

# Categorical Exclusion Determination

Bonneville Power Administration  
Department of Energy



**Proposed Action:** Verizon Ross Microwave Dark Star Upgrade Project

**Project No.:** W1054

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

**Location:** Clark County, Washington.

**Categorical Exclusion Applied (from 10 C.F.R. Part 1021):** B1.7 Electronic Equipment, B1.19 Microwave, meteorological, and radio towers, B1.31 Installation or relocation of machinery and equipment.

**Description of the Proposed Action:** The Bonneville Power Administration (BPA) proposes to allow Verizon Wireless (Verizon) to modify an existing wireless installation on the communications tower at BPA's Ross Substation on BPA fee-owned land in Clark County, Washington.

Proposed actions on the existing tower would include:

- Removing Sprint radio frequency equipment.
- Installing antennas, remote radio units, and associated mounting hardware.
- Installing a surge protector.
- Installing direct current (DC) and fiber cable jumpers.

Verizon would reconfigure the existing ground-level equipment compound, including installation of equipment on the existing concrete pads. Ground disturbing activities would include installing an ice bridge and an h-frame supporting the ice bridge adjacent to the existing concrete pads. Additionally, new conduit for power and fiber would be installed in two trenches. The first trench would be within the existing fenced facility, adjacent to the concrete pad, measuring approximately 36 feet long by 2 feet wide by 4 feet deep. The second trench would be for fiber and would extend outside the fenced facility and proceed southward adjacent to the eastside fence. This trench would measure approximately 32 feet long by 2 feet wide and 4 feet deep.

BPA authorizes the use of and manages its fee-owned lands pursuant to its authority under sections 2(e) and 2(f) of the Bonneville Project Act. 16 U.S.C. § 832a(e)-(f). BPA leases space on its 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).

**Findings:** In accordance with Section 1021.102 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; 90 FR 29676, July 3, 2025 [Interim Final Rule]) and *DOE National Environmental Policy Act (NEPA), Implementing Procedures* (dated June 30, 2025), BPA has determined the following:

- 1) The proposed action fits within a class of actions listed in Appendix B of 10 CFR 1021;
- 2) The proposal has not been segmented to meet the definition of a categorical exclusion; and
- 3) There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal (see attached Environmental Evaluation).

Based on these determinations, BPA finds that the proposed action is categorically excluded from further NEPA review.<sup>1</sup>

Jessica A. Heppler  
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 the interim final rule to revise DOE NEPA regulations implementing NEPA at 10 C.F.R. Part 1021 and NEPA Implementing Procedures (dated June 30, 2025), to meet its obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

# Categorical Exclusion Environmental Evaluation

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:** Verizon Ross Microwave Dark Star Upgrade Project

## **Project Site Description**

The project site is located at BPA's Ross Substation in Vancouver, Clark County, Washington (T2N R1E Section 14). Project activities would be carried out within the boundaries of the substation property, in an area both fenced and unfenced around a telecommunications tower. Surface cover within the project site consists of concrete, gravel and maintained grass. The area outside the substation may be characterized as primarily residential, with some light industrial, school facilities and associated open spaces, and utility-owned vacant property. The National Hydrography Dataset indicates the nearest body of water is a creek approximately 200 feet to the north of the telecommunications tower, and soil data from the Natural Resources Conservation Service indicates the project site is composed of non-hydric soils.

## **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 *Program Comment for Communications Projects on Federal Lands and Property* (March 13, 2024). Pursuant to Stipulation VI.B. "Collocation of communications antennae," and IX. "Installation of buried communication cable," no further Section 106 review and consultation is required. There is no proposed increase in tower height, and no special requirement in existing permits and easements regarding Section 106. The installation of buried cables would take place in previously disturbed areas. A records check using the Washington Information System for Architectural and Archeological Records Data (WISAARD) database confirms there are no known historic properties within the area of potential effect as defined under IX.A and B.

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

Potential for Significance: No.

Explanation: There would be some soil disturbance associated with the installation of the ice-bridge and H-frame as well as trenching both inside and outside the fenced area surrounding the telecommunications tower. The trenching would pass through areas graveled to prevent vegetation growth, and the area outside the fence in an area managed for low growing grasses. Verizon would be responsible for implementing standard construction best management practices (BMPs) to address temporary erosion and sediment control where the trenching would occur. Geology is not anticipated to be affected.

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

Potential for Significance: No.

Explanation: Trench excavation outside the tower fence would result in removal of herbaceous ground cover along the length of the trenched area. Areas that would be temporarily disturbed by trenching would be revegetated soon after project completion. 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.

Notes: Upon project completion, the applicant would reseed the temporarily disturbed areas with seed mixes that are appropriate for the area.

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

Potential for Significance: No.

Explanation: There are no documented occurrences of special-status wildlife species or suitable habitat present in the project area. Minor and temporary disturbance of common wildlife species could occur from elevated noise during construction. Because the work would be occurring with a fenced and currently operating substation yard, any wildlife present are likely used to human presence and noise.

Therefore, the proposed project may have a temporary impact on general wildlife species during construction activities, but the proposed action would not have a permanent impact or an effect on special-status wildlife species or habitats.

#### **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 in any surface water or fish bearing stream and is not located within a floodplain.

#### **6. Wetlands**

Potential for Significance: No.

Explanation: The project action area is not within a wetland.

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

Potential for Significance: No.

Explanation: While some project actions would disturb soil, they are not expected to reach depths that would impact aquifers and groundwater.

#### **8. Land Use and Specially-Designated Areas**

Potential for Significance: No.

Explanation: There would be no change in land use or specially designated areas as a result of this project.

#### **9. Visual Quality**

Potential for Significance: No.

Explanation: The proposed action would result in a change in the appearance of the telecommunications tower by trenching, removing and installing new antennas and other equipment. However, these changes would be minor and would be consistent with the existing visual quality of the area.

#### **10. Air Quality**

Potential for Significance: No.

Explanation: Depending on the vehicles and equipment used, temporary and minor dust and vehicle emissions could increase in the local area during project implementation. There would be no long-term impact to air quality following completion of the project.

## **11. Noise**

Potential for Significance: No.

Explanation: Temporary construction noise would occur during daylight hours. No ongoing noise increase is expected for this area as a result of this project.

## **12. Human Health and Safety**

Potential for Significance: No.

Explanation: The project would not generate or use hazardous materials and would not create conditions that would increase risk to human health and safety. No impact to human health and safety is expected as a result of project activities.

### **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 BPA fee-owned property. There are no other landowners that would need to be notified or involved.

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

Signed:

Jessica A. Heppler  
Environmental Protection Specialist