

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** T-Mobile Wireless Upgrades at Tiffany Park Site

**Project No.:** W0905

**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 T-Mobile to upgrade their antennas and related telecommunication equipment on transmission tower 127/4 of the Rocky Beach – Maple Valley #1 transmission line. The structure is located on land owned by King County Parks with an existing easement. Telecommunications equipment would be removed and installed on the existing tower.

On the existing structure, work would include:

- Remove two antennas, eight tower mounted amplifiers, and eight lines of coaxial cable.
- Install two antennas, a remote radio head, four remote radio units, antenna pipe mounts, hybrid cable, and conduit vertical support.

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 equipment cabinets, batteries, an ice bridges, and other associated equipment. These additional activities would occur on 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

---

<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:** T-Mobile Wireless Upgrades at Tiffany Park Site

## **Project Site Description**

Structure 127/4 of BPA's Rocky Beach – Maple Valley No. 1 transmission line is within property owned by King County Parks on the transmission right of way (ROW) in Covington, King County, Washington (Township 23 North, Range 5 East, Section 22). The ground cover at the work site consists of regularly maintained common grasses, weeds, shrubbery, and bare earth. South of the project site is characterized by residential neighborhood. North of the project site is the Cedar River Natural Zone and the Soos Creek Park and Trail. The natural zone and park are characterized by a dense mix of different trees. Approximately 450 feet to the southeast, there is a scrub/shrub wetland associated with Molasses Creek. Soil survey data indicates the project site is characterized by Alderwood gravelly sandy loam, which is not hydric.

## **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 during the proposed installation; however, this would be minimal and would not result in permanent impacts to the soil. The proposed action would have no impact to geology.

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

Potential for Significance: No

**Explanation:** While some plant loss is anticipated due to vehicle and foot crushing as a result of this project, the actions occurring in the BPA ROW are not expected to impact protected plant species. Following project completion, plant coverage would return naturally over time. The ROW is currently managed for low-growing vegetation, and there are no documented occurrences of Federal or state special-status plant species within the project area. Overall, the proposed actions would have minimal impact to plants.

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

Potential for Significance: No

Explanation: Temporary disruption of normal wildlife behavior could occur from elevated noise and human presence during project implementation. However, wildlife species that could be present in the area are likely already habituated to human activity, including vehicle traffic and other activities associated with residential development. There are no documented occurrences of any federal or state special-status species or their habitats located within the project site, and no such species or suitable habitat are expected to occur at the project site.

#### **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 site is not located in any mapped wetlands, and the soils mapped within the project site are not typically associated with wetlands. A wetland delineation was conducted in 2022 within the transmission line corridor for an unrelated BPA project. A wetland was delineated approximately 450 feet southeast of the project site; however, there is no work proposed in that area. Vehicle access to the site would stay on the access road which goes around the wetland. 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. T-Mobile 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