

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** T-Mobile Telecommunications Upgrade at Tahoma Site

**Project No.:** W1058

**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 an existing wireless telecommunication site on structure 4/5 of BPA's Covington – Maple Valley No. 2 transmission line in Tahoma, King County, Washington. The structure is located on private property with an existing easement. Telecommunications equipment would be removed and installed on the existing transmission tower and in the existing equipment compound adjacent to the tower.

On the existing structure, BPA would on behalf of T-Mobile:

- Remove six antennas, thirteen coax cables, and fifteen diplexers.
- Install three antennas, eight remote radio units, six pipes, two hybrid trunks, and an HCS Pendant.

BPA leases space on its transmission towers 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 trenching, cabinet replacement, installation and removal of telecommunication equipment, 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

---

<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 Telecommunications Upgrade at Tahoma Site

## **Project Site Description**

Structure 4/5 of Bonneville Power Administration's (BPA) Covington – Maple Valley No. 2 transmission line is on private property on the transmission right-of-way (ROW) in Sammamish, King County, Washington. (Township 22 North, Range 6 East, Section 18). The ground cover of the site consists of regularly maintained common grasses, weeds, and bare ground. Outside of the ROW is low density residential housing, roads, and scattered forested areas. Soil survey data indicates the project area is characterized by Alderwood grave sandy loam, which is not hydric. There are no wetlands or waterways within or immediately adjacent to the site.

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

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

Potential for Significance: No

Explanation: Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and implementing regulations 36 CFR 800, BPA initiated consultation on May 12, 2025, which detailed the proposed project and determined the project would result in no adverse effect to historic properties (BPA CR Project No.: WA 2025 091, DAHP Log No.: 2025-05-03023). BPA had previously determined that the Covington-Maple Valley No. 2 Transmission Line is eligible for listing in the National Register of Historic Places. BPA did not identify any other known historic properties in the Area of Potential Effect (APE).

Consulting parties included the Muckleshoot Indian Tribe, the Puyallup Tribe of Indians, the Snoqualmie Indian Tribe, and the Washington State Department of Archaeology and Historic Preservation (DAHP). On May 13, 2025, DAHP responded, concurring with the determination of effects. The Snoqualmie Indian Tribe responded on May 13, 2025, indicating they had no comments. No other responses were received during the 30-day period.

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

Potential for Significance: No

Explanation: Minor soil compaction may result from increased traffic to the project site; however, vehicles would stay on existing access roads and immediate borders of the existing transmission facilities and wireless compounds. Best management practices (BMPs) would be implemented for erosion and dust control. No impact to geology would be expected from the proposed projects.

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

Potential for Significance: No

Explanation: Minor amounts of vegetation would be crushed and trampled during construction activities; however, vegetation would return shortly after project completion. 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.

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

Potential for Significance: No

Explanation: The work site is located in a maintained transmission line corridor. 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: No water bodies, floodplains, or fish habitat is located within or near the project site. Therefore, the proposed action would not impact water bodies or floodplains and would have no effect on special status fish species or habitat.

#### **6. Wetlands**

Potential for Significance: No

Explanation: All work would take place at the existing facility and within existing site boundaries. No work in wetlands would take place. No sediment or hazardous materials 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 the existing BPA transmission structure and within the existing site boundary. 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 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 a specially-designated areas. 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.

#### **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 releases of hazardous materials are 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 private 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