

**National Telecommunications and Information Administration
Broadband Technology Opportunities Program
Finding of No Significant Impact
Northwest Open Access Network
Washington Rural Access Project – Round II**

Summary

Northwest Open Access Network (NoaNet) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to install microwave antennas on 65 existing structures and construct approximately 489 miles of fiber optic cable. While the new network will be a hybrid of aerial and buried fiber, most of the fiber will be installed aerially on existing utility poles. Where existing utility poles are not available, the fiber will be buried underground within existing rights-of-way (ROWs), by vibratory plowing and directional boring techniques. A portion of the fiber may be attached to bridges or installed on replacement poles, as required. The new fiber network will provide broadband service to community anchor institutions (CAIs), including libraries, public schools, health care providers, public safety facilities, tribal centers, and other anchor institutions. The proposed action will connect 15 counties across the State of Washington, and is referred to as the Washington Rural Access Project – Round II (Project).

The National Telecommunications and Information Administration (NTIA) awarded this grant through BTOP, as part of the American Recovery and Reinvestment Act (ARRA). The funding must be obligated and the Project completed within three years. This timeline will comply with the laws and regulations governing the use of this ARRA grant funding.

BTOP supports the deployment of broadband infrastructure in unserved and underserved areas of the United States and its Territories. As a condition of receiving BTOP grant funding, recipients must comply with all relevant Federal legislation, including the National Environmental Policy Act of 1969 (NEPA). Specifically, NEPA limits the types of actions that the grantee can initiate prior to completing required environmental reviews. Some actions may be categorically excluded from further NEPA analyses based on the specific types and scope of work to be conducted. For projects that are not categorically excluded from further environmental review, the grant recipient must prepare an Environmental Assessment (EA) that meets the requirements of NEPA. After a sufficiency review, NTIA may adopt the EA, use it as the basis for finding that the project will not have a significant impact on the environment, and issue a finding of no significant impact (FONSI). Following such a finding, the BTOP grant recipient may then begin construction or other activities identified in the EA as the preferred alternative, in accordance with any special protocols or identified environmental protection measures.

NoaNet completed an EA for this Project in October 2011. NTIA reviewed the EA, determined it is sufficient, and adopted it as part of the development of this FONSI.

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The Project includes:

- Installing a hybrid broadband network of aerial and buried fiber, with associated handholes and vaults, in existing ROWs throughout 15 counties within the State of Washington;
- Installing approximately 162 miles of buried fiber optic cable fiber in existing, previously disturbed ROWs by plowing or directional boring;
- Installing approximately 327 miles of aerial fiber on existing utility poles;
- Installing new microwave antennas on 65 existing towers and structures across the planned service area;
- Attaching fiber to bridges within new or existing conduit; and
- Providing direct connection to 285 CAIs, including educational, emergency services, and healthcare facilities throughout the area.

Based on a review of the analysis in the EA, NTIA has determined that the Project, implemented in accordance with the preferred alternative, and incorporating best management practices (BMPs) and protective measures identified in the EA, will not result in any significant environmental impacts. Therefore, the preparation of an EIS is not required. The basis for this determination is described in this FONSI.

Additional information and copies of the Executive Summary of the EA and FONSI are available to all interested persons and the public through the BTOP website (www2.ntia.doc.gov/) and the following contact:

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Purpose and Need

The purpose of this Project is to bring enhanced, affordable broadband service to unserved and underserved communities within the State of Washington. Current broadband service in the area is inadequate or unaffordable for many residents and institutions, particularly those outside the heavily populated Interstate 5 corridor. The planned Project will improve broadband service and internet access for education, healthcare, public safety, and other CAIs Statewide. The Project will provide connectivity for 285 CAIs, including schools, libraries, hospitals, medical clinics, and tribal centers.

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Project Description

NoaNet will install 162 miles of buried fiber, 327 miles of aerial fiber, and wireless telecommunications equipment on 65 existing towers and structures. The new open network will provide broadband service to critical community facilities along 12 separate routes throughout 15 counties in rural northwestern, northeastern, and southern Washington State. Construction will occur within existing ROWs along U.S. and State highways, county roads, and city streets; through tribal lands; and within Federal land managed by the U.S. Department of Agriculture-Forest Service (USDA-FS), the Department of the Interior (DOI) Bureau of Land Management (BLM), and the Department of Defense (DoD).

The majority of the fiber will be installed aurally along the Project route, primarily on existing utility poles using the stranding or lashing technique. This method involves attaching a cable to the poles and lashing the new fiber cable to the existing strand. Existing poles will be replaced where necessary to accommodate the new fiber. Typically, NoaNet will insert the replacement pole in the existing utility pole location. However, if required, a replacement pole may be installed within 1 foot of the existing pole. To install replacement poles, a hole approximately 5 feet deep is drilled, the base of the pole is inserted, the excavated soil is compacted back into the hole to stabilize the pole, and the ground surface is restored to its original condition. With the exception of replacement poles, no new poles will be installed along the Project route. Where existing poles are not available, fiber will be installed primarily via plowing or directional boring, with limited trenching. Approximately 162 miles of fiber will be installed 36-inches underground in existing ROWs primarily by plowing. The vibrating plow pulls a metal blade through the subsurface, creating a trench 2 to 3 inches wide. The conduit and fiber are installed, and the trench is backfilled with excavated soil.

Fiber optic cable will be installed across streams and rivers by either routing the cable through new or existing conduit attached to bridges, aerial installation on existing poles, or using directional boring techniques. Directional boring will be used to avoid selected sensitive ecological resources (e.g., wetlands, streams, and rivers) and associated buffer zones, archaeological and/or historically significant sites, as well as construction-limited areas, such as roadways and sidewalks. The directional boring method involves excavating pits at the cable entry and exit points, drilling a horizontal cable pathway between the points, installing conduit, and pulling the cable back through the conduit. Directional boring will be initiated a minimum of 60 feet away from the water feature or sensitive resource, and the depth of the boring will be 10 feet below the streambed or no less than 2 feet for other resources. The need for directional boring will be determined during the Project's final design phase.

Trenching will be used only in situations where plow or directional boring machines do not have adequate access to complete underground construction. The trench method uses heavy equipment excavators or hand digging to create the trench and backfill with excavated soil. CAIs will be connected to the new network via underground fiber to be installed using plowing

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or directional boring methods. Fiber will be routed into CAI buildings through a new 1.25-inch hole penetrating the facility wall. NoaNet will construct new equipment cabinets in previously disturbed areas at select locations along the Project route. The largest cabinets will measure approximately 4 feet long by 2 feet wide by 5 feet high. In rural areas, cabinetry may also be mounted on utility poles. All cabinets will be installed in accordance with local permit requirements and easements.

NoaNet will construct buried and aerial fiber across lands managed by the USDA-FS, BLM, and DoD, and through portions of the Nooksack, Upper Skagit, Kalispel, Port Madison (Suquamish Tribe), and Yakama Indian Reservations. Fiber installation on these lands will be on existing utility poles or buried in existing ROWs. No new road construction will be needed to install or access the fiber optic cable. Specifically, NoaNet will install approximately 30 miles of buried and aerial fiber through portions of the Colville National Forest and Okanogan - Wenatchee National Forest along Routes NE-1 and NE-2 managed by the USDA-FS. Approximately 2 miles of fiber will be installed adjacent to land managed by the BLM Spokane and Wenatchee Districts, which will require crossing permits issued by BLM. Approximately 37 miles of buried and aerial fiber will also be installed through portions of the Nooksack, Upper Skagit, Kalispel, Port Madison (Suquamish Tribe), and Yakama Indian Reservations. A portion of Route NW-2 will include aerial installation on existing poles, within an existing ROW on Indian Island, which is managed by the DoD.

Wireless telecommunications infrastructure will be installed on 65 existing towers, buildings, and street lampposts along Routes NW-1A, NW-2, and NE-3. Six of these towers sites meet the criteria for collocation of antennas on towers constructed after March 16, 2001, as identified in the *Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*. NoaNet will be required to file the appropriate Federal Communications Commission (FCC) Form 621 to record the collocation of licensed band services on these previously constructed towers.

Alternatives

The EA includes an analysis of the alternatives for implementing the Project to meet the purpose and need. NTIA also requires that an EA include a discussion of the no action alternative. The following summarizes the alternatives analyzed in the EA.

Alternative 1 – Hybrid Fiber and Wireless Network Technologies (Preferred Alternative). This alternative involves installing 490 miles of new fiber optic cable and collocating new microwave antennas on 65 existing towers and structures along 12 routes for the Project. Most of the new fiber optic cable will be installed aerially on existing utility poles. Underground fiber will be installed in previously disturbed ROWs when existing utility poles are not available. Wireless technology will be used in remote and rural areas where cable placement is not feasible.

No Action Alternative. No action was also considered. This alternative represents conditions as they currently exist in the Project area. Under the no action alternative, no new fiber-based or

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wireless infrastructure would be installed. As a result, the Project would not meet its intended purpose, including providing enhanced broadband access to rural communities in the region. The EA examined this alternative as the baseline for evaluating impacts relative to other alternatives being considered.

Alternatives Considered But Not Carried Forward. In addition to the preferred alternative, NoaNet considered limiting broadband connections to a single type of technology (i.e., using either fiber optic cable or wireless technology, but not both) or a single installation type (i.e., underground or aerial installation, but not both). These options were determined to be infeasible or impracticable. Limiting the network to wireless technology would not meet the goals of the Project, as wireless technology is unable to provide the bandwidths and internet speeds available with fiber optic cable. Due to rough terrain and other considerations, limiting the Project to fiber optic cable infrastructure would significantly increase the length of fiber required, as well as the complexity of and time required for installation. Use of aerial installation as the primary Project component was deemed infeasible due to the susceptibility to damage from severe weather and the need to install additional utility poles in areas where they currently do not exist. A majority of the Project route has been identified for the installation of fiber on existing poles; therefore, the all-underground alternative would not meet the goals of the Project within the timeframe provided. Based on these assessments, only the preferred and no action alternatives were retained for full evaluation in the EA.

Findings and Conclusions

The EA analyzed existing conditions and environmental consequences of the preferred alternative and the no action alternative in 11 major resource areas, including Noise, Air Quality, Geology and Soils, Water Resources, Biological Resources, Historic and Cultural Resources, Aesthetic and Visual Resources, Land Use and Recreation, Infrastructure, Socioeconomic Resources, and Human Health and Safety. Cumulative impacts were also evaluated.

Noise

This Project will have short-term impacts on noise. Use of heavy equipment during the construction phase will result in short-term, temporary increases in ambient noise. However, it is unlikely that construction equipment will be near sensitive noise receptors for more than one to two days. Nevertheless, some noise impact near sensitive receptors is unavoidable because many of the entities to be served by the new network are themselves sensitive receptors (e.g., schools and libraries). NoaNet will comply with local and State noise ordinances to keep noise impacts to a minimum. Operation of the network will not increase long-term ambient noise levels. Based on these assessments, no significant noise impacts are expected to occur as a result of this Project.

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Air Quality

During the construction phase of the Project, emissions will be generated by construction equipment, including vibratory plows and directional drilling equipment. Emissions from this construction equipment will be temporary, minor, and transitory as construction activities move along the installation route. Negligible fugitive dust emissions will also be generated during construction operations. NoaNet will implement BMPs to limit fugitive dust emissions, including applying water to suppress dust, preventing the burning of debris or vegetative material, and properly maintaining construction equipment. The Project will also result in short-term, minor increases in the use of fossil fuel and associated greenhouse (GHG) emissions during construction. Considering the nature and scope of the planned network expansion, NoaNet estimates that the Project will result in the release of approximately 1,307 metric tons of carbon dioxide equivalent emissions. Thus, GHG emissions are expected to be well under the Council on Environmental Quality's presumptive effects threshold of 25,000 metric tons of carbon dioxide equivalent emissions from an action. NoaNet will limit GHG emissions by using modern construction equipment and prohibiting excessive idling of equipment when not in use, in accordance with Federal guidance and policies. Neither the placement nor operation of the buried fiber optic cable and wireless infrastructure will create any new, long-term sources of air emissions in the Project area. Based on implementation of BMPs, construction of the planned network is not expected to have significant adverse impacts on air quality.

Geology and Soils

Under this Project, fiber optic lines will be installed in previously disturbed ROWs along roadways, and utility and railroad easements. Construction using a vibratory plow or directional drilling will preserve existing soils profiles and will not adversely affect the geology or soils of the area. Areas requiring trenching will be backfilled with soils from the area of excavation and restored to their original condition. Installing fiber on utility poles should have negligible impacts on geology and soil. BMPs will be implemented to prevent sedimentation and erosion impacts on the Project area. These BMPs may include temporary/permanent seeding, mulching, and straw bales. Based on these assessments, the Project is not expected to result in significant adverse impacts on the geology or soil in the area.

Water Resources

Project construction activities are not expected to impact to water resources. Although the fiber route intersects several streams and rivers, as well as adjacent wetlands, impacts to water resources will be avoided by installing the cable aerially on existing poles, burying the cable within the shoulders of existing ROWs, installing the fiber using directional boring, or routing the cable through new or existing conduit currently attached to bridges. After consulting with the U.S. Army Corps of Engineers (USACE), NoaNet confirmed that permits are not required for directional boring or aerial installation of fiber, and installation of fiber via vibratory plow is permitted under USACE Nationwide Permit (NWP) 12 for Utility Line Activities.

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NoaNet will install a majority of the new fiber aerially on existing poles. For underground installation, the fiber will be placed via directional boring at a minimum of three feet below the surface, and will not result in substantial fills or other grading revisions within floodplains. There is the potential for a temporary increase in stormwater discharge during construction. However, NoaNet will implement BMPs to minimize erosion, sedimentation, and turbidity in receiving waters.

In addition, fiber will be placed primarily along roads within existing roadway ROWs and installed at a shallow depth (approximately three feet). Significant groundwater aquifers are not present at such limited depths and therefore will not be impeded by installation of the new network. Therefore, no significant direct or indirect impacts to groundwater resources are anticipated.

Specifically, the Project route will cross four navigable waterways. The Columbia River, Snohomish River, and Yakima River will be crossed aerially on existing poles. NoaNet will install fiber through new or existing conduit attached to the Flager Road Bridge to cross over the saltwater channel that connects Oak Bay and Port Townsend Bay. NoaNet has alerted the U.S. Army Corps of Engineers (USACE), Seattle District, of all planned water crossings and is consulting with this office to obtain applicable Section 404 permits for all river and stream crossings.

In a letter dated March 10, 2011, the USACE confirmed that the Project would cross Section 10 navigable waters. Based on the construction methods provided by NoaNet, the USACE confirmed that the proposed navigable water crossings should qualify for authorization under NWP 12, and therefore requires further coordination and a Department of the Army permit. State and local permits will also be required for work within the Coastal Zone in Jefferson County, specifically within Fort Flager State Park. NoaNet will follow the requirements outlined in the Jefferson County Shoreline Management Plan and Coastal Zone Management Plan for Project activities.

NoaNet will implement appropriate BMPs to reduce potential impacts on surface waters in accordance with county, USACE, Washington State Department of Transportation (WSDOT), US Fish and Wildlife Service (USFWS), and USDA-FS requirements. By avoiding construction through waterways and implementing erosion and sediment control BMPs, NoaNet will be able to construct the network with no significant adverse impacts on water resources.

Biological Resources

Based on information provided by the U.S. Fish and Wildlife Service (USFWS), the USDA-FS, the National Marine Fisheries Service (NMFS), Washington Department of Ecology, and Washington State Department of Fish and Wildlife (WSDFW), 28 threatened or endangered species were identified in the Project area. However, after further review and additional field reconnaissance along buried portions of the Project within a National Forest, NoaNet determined

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that suitable habitat for only one species of interest is present near the Project route and subject to potential disturbance. Final project alignment and design will include consideration of avoidance measures to protect the single plant species of interest that was identified.

NoaNet will follow permitting and regulatory requirements of the USFWS, USDA-FS, NMFS, and WSDFW for all Project activities. Based on previous conversations with USFWS regarding NoaNet's Round I Project (documented in an email from USFWS dated August 30, 2010) and with the implementation of recommended BMPs and avoidance measures, the Project is not likely to adversely affect threatened and endangered species. NoaNet will continue coordination with the USFWS prior to construction activities for any areas with the potential to disrupt wildlife and associated habitat. Specifically, NoaNet will work with the USFWS regarding fiber installation adjacent to the Umatilla National Wildlife Refuge along the southwest portion of Route SC-6 near Patterson, Toppenish National Wildlife Refuge, and Little Pend Oreille National Wildlife Refuge.

NoaNet consulted with the USDA-FS regarding potential impact to listed or sensitive species along the Project route in the Colville and Wenatchee National Forests. NoaNet met with the USDA-FS on April 26 and July 11, 2011 to discuss construction activities, BMPs, and potential endangered, threatened, and sensitive species that may be encountered. USDA-FS provided a species list for the Colville National Forest and recommended specific BMPs for the National Forest(s). USDA-FS representatives have confirmed that no effect is anticipated for endangered or sensitive species along Routes NE-1 and NE-2 and that based on information to date, formal consultation under Section 7 of the Endangered Species Act will not be required. Ongoing coordination between NoaNet and USDA-FS during the Special Use permitting process will ensure impacts on endangered species and critical habitats are avoided.

In addition to considering potential impacts on listed species, NoaNet evaluated potential impacts on migratory birds and other wildlife. To reduce the potential impacts on avian species protected under the Endangered Species Act, Bald and Golden Eagle Protection Act, and the Migratory Bird Treaty Act, new antennas will be collocated on existing structures, towers, or buildings. For collocation wireless sites, the new wireless antenna will not increase the height of the structure. Therefore, no significant impacts will occur to migratory birds or other wildlife species.

Based on this analysis and implementation of the recommended protective measures, NoaNet will be able to construct the fiber network with no significant adverse impacts on biological resources.

Historic and Cultural Resources

In November 2010, NTIA initiated consultation with the Washington Department of Archaeology and Historic Preservation (State Historic Preservation Office [SHPO]). In this correspondence, NTIA notified the SHPO that the Project includes telecommunication facilities

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licensed by the FCC and subject to the *Program Comment for Streamlining Section 106 Review for wireless Communication Facilities Construction and Modification Subject to Review Under the FCC Nationwide Programmatic Agreement (FCC NPA) and/or the Nationwide Programmatic Agreement for the Co-location of Wireless Antennas*, issued on November 25, 2009. NoaNet will be installing wireless telecommunications equipment using FCC licensed spectrum on 65 existing towers and structures; consequently, these 65 collocation sites fall under the FCC NPA. NTIA also provided the SHPO with a project description and associated maps of the Project area.

In a letter dated November 22, 2010, the SHPO provided concurrence with the proposed Area of Potential Effect (APE) and requested ongoing consultation to identify cultural resources and evaluate effects. Based on the Programmatic Agreement governing BTOP, aerial fiber on existing poles is exempt from Section 106 review, so consultation is required only for newly buried fiber, pole replacements, or other ground disturbing activities.

Following the SHPO response letter, NoaNet engaged Tierra Right of Way Services, Ltd. (Tierra) to identify archaeological and architectural resources within the Project's APE. Tierra conducted a records check for each of the four Project regions (NC, NE, NW, SC), and identified 42 archaeological sites, 8 cemeteries, 32 historic properties, 10 buildings on the National Register of Historic Places, and 2 Historic Districts within the APE for routes in the NTIA consultation.

On January 6, 2011, NTIA also initiated consultations with six Tribal Historic Preservation Officers (THPOs) for direct impacts anticipated on the Nooksack, the Tulalip, the Kalispell, the Suquamish (Port Madison), the Yakama, and the Upper Skagit reservations.

Four separate regional cultural resources reports were subsequently developed to clarify the Project description and identify known cultural resources in the APE for the routes. Routes recommended as culturally sensitive will require further analysis post-staking, and the reports include a treatment plan template. Ten of the 12 fiber routes have also been recommended for further treatment, which include NC-2, NC-3, NE-1, NE-2, NE-3, NW-1A, NW-2, SC-2A, SC-5, and SC-6. Tierra also determined that 6 out of the 65 collocation sites would require Section 106 review under the FCC NPA.

As stated in the cultural resources reports, once final staking is completed, NoaNet's archaeological consultant(s) will determine the necessary further steps to identify and treat cultural resources in the APE. These steps will include qualified archaeologists reviewing whether new field surveys are warranted in culturally sensitive areas, and field verifying the location of previously identified sites/properties relative to the project to assess which sites can be avoided (i.e. through boring, re-staking, or use of aerial cable), and which areas may require monitoring.

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NTIA, SHPO, and consulting tribes approved a template for route monitoring plans during the NoaNet Wrap I project. NoaNet will consult with these parties to customize the template to the specific (culturally sensitive) Wrap II route in question. Each individual plan will identify the parties in consultation, establish communication protocols, and review the resources specific to the route. The individual monitoring plans for each route will establish the requirements that NoaNet commits to implement in order to avoid adverse effects. All consulting parties and tribes will receive the plans prior to the start of construction. NTIA will review the plans, and provide NoaNet with transmittal letters for the SHPO and concerned tribes. Tribes may coordinate with NoaNet's archaeological project manager to request that their own monitors be present during construction. NoaNet will advise NTIA immediately of such a request, and alert the Federal Program Officer in the event that any associated issue arises in the field. Once fieldwork is completed, results of all avoidance and monitoring activities will be documented in a final report for submittal to NTIA, SHPO, and any consulting tribes or parties.

In a letter dated February 24, 2011, NTIA transmitted the regional reports to the SHPO, BLM, USDA-FS, and Tribal Historic Preservation Officers (THPOs) for the Nooksack, the Kalispel, the Suquamish (Port Madison), the Yakama, and the Upper Skagit tribes. NTIA requested concurrence on the findings and the determination that the Project will have No Adverse Effect on Historic Properties, provided that NoaNet commits to implement the recommended treatments.

A consultation package was also sent to the Confederated Tribes of the Umatilla Indian Reservation, as they so requested in responding to the TCNS notification. NTIA concurrently advised the Tulalip THPO that changes to the project had eliminated any potential for associated impacts to the reservation.

In correspondence dated March 2, 2011, the SHPO concurred that the Project should have No Adverse Effect to Historic Properties (exclusive of the elements under the jurisdiction of the THPOs) provided that treatment plans for culturally sensitive routes are developed and implemented.

On April 7, 2011, NTIA sent follow up emails to the THPOs in consultation, requesting their confirmation of report receipt and any comments on the findings.

The Nooksack Tribe concluded in an email dated April 27, 2011 that they have no concern with the Project. However, they requested notification in the event that archaeological remains or resources are discovered.

In an email response, the Suquamish Tribe confirmed that they have no further interest in the Project. However, the Tribe requested that they be notified in the event that archaeological remains or resources are discovered.

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In a response letter dated April 19, 2011, the Kalispel Tribe of Indians concurred with a determination of no adverse effect, but only for the section (NE-2: Ione to Jared Road) located on their ceded lands. This concurrence is based on the condition that the project description does not change prior to implementation. If changes are deemed necessary, such as installing a new utility pole or reinforcing guy wires, a qualified cultural resource professional will be required to conduct an on the ground assessment to determine the potential presence of historical properties. That assessment shall be provided to all consulting parties for their review and concurrence.

An additional copy of the cultural resources report was provided to the Upper Skagit Indian Tribe on May 2, 2011. As of September 2, 2011, no comments have been received from the Upper Skagit Indian Tribe.

In a letter dated April 26, 2011, the Yakama Nation identified several concerns regarding the cultural research reports for Routes SC-2A, SC-5, and SC-6 and did not concur with the 'No Adverse Effect' recommendation. Consequently, the tribe requested that the Yakama Nation Cultural Resource Program conduct a pedestrian survey of the APE to identify any previously undiscovered resources and/or isolates. In a memo dated August 10, 2011, the Yakama Nation concurred with a finding of No Adverse Effect provided that the Tribe assesses, surveys, monitors, and protects any tribal cultural properties prior to construction on the Yakama Reservation.

The Confederated Tribes of the Umatilla Indian Reservation (CTUIR) have indicated their potential concern over route SC-6 in Benton County. NoaNet and NTIA will include the CTUIR in consultation on the development of the treatment plan for this route, and construction will not occur until their concerns are addressed.

NoaNet will continue working with the BLM and USDA-FS on Section 106 requirements associated with the agencies' permitting processes. No construction work will begin on BLM or USDA-FS lands until all appropriate archaeological permits have been received, reviews completed, and concurrences received.

In addition to the direct THPO consultations previously described, NTIA provided notification of the project to 26 Native American Tribes through the Federal Communication Commission's Tower Construction Notification System (TCNS) on November 26, 2010. Seven Tribes did not respond within 30 days after the TCNS notification, thereby indicating no interest in the Project.

Twelve Tribes responded (via letter or email) that they have no interest in the Project, but requested notification in the event of unanticipated discoveries. The Confederated Tribes of the Umatilla Indian Reservation requested a copy of the cultural resource reports. The Coeur d'Alene (CDA) THPO responded on behalf of the Tribal Council to the TCNS notification for NoaNet Wrap II in December 2010, indicating unresolved concerns regarding NoaNet's Round I Project. NTIA met with the THPO at the CDA reservation in April 2011 to resolve Round I

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issues, and NoaNet supplemented associated cultural resource efforts to address CDA's concerns. In a letter to the THPO dated September 23, 2011, Tierra provided the CDA THPO with the project timeline for Wrap II, and stated that they will provide copies of the records review reports once the final routes are staked and work to resolve any concerns as in Round I. Consultations with the Confederated Tribes of the Umatilla Indian Reservation and Coeur d'Alene Tribal Council are still ongoing and construction will not occur in these areas until resolution is achieved and documented in a specific Historic Properties Treatment Plan.

If Project construction activities uncover cultural materials (e.g., structural remains, historic artifacts, or prehistoric artifacts), NoaNet will stop all construction work and immediately notify interested Tribal Nations, the SHPO, and NTIA. If earth-disturbing activities uncover human remains, all work will cease immediately, in accordance with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) and relevant State statutes. The area around the discovery will be secured and appropriate law enforcement personnel and NTIA will be notified immediately.

Based on the results of consultations, the Project is not expected to have significant adverse impacts on historic and cultural resources, provided that NoaNet develop and implement treatment plans for ten culturally sensitive project segments.

Aesthetic and Visual Resources

The Project will involve construction adjacent to agricultural fields, natural areas, and urban streetscapes. Aesthetic disruption in most areas will be limited to the short-term presence of construction equipment. Permanent aesthetic impacts will be limited because the new wireless equipment will not increase the height of collocation sites and the new cabinets are small structures located within existing ROWs. For aerial fiber installation, NoaNet will use existing utility poles to avoid creating new visual impacts.

NoaNet will continue working with the USDA-FS for Routes NE-1 and NE-2, and the BLM, as applicable, to determine the potential for visual resource impacts on Federally managed lands. Based on the analysis and consultation, the Project is not expected to have a significant adverse impact on aesthetic and visual resources in the Project area.

Land Use

Fiber will be installed in previously disturbed ROWs. There will be no change in the existing land use due to the underground fiber installation, the addition of new fiber on existing poles, or the placement of new wireless collocation equipment. The Natural Resource Conservation Service (NRCS) has confirmed that the Project "will not be irreversibly converting prime and unique farmland or farmland of statewide importance to nonagricultural use."

Public Scoping Notices have been filed by the USDA-FS for the segments of the project that cross the Colville and Wenatchee National Forests. Through the Special Use permitting process,

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USDA-FS, BLM, and DoD will analyze potential land use impacts and determine whether the Project is consistent with their respective land and resource management plans. NoaNet has agreed to comply with all permit conditions issued by the respective Federal agencies. NoaNet will also obtain the necessary permits from the State Departments of Natural Resources and Transportation concerning State owned lands. NoaNet is also working with Ferry County Public Utility District (PUD), as advised by the USDA-FS, to ensure that existing PUD utility poles can be used, where appropriate, through forestland. Per BLM comments, NoaNet will also be required to obtain written approval from Benton County PUD, Franklin County PUD, Pend Oreille PUD, and Wahkiakum PUD stating that each entity agrees to obtain and operate the ROW for the fiber route. Based on these consultations, the Project will have no significant adverse impact on land use.

Infrastructure

Various levels of infrastructure services (e.g., roadways, telephone lines, natural gas, and electric lines) are in place throughout the Project area. The Project's fiber route will be attached primarily to existing utility poles or buried in existing ROWs. A portion of the SC-6 fiber route will be within the Burlington Northern Santa Fe (BNSF) Railroad ROW. There will be minor, short-term construction impacts on roadways and traffic flow during fiber installation. NoaNet will implement traffic control measures that will follow an approved traffic plan from WSDOT and city right-of-way permits. New antennas will be installed on existing towers, buildings, and other structures in accordance with FCC guidelines and standard telecommunications construction practices. The new network will provide a secure, high-speed wireless data network for these 15 Washington counties. Overall, this Project is expected to have a positive impact on infrastructure, and is not anticipated to result in significant adverse impacts on infrastructure.

Socioeconomic Resources

The Project will provide enhanced broadband access to users throughout 15 counties in northwestern, northeastern, and southern Washington State, particularly within rural and remote parts of the region. Implementation of the Project will provide enhanced broadband services to rural schools, libraries, and medical facilities, including Tribal centers. In rural, low income, and Tribal locations, the enhanced bandwidth will have a positive impact on education, economic opportunities, health care, and public safety. The network will provide the surrounding communities with improved access to educational resources and job training, and comprehensive health services. The Project will not disproportionately affect minority and low-income populations. Overall, this Project is expected to have a positive impact on socioeconomics in the planned service area.

Human Health and Safety

Several hazardous waste sites have been identified within or near the Project area. However, fiber will be buried in conduit approximately 3-feet deep in previously disturbed ROWs. Therefore, no impacts are anticipated along the fiber route. Nevertheless, if contaminated soils

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are unexpectedly encountered during construction, work will cease in the area of concern and the appropriate State and local authorities will be contacted.

Human health and safety concerns may arise during construction when such activities occur in close proximity to traffic along roadways. However, because construction activities will occur in ditches and utility corridors along highways and roads, contractors will not be directly in the path of traffic. BMPs for workplace safety will be implemented to protect workers and the public along the Project route. Contractors will be required to develop and implement a detailed Traffic Safety Plan in accordance with local permits and construction requirements. Contractors will comply with Federal Highway Administration requirements and the Manual on Uniform Traffic Control Devices to promote highway safety and efficiency by providing warning and guidance to all elements of traffic. WSDOT traffic control standards will be used to establish and maintain a safe work zone. Workers are required to meet Occupational Safety and Health Administration (OSHA) standards. With implementation of these protection measures, the Project will not generate any significant adverse worker or traffic-related health or safety issues. In addition, the Project is not expected to have direct impacts on human health and safety during normal operation.

Cumulative Impacts

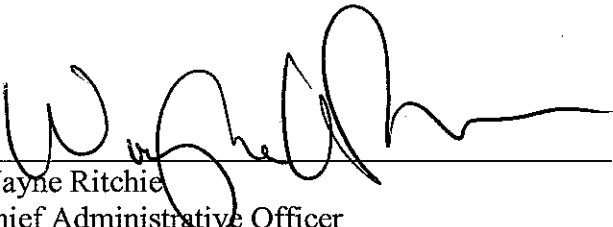
As described above, the Project will not have significant adverse impacts on any of the environmental resource areas evaluated in the EA. With Project construction occurring along existing ROWs, there is potential for overlap between the planned installation and future improvements. NoaNet will work with other utilities, Federal, State and local governments, and tribal entities to coordinate scheduling details to avoid construction conflicts, including traffic safety and access issues. As such, no cumulative impacts on the environment are anticipated.

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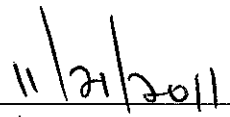
Decision

Based on the above analysis, NTIA concludes that constructing and operating the Project as defined by the preferred alternative, identified BMPs, and protective measures, will not require additional mitigation. A separate mitigation plan is not required for the Project. The analyses indicate that the proposed action is not a major Federal action that will significantly affect the quality of the human environment. NTIA has determined that preparation of an EIS is not required.

Issued:



Wayne Ritchie
Chief Administrative Officer
Office of Telecommunications and Information Applications
National Telecommunications and Information Administration



Date