

**National Telecommunications and Information Administration
Broadband Technology Opportunities Program
Finding of No Significant Impact
OneCommunity Transforming Northeast Ohio Project**

Summary

OneCommunity applied to the Broadband Technology Opportunities Program (BTOP) for a grant to install approximately 893 miles of new fiber. The new network will consist of a hybrid of aerial and buried fiber. The proposed action passes through 22 counties in northeast Ohio, and is referred to as the Transforming Northeast Ohio Project (Project).

The National Telecommunications and Information Administration (NTIA) awarded a grant for the Project to OneCommunity 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 is driven by 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.

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

The Project includes:

- Installing a hybrid broadband network of aerial and buried fiber through 22 counties in northeast Ohio;
- Installing the 893-mile network in existing, maintained utility rights-of-way (ROWs), causing approximately 74 acres of total earth disturbance;
- Installing fiber on up to 788.6 miles (88.3% of the 893-mile total) on existing utility poles;
- Installing fiber within up to 83.3 miles of new underground conduit (9.3% of the 893-mile total) via trenching, plowing, or direction boring);
- Installing fiber within up to 10.9 miles of existing underground conduit (1.2% of the 893-mile total);

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- Installing fiber on up to 21 new utility poles spanning 0.6 miles (0.07% of the 893-mile total);
- Connecting to 9.7 miles of existing dark fiber; and
- Installing hub sites, consisting of system hardware in the space equivalent to a large filing cabinet, installed at critical CAI institutions or other OneCommunity customer sites (requiring no interior or exterior structure renovations).

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 the Project is to bring affordable broadband service to unserved and underserved communities in northeastern Ohio. Such communities have high unemployment, high poverty rates, below average family incomes, and low population densities. The Project will deploy high-speed, efficient, low-cost broadband infrastructure and service in areas where, to date, it has not been economically feasible to install telecommunications infrastructure. The Project will result in the implementation and operation of a fiber network in these areas that provides sufficient, requisite, high-speed, electronic data and voice communication services capacity, notably to community anchor institutions. Businesses and residences also will be served by either incumbent providers or new ventures leveraging the new, available capacity. This fiber network is needed to handle the increasing demand for broadband services by community anchor institutions, residents, and businesses of northeastern Ohio. These include areas most in need of high-speed, efficient, low-cost broadband infrastructure. Under current conditions, many of these areas lack sufficient communications connectivity (including voice and information

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technology), operate on dial-up networks, or lack these utilities entirely. These communication infrastructure shortfalls limit economic growth and development of currently rural, generally impoverished areas.

Project Description

The Project involves installing approximately 893 miles of new fiber in 22 counties in Ohio, including Trumbull, Geauga, Lake, Sandusky, Erie, Richland, Crawford, Marion, Delaware, Franklin, Stark, Summit, Mahoning, Medina, Ashland, Lorain, Cuyahoga, Wayne, Tuscarawas, Columbiana, Portage, and Ashtabula Counties. The fiber components will tie into existing OneCommunity fiber networks in Ohio, providing a series of rings of network coverage within the region. The project involves installation of both buried and aerial fiber. OneCommunity will install 788.6 miles on existing utility poles, 10.9 miles within existing underground conduits, 83.3 miles within new underground conduits (via trenching, plowing, or directional boring), and 0.6 miles on 21 new utility poles. In addition, approximately 9.7 miles of dark fiber will be used in specific locations. Construction will take place within existing transportation and utility ROWs and will disturb approximately 74 acres of land.

OneCommunity will install approximately 788.6 miles of aerial fiber optic cable along the Project route on existing utility poles provided by municipal, county, telecommunications, and power companies. OneCommunity will work with the pole owners to identify any poles that need to be replaced prior to fiber installation. The number of pole replacements required is unknown at this time. Where pole replacements are required, poles will be replaced adjacent to the existing pole, with no more than 20 square feet disturbed per pole location. The existing pole will be removed and taken to an appropriate hazardous waste disposal location. A new hole will be drilled by an auger truck to a maximum depth of 6 feet and the new pole inserted. Clean topsoil will be used to fill in any hole immediately after the pole placement is complete. No other ground disturbance will be associated with pole replacement activities; all work will occur within the existing utility ROW. Installation of up to 21 new utility poles across 0.6 miles will occur as described above, and new poles will be installed approximately every 200 feet.

OneCommunity also will install 94.2 miles of fiber underground where existing poles (aerial installation) and/or dark fiber are not available, as well as in locations where new aboveground infrastructure is not permitted or cost-effective. Approximately 10.9 miles of underground fiber will be installed within existing underground conduits by pulling the fiber through the conduits. Approximately 83.3 miles of underground fiber will be installed via trenching, plowing, and directional boring. Trenching will involve a maximum 4-foot wide construction corridor within an existing utility ROW. A 4-inch wide, approximately 30-inch deep trench will be cut, the fiber laid, and the trench immediately backfilled. Plowing involves a machine that will open the earth to a depth of approximately 30 inches, install the fiber, and close the trench in a single pass. Directional boring involves digging burrows perpendicular to the resource to minimize bore length, to the extent possible and as site-specific conditions warrant. The depth of the bore will depend upon the resource being avoided. The bore itself will be approximately 6 inches in diameter. At each end of the bore location, an approximately (maximum) 0.1-acre entrance and

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exit working area will be established to allow the boring equipment to operate. As the bore is completed, the fiber will be run through the bore hole. Upon completion of the bore, the area will be restored to pre-project conditions. Lastly, along each new underground fiber run, OneCommunity will install hand holes on an as-needed basis – notably at splice points to the existing backbone and at lateral connections. A typical hand hole measures up to 3-feet wide by 3-feet long by 3-feet high, and is typically made of pre-cast concrete. Installation will include digging the hole, laying a gravel base, and placing the pre-cast pieces of the hand hole. Upon completion, the area will be restored to pre-project conditions, except for a standard access lid or cover.

OneCommunity also will install hub sites in each community served, and will provide a location for system hardware in each community. Hub sites will be located on the premises of OneCommunity customers, as has been done with previous OneCommunity fiber projects. Wherever possible, hub sites will be located within critical community anchor institutions. Electronic hub equipment will be located near the customer's information technology equipment, and will require the space equivalent to a large filing cabinet. No interior or exterior structure renovation will be required; the hub equipment will be connected to the network via overhead lines similar to other existing electric and telephone lines, or will be placed within existing or new underground conduit. The hub sites will be selected based on customers with facilities that have 24-hour access and an existing, maintained backup generator for power during outages.

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 Installation (Preferred Alternative). As noted in the Project Description, this effort will include installation of approximately 893 miles of new fiber, using both aerial and underground methods, and installing hub sites in each community served. The new fiber optic cable will be installed aerially on existing and new pole lines and buried via trenching, plowing, and directional boring along the Project route.

No Action Alternative. No action was also considered. This alternative represents conditions as they currently exist in northeast Ohio. Under the no action alternative, new fiber infrastructure would not be constructed and the current level of communications service in the region would not improve. Additionally, broadband services would not be provided to CAIs in the Project area. The EA examined this alternative as the baseline or benchmark for evaluating impacts related to other alternatives being considered.

Alternatives Considered But Not Carried Forward. OneCommunity considered the alternative of installing an all-wireless network. However, a wireless broadband system would not be technologically or economically feasible in the region. Also, wireless technology provides inferior bandwidth availability and reduced operations reliability. OneCommunity also

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considered an all-underground alternative. However, an all-underground alternative would be more expensive, result in greater adverse environmental effects, and provide service to a more limited geography. OneCommunity also considered all-aerial construction for the Proposed Action. However, in several locations, existing utility poles are over-crowded and new pole installation or pole replacement would be cost-prohibitive. In these locations, OneCommunity determined that trenching, plowing, and/or directional boring within the existing utility ROW would be more cost-effective. As such, an all-aerial alternative was eliminated from further consideration. Lastly, OneCommunity considered other route alternatives. However, other routes initially considered by OneCommunity would not reach as many potential community anchor institutions and customers, would require additional infrastructure upgrades due to overloaded poles or conduits, would not align costs with available ARRA funding, would require additional new utility ROW, would not achieve the necessary redundant ring, and would incur additional costs (i.e., due to additional length or additional trenching) without reaching a reasonable number of additional potential users. Alternatives involving new utility ROW and additional ground disturbance would also result in potentially increased adverse environmental effects.

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 (including greenhouse gases [GHG]), Geology and Soils, Water Resources, Biological Resources, Historic and Cultural Resources, Aesthetic and Visual Resources, Land Use, Infrastructure, Socioeconomic Resources, and Human Health and Safety.

Noise

This Project will have no impacts on noise during long-term operation. However, short-term increases in local, ambient noise levels are expected during the construction period as a result of using construction equipment. Noise created by machinery used during installation will be temporary and localized in nature, and may temporarily impact some nearby sensitive receptors during normal business (daylight) hours. Temporarily increased levels of noise will terminate upon completion of construction, and the noise environment will return to pre-construction conditions. To reduce noise impacts, construction activities will comply with local ordinances concerning noise; construction may be limited to specific, daylight work hours; construction equipment will be maintained per the manufacturer's recommendations; and construction activity will be limited to the minimum amount of time required. Based on these considerations, no significant impacts on noise are expected to occur as a result of Project implementation.

Air Quality

Potential impacts to air quality associated with this Project will be associated with the proposed construction activities. Fiber optic cable installation will result in impacts from construction vehicles on site and the short-term generation of fugitive dust emissions due to minor earth disturbance from trenching, plowing, directional boring, and some pole replacement. The air emissions during construction will be short-term, very minor, localized, and will not result in a

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significant or long-term increase of criteria pollutants in the area. A short-term minor increase in the use of fossil fuel and associated GHG emissions will occur as a result of Project construction, amounting to the release of approximately 198.25 metric tons of equivalent CO₂ emissions – an amount well below the Council on Environmental Quality’s guidance of a presumptive effects threshold of 25,000 metric tons. OneCommunity’s contractors will maintain all construction equipment per the manufacturer’s recommendations, and will limit construction activity to the minimum amount of time required to minimize air quality effects during the construction period. Temporarily increased levels of emissions will terminate upon completion of construction, and the air quality environment will return to pre-construction conditions. During operation of the Proposed Action, no new or additional air quality effects will be anticipated. Therefore, the Project is not expected to result in significant adverse impacts on air quality.

Geology and Soils

The Project will have no impacts on geology in the area as no deep excavation is proposed. However, short-term and localized impacts to soils will occur during Project construction as a result of installation of new utility poles, plowing, trenching, and directional boring. Installation of up to 21 new utility poles over a combined length of up to 0.6 miles will disturb 0.001 acre of soils through drilling of new holes for the new poles in 3 specific locations. Plowing or trenching, as described above, will disturb approximately 22.7 acres of land across 98 specific locations, and directional boring activities will disturb up to 51.0 acres across 83 specific locations. Impacts will include soil mixing and compacting from the proposed installation activities. After installation, only localized, minor, restorative grading will occur at each of these locations to return the areas to pre-project conditions. Also, during operation of the network, no impacts to geology or soils will occur as no additional ground disturbance will occur after construction. OneCommunity will avoid adverse soil impacts during construction activities by using existing infrastructure to the maximum extent possible and returning all disturbed construction areas to pre-project conditions as quickly as possible following construction.

OneCommunity also will obtain an appropriate National Pollution Discharge Elimination System (NPDES) permit from the Ohio Environmental Protection Agency (OEPA) to identify requirements designed to reduce soil erosion. The permit will outline all watershed-specific requirements for storm water, including required stream buffer setback provisions.

OneCommunity will also maintain a minimum 100-foot exclusive setback from the edge of all surface water features during all construction activities, and will bore beneath the resources at an appropriate depth. All surface water boundaries and depths will be determined by a qualified wetlands biologist prior to construction. By implementing surface water avoidance measures and maintaining setbacks, the potential for soil erosion and subsequent sedimentation effects to surface water resources will be reduced or avoided. Also, prime farmland soils will not be affected. The Project will not permanently alter soils or substantially preclude their future use for other purposes; all areas proposed for disturbance are located in previously disturbed utility ROWs. Consequently, the Project is not expected to result in significant adverse impacts on geology or soils.

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Water Resources

Project construction activities could result in short-term, minor impacts on water resources within the Project area. Specifically, the impacts will be associated with the areas proposed for ground disturbance (installation of new utility poles, plowing, trenching, and directional boring). Approximately 73 surface water bodies (7 streams, 6 National Wetland Inventory [NWI] wetlands, and 60 Ohio Wetland Inventory [OWI] wetlands) are present within the proposed alignment where ground disturbance is proposed. Another 84 surface waters (24 NWI wetlands and 60 OWI wetlands) are present within the 200-foot area where ground disturbance is proposed. Construction could impact these surface water resources through the potential to discharge dredge or fill material through erosion and subsequent sedimentation.

Such impacts will be avoided or reduced through specific mitigation measures. OneCommunity will engage a qualified wetland biologist to delineate all areas proposed for ground disturbance prior to construction to identify, mark, and record the edge and depth of the surface water resources, as described above (see *Geology and Soils*). OneCommunity will relocate the proposed ground-disturbing activities to areas identified as not containing potential jurisdiction surface water resources to the extent possible, including maintaining a minimum 100-foot exclusive setback from the edge of delineated surface water features during all construction activities. Should avoidance through activity relocation not be possible, OneCommunity will either directionally bore beneath the surface water resource at an appropriate depth, or will relocate the proposed fiber on existing, available utility poles. Should boring be proposed, OneCommunity will work with the OEPA and the U.S. Army Corps of Engineers (USACE) to ensure proposed boring locations and depths remain protective of the resource. In all cases where directional boring or trenching is proposed in the immediate vicinity of jurisdictional surface waters, OneCommunity will submit detailed drawings, including the delineation results, to the OEPA and the USACE for review and approval. Based on these agencies' review and comment, OneCommunity will prepare a revised engineering diagram to indicate the proper placement of fiber to span the crossing. No trenching will occur within any waters of the U.S., including wetlands, as regulated by the USACE and the OEPA. In any rare case where avoidance of such surface water resources is not possible, OneCommunity will coordinate with the USACE and the OEPA to obtain appropriate authorization prior to construction. At all proposed directional bore stream crossings, OneCommunity will conduct all work during daylight hours to facilitate monitoring; use the minimal amount of pressure or gallons per minute of drilling fluid necessary for the drilling; and monitor the river for any signs of effect. As noted above, OneCommunity also will obtain an appropriate NPDES permit from the OEPA.

OneCommunity also will closely coordinate all proposed crossings of State-designated Scenic Rivers with the Ohio Department of Natural Resources (ODNR), Division of Watercraft, Scenic Rivers Section, and will ensure this agency approves proposed crossing methods and engineering design prior to construction. OneCommunity also will ensure that no more than 500 feet of trench will be open at any given time. Trench opening, installation of fiber, and backfilling will occur so as to minimize the amount of area disturbed. All open trenches will immediately be backfilled, seeded, and mulched within 7 days of completion of fiber installation. OneCommunity will ensure that once a site is cleared and grubbed, temporary sediment and

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erosion controls will be implemented and maintained until final site stabilization is achieved. At disturbed areas within 120 feet of any stream, temporary and/or permanent erosion control cover will be accomplished within 2 days following the installation of the fiber. Temporary seeding and mulching will be no more than 500 feet behind the point of installation of the fiber at any given time. OneCommunity will not directly discharge wastewater of any kind or turbid water into a Scenic River or any tributary watercourse. OneCommunity will conduct clearing and grubbing in the areas directly adjacent to any stream crossings within 72 hours before installation of the fiber.

Additionally, up to 123 303(d)-listed impaired streams will be crossed. In almost all cases, such streams will be crossed via installation of new fiber on existing utility poles. Implementation of the mitigation measures identified above will ensure that additional effects to these already impaired streams and stream segments do not occur as a result of implementing the Project. Implementation of the Project also will result in minimal or no effects to groundwater. At proposed directional bore locations, shallow groundwater could be intersected during the boring process. However, such effects will be negligible and short-term. Boring locations will be sealed upon completion of construction, and no long-term effects to groundwater resources will occur.

Approximately 5 miles of the Project route are located within the Lake Erie Coastal Management Zone. OneCommunity has coordinated with the ODNR, Office of Coastal Management which oversees implementation of the Coastal Zone Management Act (CZMA) and has determined that the Project is considered consistent with the Ohio Coastal Management Program Document and does not require a Federal Consistency review under the CZMA. No new ground-disturbing activities are proposed within the Lake Erie Coastal Management Zone. Consequently, no effects to coastal zones will be anticipated.

The Project route will cross a designated 100-year floodplain in up to 189 locations. Also, 21 locations within a designated 100-year floodplain will be affected by proposed ground disturbance; the remaining 168 locations occur within areas proposed for fiber installation on existing utility poles. However, any effects to 100-year floodplains will be short-term, and will not alter the capacity or extent of these areas. Implementation of the mitigation measures for surface water resources, described above, also will simultaneously reduce floodplain effects. As such, adverse effects to 100-year floodplains are not anticipated.

Lastly, the Project alignment will cross 5 rivers or river segments that are designated as State Wild and Scenic Rivers. These include Conneaut Creek, the Chagrin River, the Grand River, the Olentangy River, and the Ashtabula River. No National Wild, Scenic, or Recreational Rivers are present within the Project area. In each of these locations, the new fiber will span the river through installation on existing utility poles; no ground disturbance is proposed.

By implementing erosion and sediment control BMPs, and implementing the other mitigation measures for surface resources, described above, OneCommunity will be able to construct the network with no significant adverse impacts on water resources.

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Biological Resources

The Project will result in minor impacts on biological resources. Noise and human activity associated with fiber installation are expected to disturb some wildlife species, but these effects will be minor and temporary, and will only occur during duration of construction. Some disturbance to the ground surface and vegetation will also occur during construction activities. This disturbance will be limited to previously disturbed roadway and utility ROWs.

OneCommunity consulted with the U.S. Fish and Wildlife Service (USFWS) regarding threatened and endangered species. The final USFWS correspondence, dated February 3, 2011, concurred with OneCommunity's ultimate finding that, with implementation of mitigation measures, the proposed action may affect, but is not likely to adversely affect, the Indiana bat, eastern prairie fringed orchid, eastern massasauga, and the bald eagle. The USFWS further concurred that the remaining Federally-listed species identified in the final EA will not be affected by the Project with implementation of the mitigation measures. The USFWS response letter also recommended that the proposed action avoid and minimize water quality impacts and impact to high quality fish and wildlife habitat, such as forests, streams, and wetlands.

OneCommunity will implement specific mitigation measures to ensure effects to Federally-listed species are avoided during proposed construction activities. To avoid effects to the *Indiana Bat (State and Federal Endangered)*, OneCommunity will not remove trees measuring greater than 3 inches in diameter at breast height (dbh). Should tree removal be required, OneCommunity will only remove such trees in the non-summer months, between 30 September and 1 April. To avoid adverse effects to the *Bald Eagle (State Threatened; Federal species of concern)*, OneCommunity will coordinate proposed construction activities in Tuscarawas and Portage Counties with the ODNR Division of Wildlife and the USFWS to ensure proposed work is conducted at least 1,220 feet (0.25 mile) from known bald eagle nests, and/or in a manner that minimizes potential effects to this species. No effects to known Bald Eagle nesting locations in Trumbull or Marion Counties are anticipated due to the nature and location of activities proposed. To avoid adverse effects to the *Eastern Massasauga (Federal species of concern)* and the *Eastern Prairie Fringed Orchid (Federal Threatened)*, OneCommunity will implement mitigation measures to avoid effects to surface waters and wetlands, areas which could provide habitat for these species. Implementation of the above measures will ensure that effects to Federal special status species during proposed construction activities will be avoided to the maximum extent possible, and that all potential residual effects are fully coordinated with the ODNR and the USFWS.

OneCommunity also coordinated with ODNR regarding potential impacts on State-listed biological resources. In a letter dated December 20, 2010, the ODNR presented a detailed analysis of the proposed Project and recommended additional protective measures within specific counties to prevent impacts to species of concern. OneCommunity will implement the county-specific mitigation measures identified in the EA for State special status species potentially affected by the Project. Based on this analysis and following the guidance of the

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USFWS and ODNR, OneCommunity will be able to construct the fiber network with no significant adverse impacts on biological resources.

Historic and Cultural Resources

On October 14, 2010, a consultation initiation letter, including a detailed project description, was sent by NTIA to the Ohio Historic Preservation Office (OHPO). On January 12, 2011, OneCommunity sent a follow-up letter and additional project information to the OHPO based on the analysis and findings presented in the draft EA, identifying that the proposed action will not adversely affect historic properties protected under Section 106 of the National Historic Preservation Act (NHPA). On February 8, 2011, OHPO replied in a letter to OneCommunity that OHPO was not able to concur with the No Adverse Effect finding and recommended further consultation with that office. Specifically, OHPO posed questions about the proposed hub sites, the amount of ground disturbance, the methodology employed (using GIS) to identify properties listed on the National Register of Historic Places (NRHP) and other historic properties, and use of a document identifying best management practices to be used during project implementation. OneCommunity continued consultation with OHPO and participated in conference calls and other communication to clarify specific requirements. Based on this continued consultation, OneCommunity amended the EA, identified hub site installation standards, clarified methodologies used to identify historic and cultural resources, and enhanced proposed construction practices and procedures.

The final OHPO response, dated February 23, 2011, concurred with OneCommunity's Conditional No Adverse Effect finding and outlined specific mitigation measures to be included in the EA and implemented by OneCommunity. The final EA has been updated to include all relevant data from OneCommunity's consultation with the OHPO that was used to support the OHPO's concurrence. OneCommunity will implement the following mitigation measures in accordance with the OHPO findings:

- During *all* proposed ground-disturbing activities, OneCommunity will monitor all ground-disturbing activities for inadvertent discoveries of cultural resources.
- During any proposed ground-disturbing activity *in the vicinity of known historic properties or suspected or known burials*, OneCommunity will ensure that an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards monitors ground disturbance.
- OneCommunity will utilize existing defined entry points and mounting points for wiring and equipment on any Proposed Action-involved structure.
- OneCommunity will utilize existing defined entry points and mounting points for wiring and equipment on any Proposed Action-involved structure. In areas where this is not possible, these points will be placed in locations that do not detract from the building's overall appearance. Should the equipment be visible on the structure, the equipment will be painted to match the color of the surrounding building materials.

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- OneCommunity will not anchor equipment directly into stone or brick on any structure; instead, OneCommunity will only use mortar joints for anchoring. OneCommunity will use rust-resistant mounts to prevent staining of the building materials, and reversible mounting techniques to avoid damage to building materials.
- When installing fiber or conduit underground at or near a structure, OneCommunity will consider the structural and foundation stability of the building, and will not conduct any new excavations adjacent to foundations that could undermine the structural stability of the building. OneCommunity will not alter the landscape and surrounding area of the structure in a way that could alter drainage patterns or cause water-related damage to the building.
- Where interior work within a structure is required, OneCommunity will utilize space in existing chases, closets, or shafts; install equipment and systems so that they pose no alteration to the building's floor plan and no damage to the building material; and install the vertical runs of conduit and cables in closets, service rooms, and wall cavities. OneCommunity will design a system that will require the least intrusion into the fabric of the building and that can be updated or altered without intervention into the wall and floor systems of the structure.
- As part of work in each structure involved with this Proposed Action (i.e., for work at each hub site), OneCommunity will provide to the OHPO after construction a brief report documenting the work that was performed, a statement that the mitigation measures were followed, and pre- and post-project interior and exterior photographs (with captions) documenting areas where all work was performed. This report shall be sent to the OHPO within 14 days after completion of all work in that structure.
- OneCommunity will adopt the best management practices (BMPs) as specifically provided by NTIA as the basis for the mitigation measures. OneCommunity will follow these when connecting cable to building and extending internal wiring and when attaching cable to structures such as bridges.
- When excavating trenches for buried cable, OneCommunity will exercise caution in the vicinity of known cemeteries, significant archaeological sites, and places specifically point out by interested parties that may contain sensitive below-ground cultural resources.
- If circumstances require construction methods not specified in the mitigation measures, then OneCommunity will initiate consultation with the OHPO to develop plans and treatment measures designed to minimize effects on historic properties.
- During consultation for a specific location, OHPO agrees that construction may continue throughout any remaining extent of the project that does not require consultation.

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- OneCommunity may initiate consultation with OHPO to consider ways to minimize effects at specific locations and/or OneCommunity may consult with OHPO concerning the NRHP eligibility of a specific property. OHPO will provide timely responses to proposals for alternative construction methods, but OneCommunity must submit complete and appropriate documentation with specific plans and recommendations.
- When consulting with OHPO concerning NRHP eligibility, OneCommunity will provide a comprehensive packet of documentation including mapping, photographs, date of construction, dates of modifications, description of the property, and sufficient background and context so that OHPO may understand the application of the NRHP eligibility criteria. OHPO does not have unlimited authority to determine eligibility and there may be delays in reaching consensus findings for some properties.
- The OHPO requests that OneCommunity provide documentation for OHPO acceptance at the completion of the project with before and after photographs showing external connections and internal wiring for any building older than 70 (seventy) years old (that is, built before World War II). The mapping should include appropriate data including mapping.
- OHPO agrees that excavating narrow trenches for buried cable along severely disturbed ROWs does not require archaeological survey. If construction for buried cable is required that will extend outside of well-defined public ROWs for more than short sections, then OneCommunity should consult with its professional archaeologist on the need for archaeological survey.
- OHPO agrees that extending aerial cable line along existing utility poles does not require further review by the OHPO for this undertaking. If new sections of aerial transmission lines are required that extend more than a short distance with placement of several new utility poles, then OneCommunity should consult with its Cultural Resource Management professional to determine if there are viewsheds and older buildings or structures that warrant further consideration.

Through the Tower Construction Notification System, NTIA provided Project details to nine tribes interested in the Project's geographical location (northeast Ohio), including the Keweenaw Bay Indian Community, Pokagon Band of Potawatomi Indians, Peoria Tribe of Indians of Oklahoma, Miami Tribe of Oklahoma, the Wyandotte Nation, Shawnee Tribe, Kickapoo Tribe in Kansas, Eastern Shawnee Tribe of Oklahoma, and the Ottawa Tribe of Oklahoma. All nine tribes indicated that they have no documentation concerning or are unaware of the presence of cultural or sacred resources in the project area; that they have no interest in this project; and/or they have no objection to the project. All nine tribes also requested that if any human skeletal remains or any protected Native objects are uncovered during construction, construction should stop immediately, and state and tribal representatives should be contacted. One tribe, the Wyandotte Nation, added that they will like to be contacted if OHPO requires any additional archaeological surveys for this project so they could have the opportunity to review the survey methodologies and findings.

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All construction will be restricted to previously disturbed areas. If any cultural material is discovered during construction, the SHPO will be notified immediately and all activities halted until a qualified archaeologist assesses the cultural remains. If any human skeletal remains or protected Native objects are uncovered during construction, construction will stop immediately, and all consulting parties will be contacted. Based on these consultations and guidance from the commenting agencies, the Project is not expected to have significant adverse impacts on historic and cultural resources.

Aesthetic and Visual Resources

The Project will cause no impacts to aesthetic and visual resources or scenic quality in the area. The Project is limited to disturbed utility ROWs and will cause minimal changes within the viewshed as a result of installation of up to 21 new utility poles over a distance of up to 0.6 miles. The areas proposed for installation of the new utility poles have already been disturbed and developed for commercial and/or residential uses and include existing, disturbed roadside utility ROWs. The visual characteristics of these areas are consistent with commercial and/or suburban residential areas. Installation of up to 21 new utility poles in these areas will not have an effect on the aesthetic or visual resources of these locations. No aesthetic or visual resource effects to parks, historic structures or districts, scenic rivers, or any other sensitive visual resources will occur during either construction or operation. Accordingly, the Project is not expected to have a significant adverse impact on aesthetic and visual resources in the Project area.

Land Use

The Project will cause no impacts to land use within the area. The Project's fiber route will be installed in existing transportation or utility ROWs, and is consistent with and will support the current land uses within the area. The Project will not produce any land use effects, nor will it directly or indirectly result in a significant change of land use from existing conditions. Areas proposed for installation of up to 21 new utility poles include previously disturbed, roadside utility ROWs; no alternation in land use will occur due to the proposed installation of new utility poles. Any economic or other development fostered by the Project will be anticipated to occur in consonance with local long-range plans (e.g., community comprehensive plans or general plans) and zoning regulations. As such, neither construction nor operation of the Proposed Action will result in significant adverse impact on land use.

Infrastructure

Project construction activities will result in short-term, temporary impacts to infrastructure in the area. The Project will cause a temporary interruption of traffic flow along the Project route. These interruptions are short-term and will subside when installation of the fiber is complete. OneCommunity will implement routine traffic control measures to minimize required road closures, to ensure traffic is maintained at acceptable levels, and to minimize public health and safety risks during construction. Other impacts to transportation resources will be avoided through the use of directional boring to install fiber beneath existing resources where the proposed route crosses such resources. OneCommunity will work with the Ohio Department of

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Transportation (ODOT), the owners of specific infrastructure resources, and local governments on specific crossings and will submit detailed engineering diagrams of where fiber is proposed to be placed. Also, OneCommunity will ensure no impacts to existing utilities infrastructure by contacting the Ohio Utilities Protection Service (OHPS) prior to construction to identify the locations of existing sub-surface utilities. Overall, the Project will have a positive impact on infrastructure in northeast Ohio and will have no significant impacts on infrastructure.

Socioeconomic Resources

The Project will provide improved communications infrastructure to residents who do not have access to broadband services in northeast Ohio. The network will also benefit these communities by providing broadband capabilities many Community Anchor Institutions. An increase in both short-term and long-term employment opportunities are also anticipated as a result of the Project. The Project will have positive impacts on socioeconomic resources and will have no significant impacts on socioeconomic resources.

Human Health and Safety

Many potentially hazardous waste sites were identified in the study area. However, none of the potentially hazardous waste sites occur within the areas proposed for ground disturbance. Also, because the cable will be installed in existing transportation and utility ROWs, contact with contaminated soil or water is unlikely. OneCommunity will monitor all proposed activities involving ground disturbance for odors, suspicious soils or leachate, solid waste, or other conditions indicating the potential for contamination. If any such potential contamination were discovered, OneCommunity will immediately stop work in the area, cordon off the location, and contact the local district office of the Ohio Environmental Protection Agency (OEPA). Further work in the suspect location will not resume until authorization is granted by OEPA.

Hazardous materials and wastes will not be generated, transported, treated, or stored as a result of this Project. OneCommunity will properly dispose of any removed utility poles. To minimize the potential for release of hazardous materials and wastes to the environment during construction, OneCommunity's contractors will maintain all construction equipment per the manufacturer's recommendations, and will limit construction activity to the minimum amount of time required. OneCommunity also will develop and implement a spill prevention plan for all proposed project activities to minimize environmental effects in the event of a spill or break in an equipment hydraulic line that may discharge into waters of the State.

OneCommunity will ensure human health and safety, including that of both the general public and construction workers, during the proposed construction activities by following their Corporate Health and Safety Manual. OneCommunity also will implement routine traffic control measures to minimize public health and safety risks during construction. As such, neither construction nor operation of the Proposed Action will result in significant adverse impact on human health and safety.

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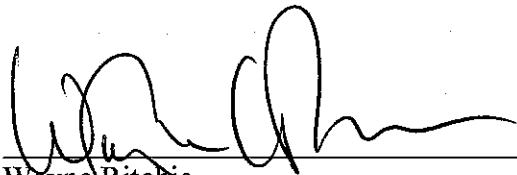
Cumulative Impacts

As described above, the Project will not have significant adverse impacts on any of the environmental resource areas evaluated in the EA. Potential indirect and cumulative impacts of the proposed project include population growth and secondary development. Such beneficial impacts are consistent with the purpose and need of the Project. Also, future growth and development, and any associated changes in land use patterns and densities could be managed through local zoning ordinances and land use planning. As such, no cumulative impacts on the environment are anticipated.

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

3/15/2011
Date