

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

REVISED – JULY 2012

Summary

The revised Finding of No Significant Impact (FONSI) is being reissued by NTIA to reflect minor project changes that were documented and analyzed in supplemental Environmental Assessment (EA) documentation. This FONSI is effective as of July 26, 2012, and supersedes the original FONSI issued September 30, 2010.

The Northwest Open Access Network (NoaNet) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to provide an estimated 930 miles of new fiber optic cable infrastructure across the State of Washington. This new infrastructure will extend and expand NoaNet's existing open access high-speed network, enhance education and health care accessibility, and create opportunities for economic development within the planned service area. The proposed action will primarily serve rural communities that are currently unserved or underserved and is referred to as the Washington Rural Access Project, or WRAP (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 September 2010 and supplemental EA documentation was provided in June 2012 for minor Project changes. NTIA reviewed the

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original EA and supplemental documentation, determined it is sufficient, and adopted it as part of the development of this revised FONSI, which is effective as of July 26, 2012.

The Project includes:

- Expanding the existing NoaNet broadband service network by installing approximately 930 miles of aerial and buried fiber optic cable along 19 separate routes across the State of Washington;
- Using plowing and directional boring techniques to install underground cable, constituting approximately 64% of the planned network;
- Installing aerial cable on existing utility poles to establish 36% of the planned network;
- Using a combination of hydro-plow insertion, directional boring, and open trenching to install approximately 9 miles of cable across Willapa Bay;
- Installing a new microwave tower, one support building, three equipment shelters, backup power generators, and microwave antennas at various locations around the planned network to support wireless routing over a portion of the service area;
- Installing exterior equipment cabinets, buried vaults, and hand holes as necessary to facilitate effective network installation, operation, and maintenance; and
- Installing cable underground and/or aerially to directly connect targeted anchor institutions within the network service 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:

Frank J. Monteferrante, Ph.D.
Environmental Compliance Specialist
Broadband Technology Opportunities Program
National Telecommunications and Information Administration
U.S. Department of Commerce
Room 2510
1401 Constitution Avenue, NW
Washington, DC 20230
Tel. 202-482-4208

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Fax 202-501-8009

Email: FMonteferrante@doc.gov

Purpose and Need

The purpose of this Project is to expand NoaNet's existing open access high-speed network, and serve Washington communities that are currently unserved or underserved. The rural, unserved, and underserved populations within the planned service area have higher unemployment and under-employment rates than the national averages. An estimated 11% of the population in the targeted service area has no access to broadband. The network will deliver new and enhanced broadband capabilities to these vulnerable populations, bringing fiber optics to 123 anchor institutions in 20 counties across the State, and passing more than 125,000 residents in rural areas. The Project will bring advanced capabilities to libraries, key medical centers and clinics, community colleges, and government facilities. The result will be expanded health, education, public access, and networking opportunities to residents of rural areas that rely predominantly on agriculture and tourism and are especially vulnerable due to the recent global economic decline.

Project Description

The Project involves installation of approximately 930 miles of fiber optic cable, microwave wireless transmission equipment, and ancillary infrastructure such as vaults, hand holes, cabinetry, and small storage structures across 6 separate regions and 20 counties in Washington. A combination of underground installation, aerial cable, and wireless technology is planned for the WRAP network. This Project also includes direct connection of targeted community anchor institutions throughout Washington State, as indicated in the BTOP grant.

Approximately 588 miles of the fiber optic cable network (64% of the total) will be installed as underground infrastructure. A combination of plowing and directional boring will be used for underground cable and conduit installation. Wherever possible, underground installations will be located in previously disturbed ground adjacent to the paved roadway shoulder, in ditches, and/or along fence lines within public rights-of-way (ROW). Utility easement corridors will be used in limited cases, but have generally been avoided during preliminary layout and conceptual design of the Project. In two locations, NoaNet will obtain easements to take the network across private property.

Plowing techniques will be the primary method for installing underground network infrastructure. Plowing is a minimally invasive construction technique that does not require a substantial amount of soil excavation. The shear slices into the earth to allow for installation of the conduit or cable at a minimum depth of 36 inches below ground surface. Once the conduit or cable is in place, the plow slot is refilled and compacted with native soil. This method of installation has minimal impact on the landscape, and imported backfill is

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not required. In some instances, where rock is encountered and unavoidable, a rock saw may be used to facilitate installation. Directional boring techniques may be used to accommodate stream, creek, river, and culvert crossings and other features that prohibit use of the plow method of installation.

Directional boring techniques will be used to traverse areas of potential environmental and archaeological concern whenever they are needed to comply with specific permit requirements. These techniques will also be used in situations with limited access for the plow, and as needed to minimize impacts on urban features (e.g., sidewalks and streets). Directional boring activities for this Project will not require boring pits. Either method of underground fiber installation may be used when installing cable laterals to directly connected network buildings. At the end of the lateral conduit, a small ground-level hand hole will be installed near the building. Riser cable from this hand hole will be routed to a junction box, through a hole drilled into the building exterior, and into a designated communications center within the building.

Aerial installation is preferred for some portions of the Project and is expected to constitute approximately 333 miles, or 36% of the total Project cable. New all-dielectric self-support (ADSS) fiber optic cable will be installed on existing utility poles; no new poles are proposed. Nevertheless, if required, pole replacement will be accomplished without the use of pile drivers. New poles will be inserted and secured in existing utility pole holes or placed within one foot of the existing pole by auguring and inserting the pole. The area around the pole will be filled with dirt from auguring and the ground surface restored to original conditions. When poles are within a 40-foot distance from the shoulder of the road, the fiber optic cable will be installed using man-lift trucks; when the distance is greater than 40 feet or the terrain does not allow the truck's boom to reach the pole, a lineman will climb the pole to perform the field work. Installation of aerial fiber optic cable is accomplished with a moving work zone. Proper signs, traffic control, and safety gear will be maintained at all times to ensure a safe work zone area for the workers and the motorists traveling in the vicinity.

Microwave technology will be used along four route segments within the planned WRAP network. The existing telecommunications tower at Mary Hill will be linked to a new microwave tower at Diamond Gap and, further down the line, to a rooftop antenna in Glenwood. The microwave tower at Diamond Gap will be constructed on land owned by and leased from the Washington State Department of Natural Resources (DNR). An 80-foot, lattice-type, self-supporting tower structure will be constructed within a fenced enclosure. A prefabricated concrete equipment shelter will be placed on a 10-foot by 20-foot concrete pad. The shelter will contain two separate rooms: one for telecommunications equipment, and one to house an emergency backup propane power generator. A short segment of microwave technology will also be used to link an existing microwave site at Augsberger Mountain to a pole-mounted antenna and electrical panel located at Mill A. No

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additional structures or generators will be required, and ground disturbance is limited to that required for installation of a single pole. A new fiber equipment shelter, approximately 10 feet by 6 feet, will be installed at the Wind River Nursery and at the Port of Skamania Business Park in North Bonneville. New microwave antennas will also be installed at three existing telecommunication towers in Port Angeles, Clallam Bay, and Neah Bay.

Finally, approximately 47,000 linear feet (9 miles) of 9-to 10-inch diameter, multi-purpose cable will be installed across Willapa Bay, extending power and broadband data service from the City of Raymond on the east side to the community of Tokeland on the west side. Approximately 8 miles of cable will be installed in and under the intertidal and sub-tidal areas of Willapa Bay between these two communities. Cable installation methods will include a combination of hydro-plow insertion, directional boring, and open trenching, as deemed most suitable for avoiding or reducing impacts to sensitive shorelines, cultural and natural resources. These resources include, but are not limited to, wetlands, bluffs, and eelgrass habitats in various portions of the installation area. Open trenching will be performed in upland areas that contain less sensitive habitats. Directional drilling will be used to avoid wetlands, bluffs, and cultural resources in the landward portions of the Project area. Two concrete vaults will be required to facilitate directional boring. Each concrete vault will be approximately 16 x 10 feet (160 square feet each) with an elevation above existing grade of approximately 10 feet. This additional elevation, along with berming, will help prevent flooding of the vault which will contain a field splice as the cable transitions from directional drilling to surface trenching.

NoaNet will follow state and local guidelines for permitting and construction practices. Similarly, NoaNet will adhere to all applicable Washington State Department of Transportation (WSDOT) standards and permit requirements in implementing the Project as outlined in the September 2010 Environmental Assessment.

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 -Fiber and Wireless Network Configuration (Preferred Alternative). As noted in the Project Description, this effort will include installation of approximately 930 miles of fiber optic cable, microwave wireless transmission equipment, and ancillary infrastructure such as vaults, hand holes, cabinetry, and small storage structures across 6 separate regions and 20 counties in Washington. A combination of underground installation, aerial cable, and wireless technology is planned for the WRAP network. This Project also includes direct connection of targeted community anchor institutions throughout Washington State, as indicated in the BTOP grant. Final determination of the exact installation method and the

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possible need for directional borings at stream crossings, areas of potential cultural significance, etc., will be made during design and staking of the Project.

No Action Alternative. No action was also considered. This alternative represents conditions as they currently exist for the residents and institutions in Washington State. Under the no action alternative, connection and availability of broadband services would not be improved. There would be no significant positive economic impact on the communities and community anchor institutions, which would be a hindrance to sustainable community growth and enhanced household and business services. However, implementation of the no action alternative would not result in any potentially adverse impacts to historic, cultural, and natural resources. The EA examined this alternative as the baseline for evaluating impacts related to other alternatives being considered.

Alternatives Considered But Not Carried Forward. No significant alternatives were considered for the majority of the Project. Using microwave transmission technology for the entire Project was considered but determined to be infeasible because the telecommunication bandwidth required for the Project is far beyond what wireless technologies can carry using today's technology. Nevertheless, microwave transmission is an alternative for last mile connectivity, as those fiber segments are not predicted to carry more than 100 Mbps per link. There are exceptions in this Project where microwave transmission is appropriate, particularly on short routes where telecommunications towers currently exist and where the community has expressed opposition to fiber installation (either aerial or buried). Based on these considerations, it was determined that the most feasible approach for the WRAP network was to construct the network using a combination of both fiber and wireless infrastructure.

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 no long-term impacts on noise. Any short-term increases in ambient noise levels will be minor and limited to the construction period. Construction noise will be addressed via standard mitigation measures (e.g., requiring appropriate mufflers, limiting construction times). The Project will not exceed typical levels of noise associated with excavation equipment and will be well within the limits of all ROW permits. Vibratory equipment will not be allowed on the route near the coastal area of Pacific County; this limitation will result in lower noise levels and avoid disruption of known nesting and bird

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habitat in the area. With these mitigating measures in place as part of the preferred alternative, significant impacts to ambient noise levels within the Project area are not anticipated. Moreover, because no construction or other Project activity would be implemented, the no action alternative would have no impacts on ambient noise levels in the Project Area.

Air Quality

Impacts to air quality associated with this Project will be limited to the period of construction. Installing underground fiber primarily via plowing will limit the need for vegetative clearing and disruption of soils that regionally have a low to moderate resistance to generation of fugitive dust when disturbed. Nevertheless, short-term fugitive dust emissions may exceed typical levels during Project construction. The Project will implement standard dust suppression protocols during all intrusive activities. Short-term exhaust emissions from heavy equipment used during construction may also temporarily impact air quality in the Project area. To address this issue, and in accordance with the Washington State Department of Ecology (DOE) requirements, proper air filters will be used on construction equipment to minimize exhaust fumes. Greenhouse gas (GHG) emissions will be minimized through use of modern construction equipment and prohibitions on excessive idling of equipment when not in use. With these protective measures in place, network construction is not expected to have long-term impacts to air quality, and short-term impacts will be minimized. The no action alternative would include no construction or ground disturbance activity. Accordingly, the no action alternative would have no impacts on air quality in the Project area.

Geology and Soils

There will be no impacts to geology or soils as a result of implementing this Project in accordance with the preferred alternative. Multiple sections along the planned fiber optic route are located within rocky areas, and some soils may be susceptible to erosion. Some of the routes are located in areas that contain steep slopes, which can represent a "severe" erosion hazard as defined by the USDA. Approximately 8 miles of the Project route will disturb a corridor of intertidal and sub-tidal sediments (approximately 200,000 square feet). Proper erosion control techniques will be employed during fiber optic cable installation; specific erosion control methods will be selected based on the slope and soil type affected.

Most of the proposed aerial route in the Northwest Region traverses areas where the soil has been classified as Farmland of Statewide Importance, as defined by the Washington State DOE. The aerial route in the North Central Region also passes areas that have a Prime Farmland soil designation, as defined by the Natural Resources Conservation Service. Impacts on these soils will be minimized by installing the new infrastructure aerially instead of underground. Installation of aerial fiber will not alter soil quality or eliminate the possibility of farming along these portions of the route. Any necessary replacement poles will be inserted in existing utility pole holes or placed within 1 foot of the existing pole. The Project will, at

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times, pass through or near active agricultural lands where a variety of crops are grown. Specific coordination with property owners will be conducted to maintain access and avoid impacts to soil and crops on these properties. Construction of the planned new tower and concrete pad will be limited to previously disturbed soils. All excavated soil will be backfilled on site and re-graded to pre-construction conditions. Given these plans and protective measure protocols, implementation of the preferred alternative will not result in significant impacts to geology or soil within the Project area. Moreover, the no action alternative would have no impact on geology or soil in the Project area because no ground disturbance would occur.

Water Resources

More than 150 streams, rivers, and surface water bodies will be encountered along the proposed 930 miles of cable installation. All rivers, creeks, and streams along the planned Project routes will be avoided by directional boring at a depth of not less than 10 feet below the stream bed or, if possible, attaching cable conduit on bridges in accordance with WSDOT requirements and applicable permits. In some locations, fiber will be installed aurally on existing poles to avoid impacts to surface waters. Wetlands also occur along the various Project routes. Where necessary, Project infrastructure will be installed in the road shoulder to avoid wetlands on underground routes.

In addition, the Project has been designed to avoid and minimize impacts to wetlands to the extent feasible for the Willapa Bay crossing. Directional drilling will be used to avoid impacts to the high-quality Category I and II estuarine wetlands located within the Project area. To facilitate direction drilling of the cable route across Willapa Bay, two vaults will be permanently placed in a Category III wetland that is actively being used as pasture land along the western approach of the cable alignment. Approximately 420 square feet of wetlands will be displaced by the functional footprint of the two vaults, including berming and shading impacts. NoaNet will mitigate for these wetland impacts per the mitigation and monitoring plan included as part of the *Willapa Bay Cable Crossing Conceptual Conservation Measures and Monitoring Plan* (April 30, 2012). Temporary wetland impacts will be restored by re-grading and seeding or through natural colonization during or immediately following cable installation.

The U.S. Army Corps of Engineers (USACE) requires a Section 404 Nationwide 12 Permit (NWP-12) for all construction occurring in or over surface water, including wetlands. In accordance with that permit, no changes will be made to pre-construction contours as a result of this Project. BMPs specified in the EA will also be implemented to ensure that there will be no adverse impacts on water resources. In particular, erosion control and water pollution control measures will be implemented in accordance with USACE requirements and WSDOT Standard Specifications for Road, Bridge, and Municipal Construction.

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Based on the limited depth of underground installations, the Project is not expected to impact local or regional groundwater. Neither the placement of the fiber optic cable nor the operation of the cable to provide data transmission would alter any floodplains as they are currently delineated. Project activities will not modify flow paths or increase flooding problems and/or erosion. There will be no dredging, filling, dumping, or backfilling within floodplain areas. The natural ground cover will be protected during the construction phase, and any ground disturbance will be restored to preconstruction condition. Most of the cable routes encroaching on existing floodplains will involve aerial installations.

Both the Klickitat and White Salmon Rivers are designated as Wild and Scenic Rivers and located within the Project area. During installation of the fiber optic route adjacent to the Klickitat River, special precautions will be implemented to protect the river in accordance with Section 404 Nationwide 12 Permit requirements and BMPs noted above. The White Salmon River is not expected to be impacted by Project activities because construction will not occur in the immediate vicinity of this surface water body. The preferred alternative will be implemented in accordance with Coastal Management Zone protocols for preventing erosion, protecting natural habitats and shell fishing designations, and providing for other activities deemed critical to maintaining a healthy coastline. Thus, the Project will have no adverse impact on coastal management zones identified in Pacific, Clallam, Whatcom, and Wahkiakum Counties.

Based on these findings, no significant impacts to water resources are anticipated as a result of implementing the Project in accordance with the preferred alternative. The no action alternative would have no impacts on water resources in the Project area because no construction activities would occur.

Biological Resources

Implementation of this Project will have minimal impacts to wildlife and vegetation as a majority of the work will be performed within previously disturbed public ROW or existing utility corridor easements. Impacts associated with elevated construction noise are transitory and will primarily affect songbirds, rodents, deer, and other wildlife in the immediate area. Minimal clearing of vegetation will be required for the Project, and planned installation methods do not significantly disturb vegetative habitat. Grasses and small scrub vegetation removed within the ROW will be re-vegetated with seed in accordance with WSDOT and/or county specifications. The northern portion of a planned route in the East Central Region is located adjacent to the Turnbull National Wildlife Refuge. For this portion of the Project, construction activities will be coordinated with the U.S. Fish and Wildlife Service (USFWS) to ensure that the resident wildlife population is not impacted by construction activities.

This Project includes construction of one new communication tower in the South Central Region. This tower will be constructed on land that was previously used as a fire tower site

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and is therefore previously disturbed. In addition, microwave antennas will be located on top of existing buildings and on existing towers. Measures will be implemented at these sites to prevent bird strikes. Road access and fencing of the tower site will be minimized to reduce or prevent habitat fragmentation and disturbance, and to reduce above ground obstacles to birds in flight. Appropriate seasonal restrictions on construction activity will be implemented, as necessary, to avoid disturbance during periods of high bird activity. Security lighting on communication tower sites will be down-shielded to keep light within the boundary of the site.

In addition to common forms of wildlife, several listed, endangered, or threatened species have been identified in the Project area. These species will require mitigations to prevent or minimize potential adverse impacts during Project implementation. In the South Central Region, these species include Chum salmon (*Oncorhynchus keta*), Coho salmon (*Oncorhynchus kisutch*), Chinook salmon (*Oncorhynchus tshawytscha*), steelhead trout (*Oncorhynchus mykiss*), bull trout (*Salvelinus confluentus*), Dolly Varden trout (*Salvelinus malma*), and the Northern spotted owl (*Strix occidentalis caurina*). In the Southwest Region, these species include Chum salmon (*Oncorhynchus keta*), steelhead trout (*Oncorhynchus mykiss*), and the Northern spotted owl (*Strix occidentalis caurina*). No impacts to the aquatic species will result from the preferred option of attaching cable to existing bridge structures. If bridge crossings cannot be accomplished however, directional drilling at a depth of 10 feet or more below the stream bed will be required. Directional drilling equipment will be located outside of stream buffers and appropriate protective measures (e.g., silt fencing, bales) will be used to prevent erosion, protect riparian vegetation, and reduce the possibility of foreign substances entering the water. To the extent practicable, work will be completed during low flow months, avoiding seasonal spawning periods. No impact to the nocturnal Northern spotted owl is anticipated during Project implementation, as construction will be conducted during daylight hours. Moreover, the Project will not disturb any vegetation of significance or potential habitat for the Northern spotted owl, which typically resides in old growth forests. All aerial fiber installation will be accomplished on existing poles, and no new poles or guy wires are proposed. Additional BMPs for both aquatic and avian species protection are indicated in the EA.

On March 20, 2012 and March 26, 2012, NTIA entered into informal consultation with the USFWS and the National Marine Fisheries Service (NMFS), respectively, regarding potential impacts from Project activities within Willapa Bay to the bull trout, marbled murrelet (*Brachyramphus marmoratus*), western snowy plover (*Charadrius alexandrinus nivosus*), Lower Columbia River Chinook salmon, Upper Willamette River Chinook salmon, Columbia River Chum salmon, Southern DPS North American green sturgeon, Southern DPS Pacific Eulachon. In a letter dated May 23, 2012, the USFWS concluded that, based on the information provided by NTIA and NoaNet and implementation of protective measures, impacts to the bull trout, marbled murrelet, and western snowy plover associated with the Project would be insignificant

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or discountable. In addition, the USFWS requested to be notified at least 7 days prior to the start of construction activities for the Willapa Bay crossing.

A portion of the Willapa Bay Project route lies within eelgrass habitat. To prevent the loss of valuable eelgrass habitat, the cable alignment was designed to traverse the narrowest band of existing eelgrass with impacts constrained to the eastern third of the alignment where eelgrass cannot be practicably avoided. Based on a macrovegetation survey, the impact is likely to be approximately 400 square feet of eelgrass, but this effect will be minimized by transplanting eelgrass out of the trench area. Prior to trenching activities, a biologist will remove and relocate eelgrass, with rhizomes intact, from the delineated trench route and transplant them in suitable habitats adjacent to the existing eelgrass beds. Timing for this work will coincide with the NMFS agency-approved in-water work window that runs from October 1 through February 15. Survival of the transplanted eelgrass and re-colonization of the trenched areas by adjacent eelgrass sources will be monitored as described in the *Willapa Bay Cable Crossing Conceptual Conservation Measures and Monitoring Plan* (April 30, 2012). In a letter dated May 29, 2012, the NMFS concluded that, based on the information provided by NTIA and NoaNet and implementation of these protective measures, the Project “may affect, but is not likely to adversely affect” the Lower Columbia River Chinook salmon, Upper Willamette River Chinook salmon, and Columbia River Chum salmon. The NMFS also concurred with the NTIA determination of “may affect, not likely to adversely affect” the Southern DPS North American green sturgeon, Southern DPS Pacific Eulachon, and associated critical habitat. Monitoring and coordination with the USFWS and the NMFS will be conducted as needed to ensure that potential impacts to biological resources are being appropriately managed.

Based on this analysis and proposed protective and conservation measures, no significant adverse impacts to biological resources are anticipated as a result of implementing the preferred alternative for this Project. The no action alternative would have no impacts on biological resources in the Project area because no construction or clearing activity would occur.

Historic and Cultural Resources

Numerous archaeological sites, cemeteries, and historic properties have been identified and documented within a half-mile on either side of the planned Project route. In all areas along the Project route, the general approach will be to avoid archaeological sites whenever possible. Avoidance may be accomplished by 1) modification of the route alignment, 2) use of directional boring, or 3) aerial installation. In any event, it is critical that installation equipment and vehicles remain on the paved road surfaces while working in the vicinity of a site that extends into the ROW. If avoidance cannot be achieved or unexpected material is found, further investigation will be required; specific needs will be determined on a case-by-case basis.

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The Washington State Department of Historic Preservation and NTIA developed a Draft Archaeological Monitoring and Discovery Plan to detail monitoring requirements and outline a process for interagency coordination during Project implementation in areas of particular concern. This document will be used to create an individual monitoring plan for each route that requires monitoring and identify the resources specific to each route. Copies of the individual monitoring plans for each route will be provided to all consulting parties and tribes before construction begins. Tribes may request that their own monitors be present during construction. As part of the planning process, tribes with interest in the Project area were contacted. The Coeur d'Alene and Nez Perce Tribes requested additional information on planned activities. As specified in the Monitoring and Discovery Plan, interagency communication will continue throughout the Project implementation period.

In a letter dated August 24, 2010, the SHPO indicated that the Project will have No Adverse Effect on historic properties provided that NoaNet develops monitoring plans with provisions for ongoing consultation for culturally sensitive areas identified along eight specific routes. NoaNet provided a template plan for SHPO and THPO review. As project staking moves forward, the template will be customized to identify consulting parties, known resources of concern, and specific archaeological provisions for each of the sensitive routes. Monitoring reports will be provided to consulting parties subsequent to construction. In addition, the SHPO reviewed the revised proposed SW-1 fiber reroute and Historic Treatment Plan for Willapa Bay in Pacific County. In a letter dated March 20, 2012, the SHPO concurred with the determination of No Adverse Effect.

Underground cable installation will have no visual impacts to historic properties and/or districts. Aerial fiber placement will take place on existing poles with existing lines, with no adverse impacts. The majority of fiber placement is taking place along road ROWs, and will have no direct impacts to historic buildings and/or districts. To prevent indirect impacts, no high vibration construction equipment will be used in the vicinity of these resources. Cemeteries with boundaries located within 200 feet of the Project route will be monitored during construction, as the original boundaries of early 20th century cemeteries may not be consistent with those delineated today. In the event that buried cultural deposits are inadvertently discovered, construction in that vicinity will be halted and the State Historic Preservation Office (SHPO) and interested tribes will be immediately contacted to assess the significance of the discovery.

Based on these findings, and considering the mitigations to be implemented, the preferred alternative is not expected to have adverse impacts on historic and cultural resources. The no action alternative involves no infrastructure installation or ground disturbance and would have no impacts on historic and cultural resources.

Aesthetic and Visual Resources

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Natural resources in most of the Project area vary from rolling croplands, forested areas, range and pasture lands. The Project route occurs mostly within rural counties, running along croplands and irrigation channels. Project routes will be located within the Gifford Pinchot National Forest, Mt. Baker Snoqualmie National Forest, and Olympic National Forest; and adjacent to Turnbull National Wildlife Refuge, Columbia National Wildlife Refuge, McNary National Wildlife Refuge, Toppenish National Wildlife Refuge, Julia Butler Hansen National Wildlife Refuge, and Olympic National Park.

As stated previously, the Project includes construction of telecommunications shelters and one new microwave tower. The shelters are small (roughly 10 feet by 6 feet) and will be installed at previously disturbed sites at Wind Hill Nursery and the Port of Skamania Business Park in North Bonneville. A new telecommunications shelter and microwave tower will also be installed at Diamond Gap on property owned by and leased from the Washington State DNR. The Diamond Gap site was identified in collaboration with DNR, in part because the site was previously occupied by a fire lookout tower. The tower has since been decommissioned and removed, but the historical use indicates suitability for another tall structure. The new microwave tower will be an 80-foot lattice-type, self-supporting structure located inside a fenced enclosure with a 10-foot by 20-foot shelter. The shelter will include a telecommunications equipment room and a generator room. An above ground propane tank will also be located within the fenced area. Two microwave antennas will be installed on existing telecommunication towers in Raymond and Holy Cross. Above ground cabinets will also be installed, but are green in color to blend with the landscape. As necessary, buried structures (e.g., vaults and hand holes) can be rated for traffic uses. Landscaping around cabinets and vaults will be restored to pre-construction condition.

Based on this analysis, the preferred alternative will not have a significant adverse impact on aesthetic and visual resources. The no action alternative would similarly result in no impacts to aesthetic and visual resources in the Project area because no changes would be made to the existing environment.

Land Use

The majority of the land use along the planned Project route is agricultural. The Project routes also travel through small communities, towns, and cities to be served by the WRAP network. Urban and community land uses and activities are present in these areas. No land use along the planned fiber optic cable routes will be modified or impacted by Project implementation. Similarly, the no action alternative will not adversely impact land use because there will be no changes to the existing environment.

Infrastructure

Major and minor highways and local roadways are easily accessible throughout the State. Although partial obstructions may occur, no roadway will be blocked during Project

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construction. School buses, fire trucks, police and sheriff vehicles, and ambulances will be provided with accessibility in accordance with traffic control and safety plans prepared for the Project. With implementation of these mitigation measures, the preferred alternative is not expected to have adverse impacts on existing infrastructure. Because there would be no changes to the existing environment, the no action alternative would not adversely impact infrastructure. However, the no action alternative would not enhance telecommunications infrastructure in the Project area, as expected to result from implementation of the preferred alternative.

Socioeconomic Resources

The preferred alternative will not have an adverse impact on socioeconomic resources. The fiber optic cable to be installed will offer significant beneficial impacts to rural portions of the Project area. The community anchor institutions that will be directly connected to the WRAP network will also receive significant benefits from the planned Project. Disadvantaged and vulnerable populations in unserved and underserved communities will be provided with access to enhanced and affordable broadband services. These communities have unemployment and underemployment rates that are higher than national averages. Anticipated positive impacts focus on educational opportunities, access to information and data, interconnections between medical facilities, and streamlined emergency response efforts. NoaNet's Project also targets educational and job training facilities. Construction of this Project is estimated to create approximately 1,950 jobs during the three year Project implementation period. Long-term job growth is expected through improvement of commerce opportunities. Implementation of the preferred alternative will result in beneficial impacts on socioeconomics in the Project area. Under the no action alternative, anticipated benefits of the WRAP network would not be realized.

Human Health and Safety

Human health and safety will be improved by the Project through provision of improved broadband service to rural communities, including direct connection to medical facilities. The broadband cable to be installed under this Project will be integral to providing the community with emergency and medical services.

Several potentially hazardous waste sites have been identified in the vicinity of the Project routes. However, these sites are not expected to adversely impact Project implementation because Project construction will occur in ditches and utility corridors along highways and roads, rather than on identified hazardous waste sites. Good housekeeping and material management practices will be implemented for this Project, along with appropriate spill prevention and cleanup protocols. Protection of worker health and safety will be an integral part of the contract documents developed for the Project. A detailed Traffic Safety Plan will be developed to outline local permit and construction requirements. Because construction activities will be largely limited to ditches and utility corridors along highways and roads,

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workers will not be located directly in the path of traffic. Furthermore, potential impacts to the traveling public will be minimized because there is no need to close or re-route traffic lanes. Contractors will comply with Federal Highway Administration (FHWA) requirements and other relevant guidelines with regard to warnings, signage, high-visibility safety apparel, and accident prevention. The preferred alternative will have no adverse impacts on human health and safety during the construction phase, and will have long-term positive impacts on socioeconomic resources thereafter. The no action alternative would have no adverse impacts on human health and safety, but anticipated positive impacts associated with the WRAP network would not be realized.

Cumulative Impacts

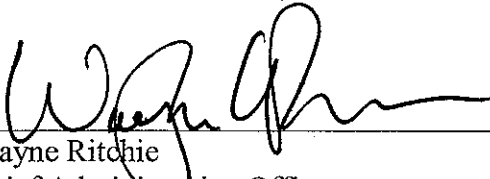
The only infrastructure activity currently in progress within the WRAP network area involves WSDOT road work on a very limited portion of a Project route in the South Central Region of Washington State. No other known projects (e.g., road widening projects, utility service projects, and other similar proposals) are currently being planned by other agencies within the Project area. Nevertheless, during design and permitting of the Project, every attempt will be made to coordinate efforts to minimize disruptions and potential cumulative impacts. In support of such efforts, NoaNet has been identifying and negotiating opportunities to collaborate with other utilities, federal, state, and tribal entities and various Emergency Management Service organizations. Positive impacts from such collaboration will include minimizing disruption within the Project area and reductions in overall Project costs. No significant adverse cumulative impacts are anticipated with regard to either the preferred alternative or the no action alternative.

Decision

Based on the above analysis, NTIA concludes that constructing and operating the Project as defined by the preferred alternative, identified BMPs, and protective and conservation 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.

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Issued:



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

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