CATEX Checklist

Action Name:	VA 810 Vermont T-Mobile Upgrades
Action Location:	VA Headquarters Building, 810 Vermont Avenue NW, Washington, DC
Action Description:	T-Mobile proposes to install (2) new mmWave panel antennas and remove (2) existing small cell panel antennas within an existing array.
Category [CATEX]:	Pursuant to paragraph 5.4 of the PBS NEPA Desk Guide (Oct 1999), this action is covered by Checklist CATEX Category (n): *"Installation of antennas consistent with GSA Bulletin FPMR D-242, "Placement of commercial antennas on Federal property."*

Part A: All Checklist CATEX Actions

	YES	NO	Need Data
A. Is the action likely to be inconsistent with any applicable Federal, State, Indian tribal, or local law, regulation, or standard designed to protect any aspect of the environment?		**X**	
B. Is the action likely to have results that are inconsistent with locally desired social, economic, or other environmental conditions?		**X**	
C. Is the action likely to result in the use, storage, release and/or disposal of toxic, hazardous, or radioactive materials or in the exposure of people to such materials?		**X**	
D. Is the action likely to adversely affect a significant aspect of the natural environment?		**X**	
E. Is the action likely to adversely affect a significant aspect of the sociocultural environment?		**X**	
F. Is the action likely to generate controversy on environmental grounds?		**X**	
G. Is there a high level of uncertainty about the action's environmental effects?		**X**	
H. Is the action likely to do something especially risky to the human environment?		**X**	
I. Is the action part of an ongoing pattern of actions (whether under the control of GSA or others) that are cumulatively likely to have adverse effects on the human environment?		**X**	
J. Is the action likely to set a precedent for, or represent a decision in principle about, future GSA actions that could have significant effects on the human environment?		**X**	
K. Is the action likely to have some other adverse effects on public health and safety or on any other environmental media or resources that are not specifically identified above?		**X**	

Part B: Conclusions

1. The action is a CATEX and requires no further environmental review.	**X**
2. The action is a CATEX but requires further review under one or more other environmental authorities (list).	
3. The action requires an EA.	
4. The action requires an EIS.	

Part C: Certifications

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8/12/2025
Program Staff — Date
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DocuSigned by:
Lindsey Veas
8/12/2025
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REQA Representative — Date

CATEX CHECKLIST WRITE-UP

Part A: Project Description

Department of Veterans Affairs (VA) Headquarters Building, 810 Vermont Avenue NW, Washington, DC 20571. This building is owned and operated by the General Services Administration (GSA).

T-Mobile supports the National Public Safety Broadband Network (FirstNet) to support National and Homeland Security, including supporting infrastructure for events on the National Mall in Washington, D.C.

T-Mobile currently has three sectors at VA HQ. Proposed changes would occur at Sectors One and Two.

- Sector One: 4 panel antennas, 2 remote radio heads, 2 hybrid cables
- Sector Two: 4 panel antennas, 2 remote radio heads, 2 hybrid cables
- Sector Three: 4 panel antennas, 2 remote radio heads, 2 hybrid cables

Modifications include removal of two existing small cell antennas and installation of two new mmWave antennas at Sectors One and Two. The two new mmWave antennas (also panels) would be placed at the front of the building using a similar pipe mount design as other antennas currently in place. Sector Three would be unchanged. The total antenna count would be unchanged. The new mmWave antennas would be painted to match the building's exterior façade.

- Sector One: 4 panel antennas, 2 remote radio heads, 2 hybrid cables
- Sector Two: 4 panel antennas, 2 remote radio heads, 2 hybrid cables
- Sector Three: 4 panel antennas, 2 remote radio heads, 2 hybrid cables

All obsolete and unused equipment would be removed from the building.

Figure 1. Sector One Existing & Proposed Conditions at 810 Vermont (northeast side)

Figure 2. Sector One Existing & Proposed Conditions at 810 Vermont (northeast side)

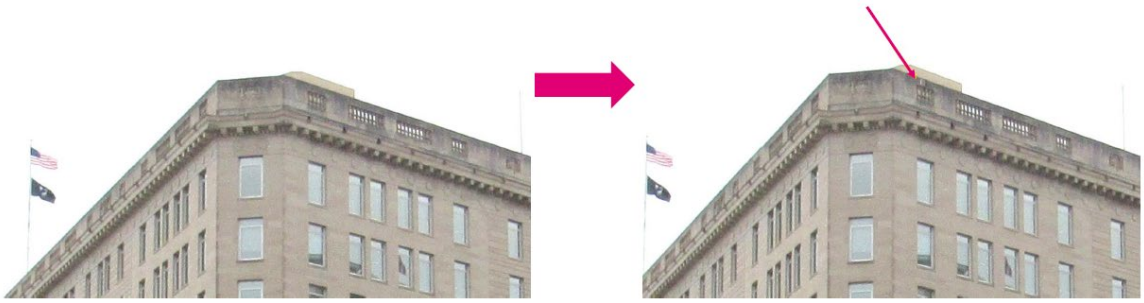


Figure 3. Sector Two Existing & Proposed Conditions at 810 Vermont (south side)

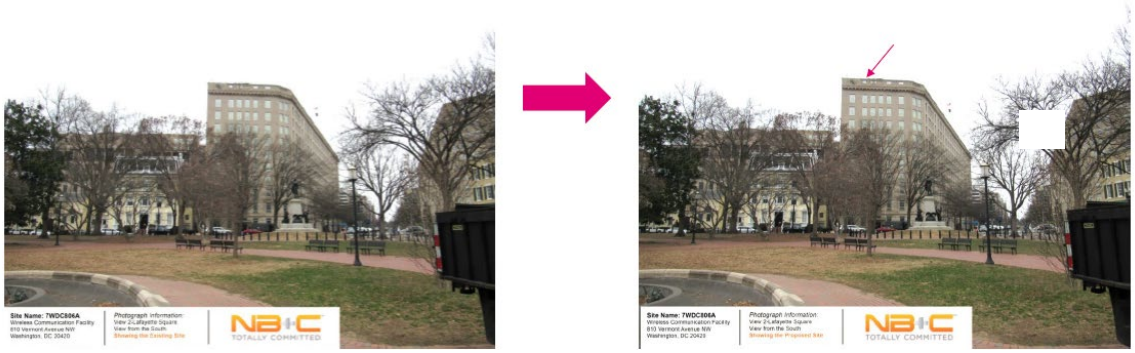
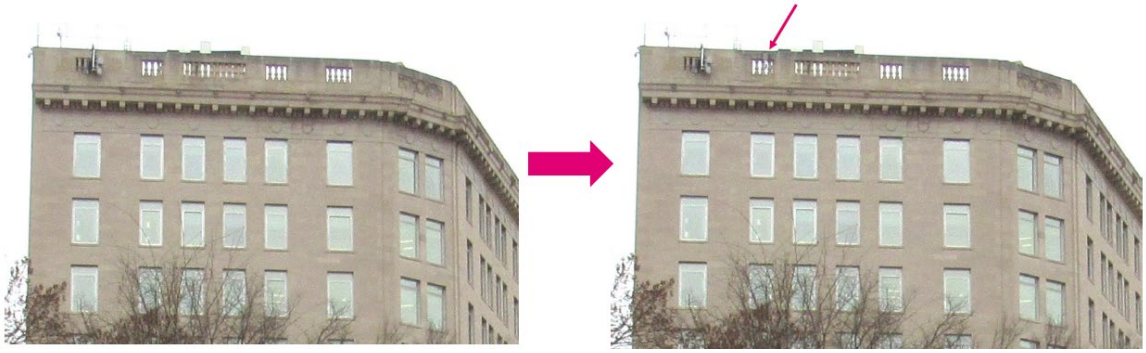


Figure 4. Sector Two Existing & Proposed Conditions at 810 Vermont (south side)



T-Mobile will complete a post RR/EME study 90 after construction complete date and provide a copy to GSA.

Part B: Checklist Justifications

A. Is the action likely to be inconsistent with any applicable Federal, State, Indian tribal, or local law, regulation, or standard designed to protect any aspect of the environment?

The proposed action would comply with all applicable Federal, State, local, and Tribal laws, standards and regulations designed to protect the environment. All work would be performed in accordance with all applicable codes and regulations. The installation and equipment would be well-maintained for its continued safe operation. The proposed project would comply with RF Exposure Guidelines with FCC and Occupational Safety & Health Administration (OSHA) regulations. These proposed antennas and radios would not generate any solid waste or water or air pollutants. Installation of the proposed antennas would be conducted in compliance with the International Building Code 2012.

Following installation, T-Mobile would conduct regular periodic inspections of the site to ensure its continued safe operation. The roof is a secured area that is not accessible by the general public.

B. Is the action likely to have results that are inconsistent with locally desired social, economic, or other environmental conditions?

The action would be consistent with locally desired social, economic, and other environmental conditions. The action is not likely to have any adverse effect on the traffic patterns, access and circulation, traffic volume, utilities, or be inconsistent with existing zoning.

C. Is the action likely to result in the use, storage, release and/or disposal of toxic, hazardous, or radioactive materials or in the exposure of people to such materials?

The FCC established safety guidelines relating to potential RF exposure from cell sites. The FCC developed the standards, known as Maximum Permissible Exposure (MPE) limits, in an interagency consultation that included the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), and OSHA. Areas or portions of this transmitter site may be susceptible to high power densities that could cause exposures in excess of the FCC guidelines for transient personnel working in or near the antenna array. These areas would be demarcated by conspicuously posted signage that identifies the potential exposure. Signage would be viewable regardless of the viewer's position. The roof is a secured area that is only accessible by those with appropriate credentials and a need for access, such as site maintenance. Physical barriers would be employed as an additional administrative control to complement RF signage and physically demarcate an area in which RF exposure levels may exceed the FCC General Population limit.

D. Is the action likely to adversely affect a significant aspect of the natural environment?

According to the FEMA Flood Insurance Rate Map (FIRM) (Map number 1100010018C, effective date 09/27/2010), the 810 Vermont Building is not within a regulated floodplain. The proposed action is not likely to adversely affect a significant aspect of the natural environment and would be located on the existing rooftop. Modification of the existing rooftop array would not include ground disturbance. Therefore, the action would comply with EO 11988.

E. Is the action likely to adversely affect a significant aspect of the socio-cultural environment?

The 810 Vermont Building is a National Historic Landmark, and is within the viewshed of several listed buildings, including McPherson Square, Lafayette Square, and the White House. Because of the careful placement of the antennas, including GSA installation protocols for both reversibility and minimal visibility, GSA has determined that the proposed upgrades will have no adverse effect on the Landmark or nearby and adjacent historic resources, including historic open space.

The Washington D.C. State Historic Preservation Office (SHPO) reviewed the proposed project in accordance with Section 106 of the National Historic Preservation Act (NHPA), as amended. On August 6, 2025, the SHPO concurred that this proposed project would have **no adverse effect** on historic properties.

F. Is the action likely to generate controversy on environmental grounds?

The proposed action is unlikely to generate controversy on environmental grounds. The proposed action is not anticipated to have adverse impacts.

Historic and cultural sites or visual elements: Because of the careful placement of the proposed antennas and the removal of the temporary antennas, GSA has determined that the proposed upgrades will have no adverse effect on the subject building or adjacent historic resources, including historic open space.

Air pollution: The installation and removal of antennas on the roof of the existing building is not anticipated to emit or contribute to air pollution and the existing levels of air pollution at this site would remain unchanged. Therefore, the proposed project would have no effect on air pollution.

Natural resources and habitat: The project site is within the range of three species protected under the Endangered Species Act (ESA). The project would have no effect on the endangered Northern Long-eared Batt (*Myotis septentrionalis*), proposed endangered Tricolored Bat (*Perimyotis subflavus*), or the candidate monarch butterfly (*Danaus plexippus*) as the existing project site does not contain the appropriate habitat requirements for these species. Any potential occurrence within the project site would be transient. The project site is not within or adjacent to a floodplain or a wetland. Absence of active nests of birds protected under the Bald and Golden Eagle Act or the Migratory Bird Treaty Act (MBTA) would be confirmed prior to implementation. If active nests are present within the work area such that work may not be completed, GSA will engage the U.S. Fish and Wildlife Service (USFWS) and the U.S. Department of Agriculture (USDA) to determine the best course of action.

Traffic: The installation and removal of antennas on the roof of the existing building would involve one major effort for installation followed by regular and as-needed maintenance. Installation and maintenance vehicles would reserve parking at the loading dock and reserve use of a freight elevator for the duration required. Street accommodations would not be necessary to facilitate installation or future maintenance. Therefore, the proposed project would have no effect on traffic.

Neighborhood quality: The 810 Vermont Building is in downtown DC with an adjacent entrance to the Metro at the street level on Vermont Avenue and I Street. McPherson Square is directly to the north with office buildings, hotels, and restaurants. To the east are the Bowen Building and Franklin Park. To the south are Lafayette Square and the White House.

G. Is there a high level of uncertainty about the action's environmental effects?

There is not a high level of uncertainty about the potential environmental effects resulting from the proposed action. Antennas are currently installed at this location; furthermore, GSA and communications providers are experienced in projects involving antenna installation and replacement.

H. Is the action likely to do something especially risky to the human environment?

There is not a high level of risk to the human environment as long as the mitigation measures contained within this this report are adhered to at all times when in close proximity to RF radiating elements. Access points to the roof areas would be inaccessible to the public and posted with appropriate signage. Antennas would be clearly marked on all sides by signage that clearly articulates the hazards of RF radiation.

I. Is the action part on an ongoing pattern of actions (whether under the control of GSA or others) that are cumulatively likely to have adverse effects on the human environment?

The action is not part of an ongoing pattern of actions that are cumulatively likely to have adverse effects on the human environment.

J. Is the action likely to set a precedent for, or represent a decision in principle about, future GSA actions that could have significant effects on the human environment?

The action is not likely to set a precedent for, or represent a decision in principle about, future GSA actions that could have significant effects on the human environment. The installation and removal of antennas is consistent with GSA Bulletin FPMR D-242, "Placement of commercial antennas on Federal property."

K. Is the action likely to have some other adverse effect on public health and safety or any other environmental media or resources that are not specifically identified above?

The action is not likely to have some other adverse effect on public health and safety or on any other environmental media or resources that are not specifically identified above. Personnel that require access in very close proximity (within 3 feet) to the radiating element of the antennas would employ Lock-Out/Tag-Out procedures to isolate the RF source prior to servicing equipment. Personnel would have proper training to control exposure during maintenance and installation if locked out/tagged out procedures cannot be exercised to antennas that are in close proximity. The use of RF Personal Protection Monitors that match all frequencies will be mandated for persons performing such work.