

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** AT&T Wireless Upgrades at Bangor Site

**Project No.:** W1062

**Project Manager:** Brian Keith, TELP-TPP-3

**Location:** Kitsap 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 AT&T to upgrade an existing wireless telecommunications site located on tower 14/6 of the Kitsap - Bangor No. 1 transmission line. The structure is located on commonly-owned property with an existing easement. Telecommunications equipment would be removed and installed on the existing tower.

On the existing structure, work would include:

- Remove nine panel antennas.
- Add six antennas, six tower mounted amplifiers, and other associated equipment.

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 installing new racks, batteries, and other related groundwork. These additional activities would occur on private 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

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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:** AT&T Wireless Upgrades at Bangor Site

## **Project Site Description**

Structure 14/6 of BPA's Kitsap - Bangor No. 1 transmission line is on commonly owned property on the transmission right of way (ROW) in Poulsbo, Kitsap County, Washington (Township 26, Range 1 East, Section 28). The ground cover at the work site consists of regularly maintained grasses, bare earth, and trees. Outside of the project site are residential neighborhoods. Approximately 800 feet to the west of the project site is the Bangor Naval Submarine Base which is a superfund site. The superfund site contains many different chemicals that have infiltrated the soil and groundwater. 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: No ground disturbance is anticipated. Access to the site is provided by paved and dirt roads which would not result in vegetation disturbance. Crushing may occur due to vehicles parking off the road. Following project completion, plant coverage would return over time. There are no documented occurrences of any special-status plant species, or plant species protected under the federal Endangered Species Act (ESA) occurring at the project site. Therefore, the proposed project would not impact protected plant species.

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

Potential for Significance: No

Explanation: No wildlife habitat removal, including the removal of active bird nests, would take place as part of the proposed activities. Some minor noise and visual disturbance could occur during work, but these disturbances would be temporary and return to pre-existing conditions following equipment upgrades. Little impact to wildlife and no effect to ESA-listed or sensitive wildlife species 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 on the existing BPA transmission structure and within the existing site. 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: The project site is not located within a wetland nor is there any work associated with wetlands. Therefore, no impacts to wetlands are expected.

#### **7. Groundwater and Aquifers**

Potential for Significance: No

Explanation: All work would take place on the existing BPA transmission structure and within the existing site. 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 on the existing BPA transmission structure with existing wireless network equipment already in place. No changes in land use are proposed. No impacts to land use or specially-designated areas are expected.

#### **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. No substantial impacts to visual quality are expected. Overall, the proposed actions would have minimal impact on visual quality.

## 10. Air 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. No substantial impacts to visual quality are expected. Overall, the proposed actions would have minimal impact on visual quality.

## 11. Noise

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.

## 12. Human Health and Safety

Potential for Significance: No

Explanation: The proposed work would not include any ground disturbance, and the proposed site is outside of the superfund site. There would be no effect from the chemicals inside the superfund site on human health and safety for this project.

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 commonly owned property with an existing easement. AT&T 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