

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** T-Mobile Equipment Upgrade at Salem Substation

**Project No.:** W0969

**Project Manager:** Jonathan Toobian, TEPF-CSB-2

**Location:** Polk County, Oregon

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.19 Microwave, meteorological and radio towers.

**Description of the Proposed Action:** The Bonneville Power Administration (BPA) proposes to allow T-Mobile to upgrade the existing wireless antennas on a tower owned by BPA and leased by T-Mobile, located adjacent to the Salem Substation in Polk County, Oregon. The proposed project activities include removing, replacing, and installing new antennas, hybrid cable, and other associated equipment. Replacement equipment and antennas would be of similar dimensions. Project activities would occur within a fenced area containing existing communications equipment (buried cables, above ground cabinets, buried vaults, etc.). There would be no below-ground disturbance from project activities. Surface disturbance from the staging and use of equipment would be limited to an approximate 220 square foot area consisting of previously imported engineered fill material. Access to the site would be via the existing access road network.

**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/ Jillian Cosgrove

Jillian Cosgrove  
Environmental Protection Specialist

Concur:

/s/ Katey C. Grange 11/8/2023

Katey C. Grange      Date  
NEPA Compliance Officer

Attachment(s): 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.

## Proposed Action: T-Mobile Equipment Upgrade at Salem Substation

### Project Site Description

The project site is located at T-Mobile's Winona Radio Station, adjacent to BPA's Salem Substation, Township 7 South, Range 3 West, and Section 29. The site is surrounded by privately-owned agricultural land and is bordered to the south by Oregon Highway 22. The project site, including access roads, is located within the Croisan Creek-Willamette River HUC 6 watershed. The nearest water body is the Willamette River, located south of Highway 22 and approximately 400 feet south of project site.

### Evaluation of Potential Impacts to Environmental Resources

#### 1. Historic and Cultural Resources

Potential for Significance: No

Explanation: BPA issued a no potential to cause effect memo on July 7, 2023 which found that the proposed project would not have the potential to cause effects on historic properties, assuming such historic properties were present.

#### 2. Geology and Soils

Potential for Significance: No

Explanation: There would be minimal surface disturbance resulting from the staging and use of equipment. There would be no below-ground disturbance. All activities would occur on existing gravel surfaces that are frequently used for maintenance activities. These actions would not cause significant impacts to soils or geology.

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

Potential for Significance: No

Explanation: A BPA site assessment in 2016 found no presence nor suitable habitat for Endangered Species Act (ESA) listed or state protected plant species in the vicinity of Salem Substation. The project area is within the range of Willamette daisy (*Erigeron decumbens*, endangered), Golden paintbrush (*Castilleja levisecta*, threatened), Kincaid's lupine (*Lupinus sulphureus* spp. *kincaidii*, threatened), Bradshaw's desert parsley (*Lomatium bradshawii*, endangered), Nelson's checker-mallow (*Sidalcea nelsoniana*, threatened), and Water howellia (*Howellia aquatilis*, threatened). However, suitable habitat for these species does not exist within the project area. Furthermore, there is no designated critical habitat for federally listed plants in the vicinity of the Salem Substation. All project activities would occur on existing gravel surfaces and paved access roads that are frequently used for maintenance activities. Therefore, the project would not cause significant impacts to plants.

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

Potential for Significance: No with conditions

Explanation: A BPA site assessment in 2016 found no presence nor suitable habitat for ESA listed wildlife species in the vicinity of Salem Substation. Furthermore, there is no designated critical habitat for ESA listed wildlife that would be affected by the project. There is an osprey nest immediately to the east of the substation yard. There is also an eagle nest 0.66 miles to the east of the substation. The project would not affect the nesting osprey or eagle because seasonal timing restrictions would be implemented to avoid disturbing the nesting osprey and eagles during the breeding season (see Conditions below).

Notes:

- The breeding season for osprey is April 1 – August 31, and the breeding season for bald eagles is January 1 – August 31. If project activities are scheduled within these breeding season windows, a biological monitor approved by the U.S. Fish and Wildlife Service must be present during construction to ensure that project activities do not affect nesting behavior.
- If project activities occur during the breeding season, the U.S. Fish and Wildlife Service may have additional requirements, including permitting. They should be contacted at:  
Pacific Region Migratory Birds and Habitat Program  
(503) 231-6164  
Eastside Federal Complex  
911 11th Avenue  
Portland, OR, 97232-4181

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

Potential for Significance: No

Explanation: The project area does not contain any water bodies, floodplains, or surface connectivity to fish streams. There would be no impacts to these resources due to the lack of surface connectivity from the work areas to waterbodies and the implementation of erosion control BMPs. There is designated critical habitat for the ESA listed Upper Willamette River Chinook Salmon and the Upper Willamette River Steelhead ESUs in the Willamette River, located approximately 400 feet south of the project site. The project would not affect Upper Willamette River Steelhead, Upper Willamette River Chinook Salmon, nor their critical habitats because there are no tributaries on or near the substation property that drain to the Willamette River and the project does not entail any ground disturbing work that would cause erosion of soils or sedimentation of waterways draining to the Willamette.

#### **6. Wetlands**

Potential for Significance: No

Explanation: The Willamette River, located approximately 400 feet south of the project site, is the only wetland in proximity to the project area. There would be no impacts to the Willamette River due to lack of surface connectivity from the work area to the Willamette River and the implementation of erosion control BMPs.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: Spill prevention measures would be utilized during construction activities. There would be no below-ground disturbance from project activities. Therefore, the project would not provide a pathway for groundwater contamination.

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

Potential for Significance: No

Explanation: Project actions would be located within the BPA transmission right-of-way. Land use would remain the same.

## **9. Visual Quality**

Potential for Significance: No

Explanation: Project actions would replace existing equipment with similar size and dimensions. Visual quality would be similar to existing conditions and would not change the overall visual quality of the location.

## **10. Air Quality**

Potential for Significance: No

Explanation: There may be a small amount of temporary dust and vehicle emissions during construction; however, there would be no substantial changes to air quality after construction is completed.

## **11. Noise**

Potential for Significance: No

Explanation: Construction noise would occur during intermittent periods of time during daylight hours. After project completion, the operational noise at the substation would not change. The project would not substantially change the noise quality of the area beyond temporary construction-related noise impacts.

## **12. Human Health and Safety**

Potential for Significance: No

Explanation: During project activities, all standard safety protocols would be followed. Therefore, project activities would not impact human health or 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: 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 proposed project would occur on BPA fee-owned land. No landowner notification or coordination would be needed for the proposed actions. BPA's real property services group would be the primary point of contact concerning any adjacent landowner concerns.

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

Signed: /s/ Jillian Cosgrove  
Jillian Cosgrove  
Environmental Protection Specialist

11/8/2023  
Date