DATE: July 27, 2012

REPLY TO ATTN OF: KEC-4

SUBJECT: Environmental Clearance Memorandum

TO: Tim Murray
    Project Manager – TELP-TPP-3

Proposed Action: Four AT&T Wireless Communication Site Upgrades

Categorical Exclusion Applied (from Subpart D, 10 C.F.R. Part 1021):
B1.7 Acquisition, installation, operation, and removal of communication systems…
B1.19 Siting, construction, and operation of microwave and radio communication towers and associated facilities…

Locations:
Township 3 North, Range 6 West, Section 14, Clallam County, Washington
Township 26 North, Range 42 East, Section 16, Spokane County, Washington
Township 28 North, Range 6 East, Section 4, Snohomish County, Washington
Township 38 North, Range 3 East, Section 14, Whatcom County, Washington

Proposed by: Bonneville Power Administration (BPA)

Description of the Proposed Action:
AT&T has submitted a Land Use Review Request for BPA to approve upgrades to fiber on four of its existing wireless communication sites located atop BPA transmission and communication towers. BPA has a commercial lease agreement with AT&T for collocation on its facilities and AT&T must request permission to update those facilities when they have the potential to affect BPA’s transmission resources.

All ground disturbance would occur in areas that have been previously disturbed by transmission line construction and right-of-way clearing activities. Construction vehicles would utilize existing gravel access roads. Project specific ground disturbance is described below:

Port Angeles
Port Angeles is located at Township 3 North, Range 6 West, Section 14 in Clallam County, Washington. Upgrades would occur on BPA’s existing Port Angeles Substation microwave tower. AT&T would excavate two 4’ x 4’ x 4’ fiber vaults, one near the northwest corner of BPA’s substation property to intercept an existing fiber conduit, and another about 60 feet southeast. About 70 feet of boring underneath the Substation parking lot and existing landscaped curb would be dug to accommodate 4-inch PVC conduit between the proposed fiber vaults. Every 40 feet an OMNI marker would be placed above the proposed conduit. The trench would then be backfilled to existing grade.
Indian Trails
Indian Trails is located at Township 26 North, Range 42 East, Section 16, Spokane County, Washington. Upgrades would occur at tower 78/1 on BPA’s Grand Coulee – Bell No. 3 transmission line. AT&T would excavate a 2’ x 3’ x 3’ fiber vault within the existing fenced wireless facility located adjacent to BPA’s transmission tower. From the vault, an approximately 3-foot deep, 18 inch wide, and 200-foot-long trench would be dug east of the tower to an existing fiber run off BPA right-of-way. Four inch conduit would be placed in the trench and every 40 feet an OMNI marker would be placed above the conduit. The trench would then be backfilled to existing grade.

Snohomish East
Snohomish East is located at Township 28 North, Range 6 East, Section 4 in Snohomish County, Washington. Upgrades would occur at tower 129/6 on BPA’s Chief Joseph – Snohomish Nos. 3&4 transmission line. AT&T would excavate for a 2’ x 3’ x 3’ fiber vault at the base of the existing BPA transmission tower. The vault would intercept an existing 2-inch PVC conduit. Every 40 feet an approximately 2-foot deep hole would be excavated to place an OMNI marker above the existing conduit.

East Bellingham
East Bellingham is located at Township 38 North, Range 3 East, Section 14 in Whatcom County, Washington. Upgrades would occur at tower 74/2 on BPA’s Monroe – Custer No. 1 transmission line. AT&T would excavate two 2’ x 3’ x 3’ fiber vaults, one at the base of BPA’s transmission tower, and another southwest of the tower and adjacent to an existing utility pole. An approximately 3-foot deep, 18 inch wide, and 400-foot-long trench would be dug parallel to an existing access road to connect each vault. Four inch conduit would be placed in the trench and every 40 feet an OMNI marker would be placed above the conduit. The trench would then be backfilled to existing grade.

BPA initiated Section 106 consultation with the Washington Department of Archaeology and Historic Preservation (DAHP), Confederated Tribes of the Colville, the Jamestown S’Klallam Tribe, the Lower Elwha Klallam Tribe, the Lummi Tribe, the Nooksack Indian Tribe, the Spokane Tribe of the Spokane Reservation, the Tulalip Tribes, and the Upper Skagit Indian Tribe on April 3, 2012. In May 2012 a field survey of each communication site was conducted. On June 26, 2012 BPA submitted a cultural resource report determining that no historic properties would be affected as a result of the proposed project. On July 3, 2012, DAHP concurred with BPA’s determination. No Tribes responded to the report.

Findings: BPA has determined that the proposed action complies with Section 1021.410 and Appendix B of Subpart D 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, July 9, 1996; 61 FR 64608, Dec. 6, 1996, 76 FR 63764, Nov. 14, 2011). The proposed action does not present any extraordinary circumstances that may affect the significance of the environmental effects of the proposal. The proposal is not connected [40 C.F.R. 1508.25(a)(1)] to other actions with potentially significant impacts, has not been segmented to meet the definition of a categorical exclusion, is not related to other proposed actions with cumulatively significant impacts [40 C.F.R. 1508.25(a)(2)], and is not precluded by 40 C.F.R. 1506.1 or 10 C.F.R. 1021.211. Moreover, the proposed action would not (i) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, (ii) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities, (iii) disturb hazardous substances, pollutants, contaminants, or Comprehensive Environmental Response, Compensation and
Liability Act-excluded petroleum and natural gas products that pre-exist in the environment such that there would be uncontrolled or unpermitted releases, (iv) have the potential to cause significant impacts on environmentally sensitive resources, or (v) 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.

This proposed action meets the requirements for the Categorical Exclusion referenced above. We therefore determine that the proposed action may be categorically excluded from further NEPA review and documentation.

/s/ Claire McClory  
Claire McClory  
Environmental Project Manager

Concur:

/s/ Lydia T. Grimm, for:  
Stacy Mason  
NEPA Compliance Officer  
Date: July 27, 2012

Attachment:  
Environmental Checklist for Categorical Exclusions
Environmental Checklist for Categorical Exclusions

Name of Proposed Project: Four AT&T Wireless Communication Site Upgrades

Work Order #: 00297508, Task 03

This project does not have the potential to cause significant impacts on the following environmentally sensitive resources. See 10 CFR 1021, Subpart D, Appendix B for complete descriptions of the resources. This checklist is to be used as a summary – further discussion may be included in the Categorical Exclusion Memorandum.

<table>
<thead>
<tr>
<th>Environmental Resources</th>
<th>No Potential for Significance</th>
<th>No Potential, with Conditions (describe)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Historic Properties and Cultural Resources</td>
<td>X</td>
<td></td>
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<tr>
<td>2. T &amp; E Species, or their habitat(s)</td>
<td>X</td>
<td></td>
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<tr>
<td>3. Floodplains or wetlands</td>
<td>X</td>
<td></td>
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<td>4. Areas of special designation</td>
<td>X</td>
<td></td>
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<td>5. Health &amp; safety</td>
<td>X</td>
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<td>6. Prime or unique farmlands</td>
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<td></td>
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<td>7. Special sources of water</td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>8. Other (describe)</td>
<td>X</td>
<td></td>
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</tbody>
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Signed: /s/ Claire McClory  Date: July 27, 2012