



Environmental Assessment (EA)

For

ION NewCo, Corp.

ION Upstate New York Rural Broadband Initiative

Broadband Technology Opportunities Program (BTOP)

&

***National Telecommunications &
Information Administration
(NTIA)***

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1.1 Executive Summary

ION NewCo, Corp. (ION) of Albany, NY has been awarded grant funding from the National Telecommunications and Information Administration (NTIA) through the Broadband Technology Opportunities Program to place new and utilize existing middle mile telecommunication facilities to connect approximately 125 anchor institutions in 79 communities throughout the state of New York, and in Vermont & Pennsylvania – ION Upstate New York Rural Broadband Initiative. When complete the project will connect the proposed anchor institutions with a state-of-the-art redundant fiber network at speeds from 10Mbps to 1Gbps and more. This project is needed in the proposed areas since fiber based facilities are not available to the proposed anchor institutions.

The network is a hybrid of aerial and buried fiber cable that provides the most economical way to build and later maintain the large network. The alternatives include using exclusively buried or aerial fiber or using wireless. Using all aerial would be costly to maintain, with the weather in New York, including snow, ice, wind storms. The potential for down poles also exists from accidents. In some locations aerial cable is not acceptable for aesthetic reasons and existing utilities are already buried. To do all buried, also would not work, due to the terrain in portions of New York, being mostly rock, having numerous wetland areas, and vast historic sites. It would be very difficult, costly and time consuming to place the whole network underground. Wireless would be difficult with the terrain, including valleys, hills and mountains. Wireless also could not provide capacity sufficient for the middle mile needs of the proposed network. ION does not have access to licensed spectrum for the network, and the no-action alternative does not meet the needs for the project.

The project consists of placing approximately 1300 miles of backbone network and 200 miles of spur routes connecting the anchor institutions to ION's backbone. The construction is proposed to take place in existing road rights of way in rural corridors and existing utility easements and boulevards in town/urban corridors. The proposed new construction routes for the ION Upstate New York Rural Broadband Initiative have potential impacts to environmental, historical and cultural resources.

ION has contacted interested environmental and governmental agencies, as well as consulted with NTIA's NEPA coordinator and staff archaeologist on overall project guidance. Each agency was provided with a description and maps of the proposed project showing the area that could be affected by the proposed routing of new and/or replacement fiber optic cable in the state or district. Each agency was given the opportunity to comment on the proposed project and its potential effect on the environment. These agencies are as follows:

- Historical Preservation Office – Federal Governing Body (NTIA), Tribal, and State (New York, Vermont, Pennsylvania)
- Tribe Consultation Letters
- US Fish and Wildlife Service, New York Office

- New York Department of Environmental Conservation
- Vermont Agency of Natural Resources
 - Vermont Department of Fish & Wildlife
 - Vermont Department of Environmental Conservation
- Pennsylvania Department of Conservation and Natural Resources
- Pennsylvania Fish and Boat Commission
- Pennsylvania Game Commission
- Pennsylvania Department of Environmental Protection
- Service Wetland Management
- Army Corps of Engineers from PA, NY, VT

These agencies have subsequently had the opportunity to review the project and submit responses or permits related to ION.

After contacting the commenting agencies and reviewing the proposed construction routes, no significant impacts to the existing environment were found.

1.2 Chapter 1 – Purpose and Need

The ***problem*** of unavailable and unaffordable broadband service in Upstate New York is severe, subjecting rural communities to vast economic and quality of life disadvantages. New York is ready, ***shovel ready***, for true economic growth, but we have a huge weakness in the necessary infrastructure needed for that growth. The fact is that Upstate New York has no or limited access to large capacity inexpensive broadband. New York has reasonably priced real estate, an immense supply of inexpensive hydro power, an educated workforce, major underutilized highways and fully developed business parks throughout the state that are ready and waiting for businesses. As one of the leaders in the broadband field in New York, ION has developed a well thought out, best designed plan that reaches the largest population of unserved and underserved communities in the state. This plan will give New York a chance to compete in an economic recovery.

The proposed project will deliver broadband speeds from 10Mbps to 1Gbps and more to critical anchor institutions within the proposed service area. The project will use American Recovery and Reinvestment Act of 2009 (“ARRA”) funds to add backbone capacity to leverage the existing network of ION and use ARRA funds to specifically target some rural and non-rural fiber deployment in areas where ION has not placed fiber in the past due to economic infeasibility. ION estimates that approximately 125 community anchor institutions and public safety agencies will be added to the network.

The locations identified within the application do not currently have access to fiber-based broadband services.

This project is being developed and managed by two companies, a for-profit company ION, and D.A.N.C, a public benefit corporation have agreed to share their resources and