

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** T-Mobile Wireless Upgrades at Multiple Washington Locations

**Project Manager:** Chuck Wedick – TELP-TTP-3

**Location:** King, Mason, Pierce, and Clallam Counties, Washington

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B4.9 Multiple use of powerline rights-of-way; B1.19 Microwave, meteorological and radio towers

**Description of the Proposed Action:** Bonneville Power Administration (BPA) proposes to allow T-Mobile to make upgrades to antennas and associated equipment at multiple wireless sites located at BPA facilities. Work would occur on structures and in equipment yards under or adjacent to the structures which house existing wireless communication equipment. Specifically, work would occur at the following locations:

**Twin Lakes:** Project actions would occur on and below structure 3/4 of the Tacoma-Covington Nos. 3 & 4 line.

**Panther Lake:** Project actions would occur on and below structure 5/2 of the Tacoma-Covington Nos. 3 & 4 line.

**Windsor:** Project actions would occur on and below structure 15/4 of the Sammish-Maple Valley No. 1 line.

**Shelton Substation:** Project actions would occur on a structure near the control house and in the equipment yard of the Shelton Substation.

**PCC Port Angeles Substation:** Project actions would occur on a structure and in the equipment yard near the control house of the Port Angeles Substation.

**Highway 512:** Project actions would occur on and in the equipment yard near structure 5/6 of the Cowlitz Tap Chehalis – Covington No. 1 line.

Project actions would include removing, replacing, or installing new antennas, remote radio units, coaxial cable, diplexers, cabinets, ice bridges, and other associated equipment. Work at Shelton Substation, Panther Lake, and Twin Lakes would include ground disturbance within the existing and previously-disturbed equipment yards from the installation of new H-frames and unistruts, which are structures anchored in the ground to support other equipment. With the exception of the H-frame or unistrut installation, no ground disturbance would be required. Equipment used would likely include pickup trucks, a bucket truck, and hand tools.

**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/ Kali Levy

Kali Levy  
Contract Environmental Protection Specialist  
Portland State University

Reviewed by:

/s/ Carol Leiter

Carol Leiter  
Supervisory Environmental Protection Specialist

Concur:

<u>/s/ Katey C. Grange</u>	<u>October 12, 2021</u>
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 Wireless Upgrades at Multiple Washington Locations

## **Project Site Description**

Project sites are located on BPA fee-owned or easement rights-of-ways and substations. The surrounding areas are residential and business uses of varying densities.

**Twin Lakes:** The project site is structure 3/4 of the Tacoma-Covington Nos. 3 & 4 line located in King County, Washington (Township 21 North, Range 4 East, and Section 19). An unimproved BPA access road runs approximately 30 feet north of the structure.

**Panther Lake:** The project site is structure 5/2 of the Tacoma-Covington Nos. 3 & 4 line in King County, Washington (Township 21 North, Range 4 East, and Section 17). There are trees and shrubs planted around the fence of the equipment yard underneath the tower. An unimproved BPA road provides access to the structure.

**Windsor:** The project site is structure 15/4 Sammamish-Maple Valley No. 1 in King County, Washington (Township 24 North, Range 6 East, and Section 2). There is no visible access road to the structure, which is located approximately 70 feet south off of SE 14<sup>th</sup> Street. There is a wetland approximately 75 feet south of the structure.

**Shelton Substation:** The project site is a structure near the control house of the Shelton Substation in Mason County, Washington (Township 20 North, Range 4 West, and Donation Land Claim 37). Access is provided by a paved driveway.

**PCC Port Angeles Substation:** The project site is a structure near the control house of the Port Angeles Substation in Clallam County, Washington (Township 30 North, Range 6 West, and Section 14). The structure and equipment yard are separated from a paved parking area by a landscaped area and sidewalk.

**Highway 512:** The project site structure 5/6 of the Cowlitz Tap Chehalis – Covington No. 1 line in Pierce County, Washington (Township 19 North, Range 3 East, and Section 1). The structure is accessible from a graveled driveway.

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

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

Potential for Significance: No

Explanation: BPA historian review of the proposed project actions found no potential to cause effects to historic or archaeological resources. Memorandums documenting these findings were issued on October 3<sup>rd</sup>, 2021 for Twin Lakes, Panther Lake, Windsor, Shelton Substation, PCC Port Angeles Substation, and Highway 512.

## 2. Geology and Soils

Potential for Significance: No

Explanation: Ground disturbance would be limited to installation of new H-frames and unistruts inside the equipment yards, which have been previously disturbed.

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

Potential for Significance: No with conditions

Explanation: No special-status plants are known to be in the project areas. Additionally, the structures are located within 65 feet, or less, of unimproved or paved roadways, the use of which would minimize impacts to vegetation. Some vegetation would be crushed in accessing the structures.

Notes:

- To prevent the spread of noxious weeds, the construction vehicles would be required to be cleaned before entering a new project location if traveling off road.

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

Potential for Significance: No with Conditions

Explanation: Project locations are not located within or adjacent to critical habitat areas.

Pierce County, the location of the Highway 512 site, is known to be home to threatened Mazama pocket gophers. However, review of Washington Department of Fish and Wildlife's Mazama Pocket Gopher Status Update and Recovery Plan (2020) showed this site has not had recent or historic gopher occupancy. The soil type, Alderwood gravelly sandy loam, is used by gophers but is not a more preferred soil type. Additionally, this site has been adjacent to a residential home and used as a driveway or parking area for over 20 years. It is very unlikely gophers are present at this site. The project would have no effect on Mazama pocket gophers or any other ESA-listed or special status wildlife species.

Any local wildlife in the area be temporarily be disturbed by noise generated from project work.

Notes:

- If any active nests are found on the structures prior to construction, the construction would be delayed until the nests are unoccupied.
- At the Highway 512 site, work vehicles should remain on the graveled and previously compacted area to the west and south of the structure to avoid impact in the unlikely event Mazama pocket gophers are present in the area.

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

Potential for Significance: No

Explanation: The project sites are not located in or near water bodies.

## 6. Wetlands

Potential for Significance: No with Conditions

Explanation: The project sites are not located in wetlands. The Windsor project site is located approximately 75 feet north of a wetland, but access to the site would not occur within the wetland (see note below).

Notes:

- The Windsor site would be accessed from 14<sup>th</sup> Street and work vehicles would stay to the north of the tower to ensure they do not impact the wetland to the south of the structure.

## 7. Groundwater and Aquifers

Potential for Significance: No

Explanation: Ground disturbance would be limited to installation of H-frames in previously disturbed areas. There would be no impact to groundwater or aquifers.

## 8. Land Use and Specially-Designated Areas

Potential for Significance: No

Explanation: There would be no change of land use. The project sites house existing communications equipment.

## 9. Visual Quality

Potential for Significance: No

Explanation: The appearance of the project sites would have minimal changes to the existing conditions.

## 10. Air Quality

Potential for Significance: No

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

Potential for Significance: No

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

## 12. Human Health and Safety

Potential for Significance: No

Explanation: All applicable safety standards would be followed during project work. The project would not create conditions that would increase risk 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: 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 actions would occur in BPA fee owned areas and rights-of-way easements. T-Mobile is responsible for notifying the landowners and coordinating access.

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

Signed: /s/ Kali Levy October 12, 2021  
Kali Levy, ECT – 4 Date  
Contract Environmental Protection Specialist  
Portland State University