and is 0.75 miles west of the project area. The site is used as a cattle pasture. Neighboring parcels consist of rural residential homes and agricultural fields.

The site is in the Whatcom Creek-Frontal Bellingham Bay Watershed. There are no major waterbodies in, or near, the project location. A review of the National Wetland Inventory, topography, and aerial photos did not reveal any wetlands or waterbodies at the site. The vegetation at the project site consists of mostly reed canary grass (*Phalaris arundinacea*).

Prairie Cane Site: The project location is on tower 33/5 of the Murray-Custer No. 1 transmission line in Sedro Woolley, Washington. The site is in Township 36 North, Range 5 East, Section 18. The topography at the site is relatively flat with a slight incline to the east; it is located on a bench above the Samish River valley, with steep slopes farther to the east. Highway 9 runs north-south and is 0.65 miles west of the project location. Neighboring parcels are comprised of mostly rural residential parcels.

The site is in the Samish River watershed. Two streams are located approximately 350-feet northeast and 550-feet southwest of the project location. There is no hydrological connectivity from the project site to these streams. A review of the National Wetland Inventory, topography, and aerial photos did not reveal any wetlands or waterbodies at the site. The vegetation at the project site consists of mostly reed canary grass, Western buttercup (*Ranunculus repens*), and bracken fern (*Pteridium aquilinum*).

Evaluation of Potential Impacts to Environmental Resources

Environmental Resource Impacts	No Potential for Significance	No Potential for Significance, with Conditions
1. Historic and Cultural Resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> As no ground disturbance would occur as a result of this undertaking, and minor additive features do not adversely impact the integrity of historic transmission infrastructure, BPA has determined that this undertaking has No Potential to Effect historic properties.		
2. Geology and Soils	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> The proposed projects do not involve ground disturbance. Some insignificant compaction of soils may occur due to bucket and/or line trucks driving around the sites.		
3. Plants (including Federal/state special-status species and habitats)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>Explanation:</u> Some vegetation would be crushed during antenna replacement activities but no Federal/state special-status plants would be impacted. To prevent the spread of noxious weeds, the construction vehicles would be required to be cleaned before entering a new project location.		

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

Explanation: There are no known occurrences of Federal/state special-status species or habitats at either project location. However, there have been occurrences of Oregon spotted frog in other locations, along the Murry-Custer No. 1 transmission line.

To ensure that the projects have no effect to Oregon spotted frog, the following timing restrictions and best management practices (BMPs) would be employed at both project locations:

- Work would occur during the dry season (from July 1 to September 30).
- Work would not occur during or immediately after a major precipitation event (>0.5 inch).
- Workers and equipment would not enter areas of standing water; including driving over roadways that have been flooded.
- Vehicles and equipment would be restricted to staying on the access road and tower landing; where there is no clearly established access road or tower landing, it would be required to limit the movement of vehicles and equipment and stay as close to the tower as safely possible.
- Vehicles and equipment would be cleaned prior to entering each project location to reduce the potential to spread or to introduce noxious weeds.
- Vegetation within the equipment compound would be mechanically removed. Herbicide treatments in the equipment compounds are contractually prohibited.
- If in-water work must occur, disinfection procedures would be utilized for control of chytrid fungus (*Batrachochytrium dendrobatidis*), ranavirus, and other potentially unknown disease or parasites.

Construction activities may temporarily displace non-listed wildlife but there would be no long-term impacts to wildlife.

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

Explanation: The project areas do not have any water bodies, floodplains, or listed fish species; therefore, there would be no impacts to these resources.

6. **Wetlands**

Explanation: The projects are not in or near wetlands; therefore, there would be no impact to wetlands.

7. **Groundwater and Aquifers**

Explanation: The project does not involve any ground disturbance; therefore, there would be no impact to groundwater and aquifers.

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

Explanation: There would be no change to land use at the project locations and there are no specially-designated areas at either site.

9. **Visual Quality**

Explanation: The wireless antennas and equipment are consistent with the existing use of the utility corridor and radio tower facilities.

10. **Air Quality**

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**



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

12. **Human Health and Safety**



Explanation: There would be no impact to human health and safety.

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, if necessary:

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

Explanation, if necessary:

- 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, if necessary:

- 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, if necessary:

Landowner Notification, Involvement, or Coordination

Description: The project proponent is responsible for acquiring and maintaining easements for their facilities from underlying landowners.

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

Signed: /s/ Beth Belanger

Date: March 31, 2020

Beth Belanger, ECT-4
Contract Environmental Protection Specialist
Flux Resources, LLC