National Telecommunications and Information Administration
Broadband Technology Opportunities Program
Finding of No Significant Impact
University of Arkansas System
Arkansas Healthcare, Higher Education, Public Safety, and Research
Integrated Broadband Initiative Project

Summary

The University of Arkansas System (U of A System) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to build a 900-mile network expansion to enhance the capabilities of two existing community-serving networks: the Arkansas Telehealth Oversight and Management (ATOM) network and the Arkansas Research and Education Optical Network (ARE-ON). To complete this expansion, the U of A System will lease 850 miles of existing fiber and construct 50 miles of new fiber optic cable. The new cable will be installed to tie into the existing leased fiber and reach 26 community anchor institutions (CAIs). No new construction is needed to directly connect the remaining 448 CAIs to the networks. Fiber cable will primarily be installed underground in rights-of-way (ROWs) along roads, under paved urban streets, along private easements, or attached to existing bridges. The U of A System will also install 18 new fiber equipment shelters. Once complete, the integrated network will serve every county in the State, every State-supported four-year university, 22 two-year colleges, and numerous hospitals, medical centers, public libraries, first responders, and other public safety entities across the State. New or upgraded telecommunications equipment will be installed in existing electronics rooms at each of the participating CAI locations. This Project is referred to as the Arkansas Healthcare, Higher Education, Public Safety, and Research Integrated Broadband Initiative (Project).

The National Telecommunications and Information Administration (NTIA) awarded a grant for the Project to the U of A System 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.

The U of A System completed an EA for this Project in May 2011. NTIA reviewed the EA, determined it is sufficient, and adopted it as part of the development of this FONSI.

The Project includes:

- Leasing 850 miles of existing fiber throughout the State of Arkansas from independent internet service providers;
- Installing 50 miles of new underground fiber optic cable to connect with existing network infrastructure and reach 26 of the 474 identified CAIs;
- Installing handholes every 2,400 feet and manholes at intervals of 1,500 to 2,500 feet along the new fiber route;
- Installing new or upgraded telecommunications equipment in existing electronics rooms at each of the 474 CAI locations along the Project route; and
- Erecting 18 new fiber equipment shelters along the network route.

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

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

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Purpose and Need

The purpose of this Project is to expand capabilities and geographic reach of broadband services throughout the State of Arkansas. The Project will enable high-speed delivery and transmission of broadband benefits to 474 CAIs that currently lack sufficient bandwidth and equipment to support Arkansans in the areas of healthcare, higher education, public safety, and research. Nationally, Arkansas ranks 46th in percentage of households with broadband access, and more than half the State's counties are in the Mississippi Delta, the most distressed area of the nation. CAIs will receive bandwidth upgrades, interactive video equipment, and/or public computers, based on their needs. The Project will enhance telemedicine (e.g., interactive video clinical consultations, health information exchange, electronic medical recordkeeping); distance education and research opportunities; reliable public safety responses to catastrophic, bioterrorist, and other emergency events; and community access to the internet and associated opportunities.

Project Description

This Project includes a combination of leasing existing fiber and constructing new fiber infrastructure where needed. Approximately 850 miles of existing fiber will be leased from regional internet service providers and 50 miles of new fiber optic cable will be installed to expand U of A System networks from Memphis to Dallas, Memphis to Tulsa, North Little Rock to Monroe, Alma to Fayetteville, and Widener/Forrest City to Jonesboro. The new fiber will be installed to connect previously unserved cities to existing telecommunications infrastructure and to reach 26 of the identified CAIs. No new fiber will be necessary to connect the remaining 448 CAIs associated with this Project. Upgraded electronics, such as computers or routers, will allow the remaining 474 CAIs to connect to the new network. This cable will be installed within existing road ROWs, under previously disturbed asphalted or landscaped areas, or within easements across private property. Network backbone fiber will be installed using boring, plowing, trenching, or bridge attachment methods. Fiber laterals will be installed using horizontal directional boring or open trenching.

Horizontal directional boring will be used to install approximately 80% (40 miles) of the new fiber. This technique will be used for the Project's inter-city and last mile construction (including when crossing streams, waterways, and some rivers). Bore entry and exit pits measuring approximately 10 by 20 feet will be excavated at roughly 500-foot intervals. In reasonably flat areas with few existing utilities and favorable soil conditions, vibratory plowing may be used to install the conduits. This method creates an opening in the ground surface approximately 3 inches wide and "plows" the conduit into the subsurface at a depth of 3 feet. Surface disturbance from plowing is limited to a width of approximately 6 inches. It is estimated that approximately 15% (7.5 miles) of the new conduit will be installed using plow methods. It is also estimated that approximately 5% (2.5 miles) of the new conduit in some last mile locations will be installed using trenching methods. These areas will require 50 to 100 linear feet

of trenching. Using this method, a standard utility backhoe will excavate a trench approximately 16 inches wide and 3 feet deep. The conduits will be placed at the bottom of the trench, fiber will be pulled through or blown into the conduit, and soil will be backfilled and compacted into the trench. Attachment of fiber optic cable to bridges will be accomplished by drilling holes into the concrete exterior of the bridge structure on either side of the pipe and using metal pipe straps to attach a 4-inch steel pipe to the exterior portion of the bridge, generally under the roadway superstructure. Fiber and high density polyethylene (HDPE) conduits will then be installed within the steel pipe.

Fiberglass reinforced polymer plastic or concrete handholes will be placed approximately every 2,400 feet along the new fiber route. Installation of the handholes will require an excavation approximately 5 feet long, 4 feet wide, and 5 feet deep. After installation, 12 inches of soil will be placed on top of the handhole, so that they are not visible from the ground surface. In urban areas where the conduit must be designed and placed beneath existing streets, manholes will be installed at intervals of 1,500 to 2,500 feet (depending on the number of 90-degree bends in the routing). Manholes will require an excavation 6 feet wide by 6 feet long by 6 feet deep. It will not be necessary to clear and grub the ROW prior to construction because of the low impact construction methods that will be used. At handhole locations, and at bore entry and exit points, it will be necessary to clear the vegetation. Where plowing, it may be necessary to roll down the vegetation in advance of the installation, but this should allow the vegetation to recover quickly and greatly reduce exposed soil. Final grading will restore the ground to its original contours and condition. Any pavement removed or damaged during construction will be repaired or replaced.

Under this Project, U of A System will install fiber optic equipment in existing equipment buildings and in 18 new prefabricated equipment shelters. These shelters will be installed at 15 college campuses, and on previously developed properties in the cities of Hindsville, Malvern, and North Little Rock. Most of the shelters will measure 12-16 feet wide by 30 feet long, but larger shelters measuring 24 feet by 30 feet will be installed in North Little Rock and Fayetteville. Each shelter will be placed on a 50-by-50-foot easement, surrounded by an 8-foot security fence, connected to existing utility and roadway infrastructure, and provided with a standby, natural gas–powered generator.

Connections to CAI buildings will be made via existing conduits to the extent that they exist and are usable. Where existing conduits are unavailable, building entries will be made by drilling into the building exterior wall, running vertical conduit along the building wall from the ground to the wall penetration location, and placing a pull box over the building penetration point. Interior building design changes are not anticipated, as conduit will be placed into existing utility chases and equipment will be installed within existing computer/electronics rooms. New or upgraded telecommunications equipment will be placed into each shelter, and will be provided to

the 474 CAIs participating in this network expansion. This equipment may include computers, interactive video equipment, routers, and switches

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 – Underground Fiber Installation (Preferred Alternative). This alternative would involve leasing existing underground fiber infrastructure and installing new fiber, primarily underground, to complete the network expansions as discussed above. Short sections of the fiber route will pass through conduit attached to existing bridges. This alternative also includes installation of 18 fiber equipment shelters and new or upgraded telecommunications equipment at 474 identified CAIs.

No Action Alternative. No action was also considered. This alternative represents conditions as they currently exist in the Project area. Under the no action alternative, the U of A System network expansion would not be constructed, and telecommunications needs in the State will continue to be unmet. The EA examined this alternative as the baseline for evaluating impacts relative to other alternatives being considered.

Alternatives Considered But Not Carried Forward. The University of Arkansas examined the possibility of installing aerial fiber or partially constructing the system using aerial installation. However, aerial cable is susceptible to outages during storm events caused by falling tree limbs and branches, excessive ice buildup, or strong wind. In addition, compared to buried cable, aerial cable is much more susceptible to temperature-caused signal degradation. In addition, use of existing aerial fiber optic facilities would require leases with local utilities that restrict the rights of the fiber owner. For these reasons, installation of aerial fiber optic cable was not considered feasible to meet the purpose and need of the Project and was, therefore, eliminated from further consideration. Various wireless internet technologies were also evaluated as an alternative to the buried fiber optic network. Wireless data transport does not have the carrying capacity required to meet the needs of participating CAIs. Although construction of wireless facilities may initially result in a larger service area, these systems are not capable of providing an acceptable level of service to address the purpose and need of this Project. Consequently, this alternative was also eliminated from further consideration.

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

The Project will result in minor, temporary increases in ambient noise levels during the construction phase. Cable installation activities will be conducted primarily within existing roadway ROWs where noise levels are generally high because of traffic. Noise-sensitive receptors that could be affected by construction noise include residences, hospitals, libraries, and parks. However, it is unlikely that construction will last longer than 1 to 2 days in any single location along the planned Project route. Moreover, the construction contractor will employ noise-reducing construction practices including the use of sound control devices (e.g., mufflers) and noise-reducing enclosures. There is no noise associated with operation of the network, except for minor and intermittent noise associated with operation of emergency generators during power outages and periodic system testing. No residences are located within 180 feet of any of the equipment shelters where the generators will be installed. Based on these assessments, no significant noise impacts are expected to occur because of this Project.

Air Quality

Temporary impacts to air quality may result from airborne dust and diesel fuel emissions associated with use of construction equipment. However, these emissions will be of short duration and distributed among numerous locations statewide. Based on the installation methods selected, construction emissions are expected to be lower than those resulting from typical road construction projects of similar linear scope. Air quality impacts would be minimized through proper operation and maintenance of all construction equipment and implementation of effective dust management practices during ground disturbances. Emergency generators installed in the equipment shelters will also result in air pollutant emissions. However, because these generators will only operate during power outages and system testing (once per week for 20 minutes), the volume of such emission is expected to be limited.

Construction and long-term operation of the U and A System network expansion will result in the release of approximately 1,698 metric tons of carbon dioxide-equivalent emissions. This estimate is well below the Council on Environmental Quality's presumptive effects threshold of 25,000 metric tons of carbon dioxide equivalent emission from an action. In addition, Crittenden County, Arkansas has been designated as a maintenance area with regard to National Ambient Air Quality Standard (NAAQS), and the State has promulgated a maintenance State

Implementation Plan for the county. Construction and operation emissions associated with the Project in Crittenden County will fall well below the general conformity *de minimis* emission levels of 100 tons per year of oxides of nitrogen or volatile organic compounds.

Based on these assessments, no significant impacts to air quality are expected to result from this Project.

Geology and Soils

No significant impacts on geology or soils are expected because of Project implementation. Most new construction will be limited to previously disturbed existing road ROWs or existing utility easements. Moreover, the selected conduit and fiber installation methods will result in minimal ground disturbance and maintenance of the in-situ soil profile. Final grading will restore the ground to its original contours and condition. Nevertheless, ground-disturbing activities will result in the temporary loss of vegetation and potential soil erosion. These areas will be limited and best management practices (BMPs) will be implemented to ensure that soil erosion is not excessive.

Farmland exists near three Project segments. Row crops are located adjacent to approximately 600 feet of fiber in the area designated as West Memphis – South. In the area designated as Hope – East, approximately 600 feet of fiber will be installed adjacent to pasture, and approximately 1,500 feet of fiber will be installed adjacent to a grassland field. In the area designated as Forrest City – East, approximately 1,400 feet of fiber will be installed through an active orchard, but is not expected to affect the trees. No tree removal will be required and these farmland soils will not be permanently affected. Project implementation will not result in conversion of farmland to non-farm use.

Based on these assessments, the Project is not expected to result in significant adverse impacts on this resource area.

Water Resources

The planned Project route crosses 10 perennial streams, 22 intermittent streams, and 17 ephemeral drainages. All surface water crossings will be completed using horizontal directional boring or bridge attachments to avoid disturbing rivers and streams. No Project-related ground-disturbing activities will be conducted in the waterways or within 50 feet of any stream or river. No navigable waters will be crossed by the Project and, accordingly, a U.S. Army Corps of Engineers (USACE) Section 10 permit is not required. Ground-disturbing activities may have the potential to affect surface water resources by increasing the amount of sedimentation discharged to nearby rivers or streams. BMPs for sediment and erosion control will be implemented, including use of temporary silt or straw bale fencing and permanent seeding of disturbed areas.

Because the fiber will be installed at shallow depths (approximately 3 feet), and because no significant groundwater sources are present at such limited depths, adverse effects on groundwater are expected to be negligible. Additionally, the Project will have no impact on wetlands. All wetlands will be avoided by directional boring and no structures will be placed in wetlands. The construction plan requires directional bore drilling to start and end at least 30 feet outside the limits of the wetland. Furthermore, because there will be no work within wetlands, a USACE Section 404 permit is not required. Multiple floodplains will be crossed by the planned Project route, but fiber optic cable will be installed below grade and will not result in substantial fill or other grade modification. No fill will be placed in any FEMA-designated floodplain, no floodplain capacity will be lost, and areas upstream and downstream of a floodplain crossing will not experience changes in flood flows. No equipment shelters will be placed in floodplains. Based on these considerations, and through implementation of appropriate construction methods and BMPs, the Project is not expected to have significant impacts on water resources in the region.

Biological Resources

Two Federally-listed species, the Florida panther (*Puma concolor*) and the interior least tern (*Sterna antillarum athalassos),* were identified as occurring or potentially occurring along the Project route in Jefferson County, Arkansas. In a letter dated May 4, 2011, the U.S. Fish and Wildlife Service (USFWS) concurred with the U of A System's determination that the Project will have no effect on listed species and is not likely to have significant adverse impacts on non-listed fish and wildlife resources. This determination was based on the fact that the planned expansion of fiber and communication facilities generally follows established ROWs that have previously been disturbed and are located within or adjacent to developed areas throughout the State of Arkansas. Nevertheless, the Project has the potential to temporarily affect wildlife, including migratory birds, and their habitats due to ground-disturbing activities, noise from construction equipment, and the presence of construction crews. The construction contractor will avoid sensitive areas by using directional boring to install fiber beneath critical surface features and/or making minor alignment adjustments (e.g., changing to the other side of a road). Where large nest colonies, rookeries, or bald eagle nests are identified and alignment rerouting is not feasible, disturbance of nesting birds will be avoided by timing construction in these areas to occur outside the nesting season or at a time when project-related disturbances are not anticipated to result in nest abandonment. Finally, no significant tree or vegetation removal is planned. Based on these assessments, no significant adverse impacts on biological resources are anticipated to result from Project implementation.

Historic and Cultural Resources

NTIA initiated Section 106 consultation with the Arkansas State Historic Preservation Office (SHPO) on September 22, 2010. On January 20, 2011, the U of A System initiated their own

Section 106 consultation process with the SHPO. On March 7, 2011, the SHPO requested that a Cultural Resources Survey be completed for this Project. U of A System provided the Phase I Cultural Resources Survey Report to the SHPO for review on April 8, 2011. A pedestrian survey carried out by Panamerican, on behalf of the U of A System, identified one prehistoric archaeological site within the Project area: site 3HE68 located in the area of Hope, Arkansas. This site does not appear on the National Register of Historic Places (NRHP), but is very likely eligible for placement on the NRHP. To avoid adverse effects on this resource, the site will be flagged and avoided during construction.

Three previously unrecorded historic-era cemeteries were also identified within the Project area: the West Cemetery on Poor Farm Road near Morrilton, the Stuckey Cemetery near Fayetteville Route 3, and the Cavalry Cemetery on Fort Smith Route 1. To avoid adverse impacts on these resources, fiber optic cables will be installed on the opposite side of the roadways from the cemeteries. Three historic properties located within the Project area in Little Rock have been categorized as being potentially eligible for inclusion on the NRHP due to their architectural properties: the Center Mission Church of God in Christ building, the fire station on South Pulaski Street, and the West Side High School. The selected fiber installation techniques will avoid disturbing these three historic properties, and no equipment shelters are planned for this area. Thus, proposed activities should have no adverse effects on these resources.

In a letter dated May 4, 2011, the SHPO concurred that the Project would have no adverse effect on historic properties, provided that an archaeologist monitor construction activities near archaeological site 3HE68 and the three identified historic cemeteries.

On October 1, 2010, NTIA notified 13 Native American tribes of the Project through the Tower Construction Notification System (TCNS). As of May 16, 2011, five responses have been received. The Peoria Tribe of Indians of Oklahoma, the Shawnee Tribe of Oklahoma, and the Delaware Nation have indicated no interest in the Project. The Osage Nation representative requested and received more information on the Project via telephone on April 11, 2011. No further correspondence from the Osage Nation has been received to date. On April 20, 2011, the Choctaw Nation of Oklahoma requested a copy of the Arkansas SHPO's determination. On May 11, 2011, the Choctaw Nation of Oklahoma concurred with the SHPO's determination that this Project will have no adverse effect on historic properties. Nevertheless, if construction-related ground-disturbing activities uncover cultural materials (i.e., structural remains, historic artifacts, or prehistoric artifacts), all work will cease and interested Tribes, the SHPO, and NTIA will be notified immediately. If ground-disturbing activities uncover human remains, all work will cease immediately, the area around the discovery will be secured, and the relevant law enforcement personnel (e.g., local police or county coroner) and NTIA will be notified immediately.

Based on completed cultural resources reviews and consultations, the Project is not expected to have significant adverse impacts on historic or cultural resources.

Aesthetic and Visual Resources

The Project is expected to have short-term, minor visual and aesthetic impacts during the construction period due to the presence of construction equipment, vehicles, and minor land disturbances. These impacts will be similar to visual impacts related to typical maintenance activities along roadsides. Long-term visual impacts associated with the fiber itself will be minimal based on planned installation underground and within existing utility corridors. Visual and aesthetic impacts associated with the equipment shelters will be permanent, but minor. These shelters will generally be placed in developed areas with close access to an existing road. The Project will have no impact on the four rivers listed in the Arkansas Natural and Scenic Rivers System or any of the numerous national forests, national parks, Federally designated wildlife refuges, or wilderness areas in the State. However, the planned Project route is adjacent to portions of Crowley's Ridge Parkway National Scenic Byway, and adjacent to and across portions of the Great River Road National Scenic Byway and the Interstate 530 Scenic Byway. Construction will result in temporary impacts to the visual quality of these areas. Long-term impacts to the visual quality of these and other areas along the Project route will result from the permanent presence of ROW markers at each handhole location. Marker poles are typically 5 feet tall, made of white plastic with orange caps, and have appropriate identifying information. These markers will have minimal visual impacts. Based on these assessments, this Project will not significantly affect aesthetic or visual qualities in the region.

Land Use

The Project is not expected to adversely affect existing land uses in the area because most of the new fiber will be located along existing secondary roadway ROWs and highways. In all cases, installation of fiber optic cable is consistent with the current land use designations. Additionally, the planned equipment shelters will be installed on parcels of land currently improved with commercial buildings and used by educational facilities around the State. Some temporary disruption of land use may occur during construction, but long-term land uses will not change. All excavated areas will be restored to their original condition. No significant adverse impacts on land use are anticipated because of this Project.

Infrastructure

The U of A System Project will bring high-speed internet and communications connectivity to underserved areas of Arkansas. The current lack of communications infrastructure results in public health and safety concerns, as well as inadequate and unreliable internet service for schools, government agencies, residents, and business owners. By providing necessary telecommunications infrastructure, the Project will have a beneficial effect on the State. The existing roadway infrastructure in the State is adequate for the types of vehicles and equipment

that will be required to complete the Project. Each of the 18 planned equipment shelters will be connected to existing utility and roadway infrastructure; no concerns have been identified with regard to these connections. Overall, the Project will have a positive impact on infrastructure in Arkansas.

Socioeconomic Resources

This Project will provide broadband services and associated opportunities to the currently underserved communities in Arkansas. Implementation and operation of the expanded networks will generate opportunities for increased employment and enhanced opportunities for clinical consultations, distance education, research, and virtual communication. No disproportionately high or adverse human health and environmental effects are expected to result from the Project. Overall, the Project is expected to have a positive impact on socioeconomic resources in the region.

Human Health and Safety

Because Project construction involves ground disturbance, hazardous wastes or contaminated water and soil may be encountered. Two Superfund sites are located within 5 miles of Project route. Directional drilling minimizes soil disturbance and the potential for contact, and would not significantly redistribute contaminated soils. Similarly, vibratory plowing preserves the existing soil profile and does not result in exposure of contaminated soils. Installation of handholes for splices in areas of soil contamination may necessitate appropriate offsite disposal of soil. Known contaminated sites will be identified on the Project plans to alert workers of the presence of such sites. Soils will also be identified as potentially contaminated if they differ visually from surrounding soil or if the smell of petroleum products is detected. Upon identification of potentially contaminated soils, work will cease in the area and a soils contamination consultant will conduct an investigation to determine the presence and extent of soil contamination. Workers will then be equipped with appropriate personal protective equipment in accordance with Occupational Safety and Health Administration (OSHA) standards.

Because much of the planned work will be conducted adjacent to high-speed traffic along public highways and county roads, worker and motorist safety is of paramount concern. Arkansas State Highway and Transportation Department (AHTD) standards will be used to establish and maintain a safe work zone, including provisions relating to worker visibility, signage, and safe pedestrian routes. Work in and around school zones will be coordinated with school district officials to ensure that safe, functional routes are available for pedestrian and bus traffic. A traffic control plan will be adopted for the Project that details standard traffic control and flagging measures to be implemented around construction sites. Adherence to the plan will minimize any potential impacts, such as vehicular accidents in construction zones, and will reduce the impact of construction on the traveling public.

Based on these considerations, human health and safety are not expected to be affected significantly by construction activities. In the long term, the Project will benefit the medical facilities in the State by enabling them to provide richer, more diverse services to the communities.

Cumulative Impacts

Two projects were identified as having the potential to cause a cumulative impact when combined with the impacts of the planned U of A System Project. Connect Arkansas, a private nonprofit organization, is implementing a community-based initiative to promote internet access and education. Through the Breaking Boundaries with Broadband Program, Connect Arkansas works with existing community programs and creates programs to promote increased internet use and ownership of computer devices. The U of A System Project, in combination with the goal of Connect Arkansas, will create a positive socioeconomic impact by increasing overall computer access in Arkansas. AHTD has planned numerous, smaller-scale surface treatment and road maintenance activities throughout the State, including along portions of the planned network route. The combination of these projects could potentially affect traffic safety and create delays on the network of local, arterial, and collector roads that comprise much of the existing transportation system in the area. There would be potential cumulative impacts on noise and health and safety because of construction and maintenance along existing road ROWs. These cumulative impacts would be minor and temporary. No significant adverse cumulative impacts will result from concurrent implementation of these projects.

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:

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