

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Telecommunications Equipment Upgrades at Existing Wireless Sites Through 2030

**Project Manager:** Multiple

**Location:** Multiple locations in Oregon, Washington, Idaho, Montana, California, Nevada, Wyoming and Utah.

**Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):** B1.19 Microwave, meteorological and radio towers. B1.3 Routine maintenance, B4.6 Additions and modifications to transmission facilities.

**Description of the Proposed Action:** BPA proposes to allow various telecommunications companies to upgrade their wireless network antennas and equipment at existing sites on BPA transmission structures and radio towers within BPA's transmission network through 2030. The work would consist of removing, relocating, and/or replacing antennas attached to BPA transmission and radio tower structures. In some cases, the number of antennas on the towers would decrease or increase from the original installation and/or the antenna configuration would change. Additionally, remote radio units (RRUs) or tower mounted amplifiers (TMAs) may be added to the antenna mounts. Additional work may include replacing or adding coaxial cable and raceways, and replacing or adding equipment and/or equipment cabinets within a company's equipment compound. The upgrades would not involve any soil excavation.

BPA leases space on its transmission or communication 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).

Each proposed project would be reviewed by the BPA National Environmental Policy Act (NEPA) lead to ensure that the activities fall within the range of those described in this Categorical Exclusion prior to initiating work.

**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>

Jeremy Doschka  
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:** Telecommunications Equipment Upgrades at Existing Wireless Sites Through 2030

## **Project Site Description**

Telecommunication equipment replacements would occur on existing transmission structures located within existing transmission line rights-of-way and on BPA radio towers within BPA's transmission network. These sites are typically in urban and rural residential locations. These facilities are located in BPA's service territory including Oregon, Washington, Idaho, Montana, California, Nevada, Wyoming, and Utah.

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

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

Potential for Significance: No

Explanation: BPA Cultural Resources staff has determined that the proposed undertaking meets Stipulation I.A.1 of *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* (executed December 19, 2024). No further Section 106 consultation is required.

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

Potential for Significance: No

Explanation: No ground disturbing work would take place as part of the proposed activities. Some minor soil compaction may occur from vehicles and equipment at the sites. There would be no significant impacts to geology and soils.

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

Potential for Significance: No

Explanation: No vegetation removal would take place as part of the proposed activities with the occasional exception of very minor removal of branches brush or grasses that may interfere with access to equipment vaults or buildings. Some minor soil compaction may occur from vehicles and equipment at the sites. There would be no significant impacts to plants.

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

Potential for Significance: No

Explanation: Most wireless locations are in urban or suburban landscapes with limited wildlife habitat. No wildlife habitat removal would take place as part of the proposed activities. Some very minor noise and visual disturbance could occur at select locations, but these disturbances would be temporary, transitory and likely similar to background levels of noise and visual disturbance. No significant impacts to wildlife are expected.

## **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 at existing facilities and within existing site boundaries. No in-water work would take place. No sediment or hazardous material releases are expected from the proposed actions. No impacts to water bodies, floodplains or fish are expected.

## **6. Wetlands**

Potential for Significance: No

Explanation: All work would take place at existing facilities and within existing site boundaries. No work in wetlands would take place. No sediment or hazardous material releases are expected from the proposed actions. No impacts to wetlands are expected.

## **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: All work would take place at existing facilities and within existing site boundaries. No sediment or hazardous material releases are 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 existing transmission facilities with existing wireless network equipment already in place. No changes in land use are proposed. No impact to land use or specially-designated areas is expected.

## **9. Visual Quality**

Potential for Significance: No

Explanation: All work would take place at existing transmission facilities 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 sites and would generally not be overtly noticeable from nearby viewing areas. No significant impacts to visual quality are expected.

## **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 significant 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 significant impacts from noise are expected.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: No releases of hazardous materials is expected. Wireless carriers are required to use equipment that meets FCC standards for radio wave emissions. 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: Underlying landowners would be notified of any work or access requirements as needed.

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

Signed:

Jeremy Doschka ECT-4  
Environmental Protection Specialist