

Categorical Exclusion Determination

Bonneville Power Administration
Department of Energy



Proposed Action: Verizon Wireless Upgrades at Custer Site

Project No.: W1002

Project Manager: Brian Keith, TELP-TPP-3

Location: Whatcom 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 Verizon to upgrade their antennas and related equipment at Custer Site in Whatcom County, Washington (Township 40, Range 1, Section 36).

The work would involve installing, removing, relocating, or replacing antennas attached to BPA transmission structures. Additional equipment such as remote radio units (RRUs), over voltage protection devices (OVPs), tower mounted amplifiers (TMAs), and other associated antenna mounting equipment may be added or removed. Coaxial cables may be replaced or added through existing or new conduit installed on the ground or the tower structure. Additional groundwork would be required for the communications site, which may include diplexers, converters, and other associated equipment. All work would be above ground with no ground disturbance.

The site would be accessed using existing access roads and routes of travel. The upgrades would not include any access road improvement or modifications. Any activities that involve hazardous materials such as lead-acid batteries containing mercury or other hazardous materials would be disposed of at a designated hazardous waste facility.

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).

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. ¹

Kane Barrett Finders
Environmental Protection Specialist

Concur:

Katey C. Grange
NEPA Compliance Officer

Attachment(s): Environmental Checklist

¹ 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 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: Verizon Wireless Upgrades at Custer Site

Project Site Description

Custer site is BPA fee-owned property Whatcom County, Washington (Township 40, Range 1, Section 36). The ground cover of the site consists of bare earth, grasses, and some weeds. Outside of the project site there is low density residential and agricultural land. The project site is characterized by Lynden 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 result from increased traffic to the project site; however, vehicles would stay on existing access roads and immediate borders of the existing transmission facility and wireless compound. 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: Small amounts of vegetation may be crushed or removed as a result of the project; however, vegetation that would be impacted would be located on access roads or within the boundaries of the transmission structure which may need to be removed to keep facilities clear for access. There would be limited impacts to plants and no effect to ESA listed or sensitive plant species would occur.

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 at the project site, but these disturbances would be temporary and return to preexisting conditions following equipment upgrades. If any active nests are found on the structures prior to construction, the construction would be delayed until the nests are unoccupied. Limited impacts 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 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, and BMPs would be utilized for erosion control measures. 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 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 on the existing tower and within the existing fenced equipment compound. No sediment or hazardous material releases are expected from the proposed action. 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 tower and within the existing fenced equipment compound. 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 on the existing tower and within the existing fenced equipment compound. Some minor changes in the visual appearance of the antennas, wiring, and equipment layout may occur, but these would be consistent with the existing use 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 release of hazardous materials is expected. Verizon would be required to use equipment that meets 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 located on BPA property owned in fee. Verizon would be required to coordinate with BPA.

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