

CATEX Checklist

Action Name:	HHS Hubert Humphrey Bldg T-Mobile Array Modification
Action Location:	Humphrey Bldg, 200 Independence Ave SW, Washington, DC
Action Description:	T-Mobile proposes to install (2) mmWave panel antennas and remove (2) antennas at an existing rooftop array. The total number of T-Mobile antennas would be unchanged.
Category [CATEX #]:	Pursuant to paragraph 5.4 of the PBS NEPA Desk Guide (Oct 1999), this action is covered by Checklist CATEX Category (n): <i>"Installation of antennas consistent with GSA Bulletin FPMR D-242, "Placement of commercial antennas on Federal property."</i>

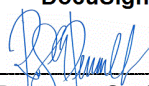
Part A: All Checklist CATEX Actions

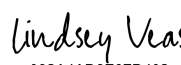
	YES	NO	Need Data
A. Is the action likely to be inconsistent with any applicable Federal, State, Indian tribal, or local law, regulation, or standard designed to protect any aspect of the environment?		X	
B. Is the action likely to have results that are inconsistent with locally desired social, economic, 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

DocuSigned by:

 8/14/2025
 Program Staff
 D0C4CDF4ECA343D... Date

DocuSigned by:

 8/11/2025
 R32A4AD0E97D482
 REQA Representative Date

CATEX CHECKLIST WRITE-UP

Part A: Project Description

Health and Human Services (HHS) Hubert Humphrey Building, 200 Independence Avenue SW, Washington DC 20024. This building is owned and operated by the General Services Administration (GSA).

T-Mobile is licensed by the Federal Communications Commission (FCC) to provide wireless service, including licenses to deploy its network in the Greater Washington, D.C. metropolitan area. T-Mobile currently has (15) panel antennas, (1) multi-beam antenna, and (21) remote radio heads (RRHs) in an existing array on four sectors of the rooftop at the Humphrey Building. T-Mobile proposes to upgrade this array by removing (2) antennas and installing (2) antennas.

Sector 1 (northeast corner):

- Remove (1) existing LAA antenna
- Install (1) new antenna on a ballasted overhang flush-mounted near the roof's edge

Sectors 2 (south) and 3 (west):

- No changes

Sector 4 (north):

- Remove (1) existing LAA antenna
- Install (1) new antenna on a ballasted overhang flush-mounted near the roof's edge

Sectors 1 and 4 both overlook Independence Avenue SW. See Figure 1 and Figure 2 for siting details.

There would be no net increases to the antenna count. Proposed antennas would be installed flush with roof and would be painted to match the building's façade.

Figure 1. Existing Conditions, Sectors 1 & 4 (Independence Avenue view)



Figure 2. Proposed Conditions, Sectors 1 & 4 (Independence Avenue view)



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.

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 Maps (Map number: 1100010019C, effective date 09/27/2010, Letter of Map Revision (LOMR) 15-03-2388P, effective date 09/14/2016), the Humphrey Building is within a defined Special Flood Hazard Area (SFHA). 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 Humphrey Building was in the National Register of Historic Places (NRHP) on September 12, 2024. The proposed antenna installation is consistent with previously approved installations and will follow approved protocols or minimal visibility. For these reasons, GSA determined that the proposed T-Mobile upgrades will have no adverse effect on the subject building or 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: Although the Humphrey Building is currently listed on the NRHP, proposed antenna installation is consistent with previously approved installations and will follow approved protocols or minimal visibility. Therefore, 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 Bat (*Myotis septentrionalis*), the proposed endangered Tricolored Bat (*Preimysotis subflavus*), or the candidate monarch butterfly (*Danaus plexippus*) as the existing project site does not contain the appropriate habitat requirements for this species; any potential occurrence within the project site would be transient. The project site is not within or adjacent to a wetland. While the project site is within a regulatory floodplain, the site is urban with previously disturbed ground; it is unlikely to provide the ecosystem benefits associated with a floodplain. 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 project site is within a corridor of Federal agencies, museums, and near to the National Mall, which would be occupied during the both the weekday and weekends. The immediate area does not include residential buildings.

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 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.