National Telecommunications and Information Administration
Broadband Technology Opportunities Program
Finding of No Significant Impact
Silver Star Telephone Company, Inc.
Wyoming Loop Completion Projects

Summary

Silver Star Telephone Company, Inc. (SST) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to install approximately 102 miles of buried fiber optic cable to complete existing fiber networks in northwestern Wyoming. The Teton Pass Segment includes installation of approximately 36 miles of buried fiber optic infrastructure between Jackson, Wyoming and the Wyoming/Idaho border and will complete an existing 159-mile fiber optic network in this area. The Togwotee Pass Segment includes installation of approximately 66 miles of buried fiber optic infrastructure needed to complete an existing loop connecting the cities of Jackson, Evanston, Green River, Rock Springs, Rawlins, Laramie, Cheyenne, Casper, Riverton, and Dubois. The completed networks will provide internet service opportunities to 57 community anchor institutions (CAIs) along the two planned route segments. The proposed actions are located entirely within Teton County, Wyoming and are referred to as the Wyoming Loop Completion Projects (Project).

The National Telecommunications and Information Administration (NTIA) awarded two grants for the Project to SST 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.

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

The Project includes:

- Installing approximately 102 miles of buried fiber along two route segments across Teton County, Wyoming;

- Installing the buried cable using plowing, horizontal directional boring, and micro-ducting techniques;
- Constructing two telecommunications huts and two cabinets along the route to house electronics equipment and facilitate data transfer;
- Providing the two telecommunications huts with emergency power generators, fuel tanks, and heating, ventilating, and air conditioning systems;
- Providing service opportunities for 57 CAIs along the planned route segments via direct connection to the new completed networks.

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 2830B
1401 Constitution Avenue, NW
Washington, DC 20230
Tel. 202-482-4208
Fax 202-501-8009
Email FMonteferrante@ntia.doc.gov

Purpose and Need

The purpose of this Project is twofold: (1) to close an existing fiber optic gap over Teton Pass to complete an existing network loop that currently runs through Wyoming and into Idaho, and (2) to close an existing fiber optic gap between Jackson and Togwotee Pass to complete a major intra-Wyoming network loop. This Project will create redundancy and ensure reliable broadband services for 57 CAIs in Teton County, including national security agencies, safety and law enforcement, schools, libraries, and 911 emergency systems. This Project will also provide infrastructure sufficient to allow for future expansion of the network should that become necessary.

Project Description

This Project will install approximately 102 miles of buried fiber optic cable on two route segments over the Teton and Togwotee passes in northwestern Wyoming. Installation of the cable will involve placement of two 1.25-inch plastic conduits along the entire length of the route segments at a depth of 36 to 48 inches below the ground surface. Nearly all of the fiber line will be installed within existing rights-of-way (ROW) or utility easements, but some fiber will also be installed in unpaved gravel and dirt back roads, trails, and pathways. After burial, fiber optic cable will be inserted into one of the conduit lines by air compression; the extra conduit will support potential future expansion. A special track-driven machine with vibrating plow tooth will be used for the majority of conduit installation, but a wheel-driven machine may be used on a case-by-case basis to minimize surface impacts. Rivers, streams, and creeks will be crossed by attaching a 4-inch metal conduit on the underside of existing bridges, or using directional boring equipment to insert the conduit at least three feet under the bed of the water course. Wetlands with moving or standing surface water will also be traversed by directional boring under the wetland without the need to disturb soils or create a trench. To accommodate horizontal drilling equipment, SST will excavate entry and exit pits approximately 3 feet wide, 6 feet long, and 3 to 4 feet deep at the beginning and ending of each section being bored. Lastly, in some locations, a small micro-excavator will be used to work around individual trees or very tight areas to avoid cutting trees or creating other impacts to the soil or existing facilities. Micro-ducting may also be used in urban settings within the Town of Jackson. Standard construction equipment such as cable plows, backhoes, excavators, boring equipment, trucks, and rock saws will be used for fiber installation.

Electronic transport equipment will be installed in existing rack space in existing buildings and in two new telecommunications huts, which will be constructed as part of the Project (a 10' x 16' unit on the Togwotee Pass, and a 12' by 20' unit in Moose or Moran, Wyoming). Each hut will be equipped with an emergency power generator, a diesel or propane fuel tank, and heating, ventilating, and air conditioning equipment to maintain climate in the building. Two equipment cabinets (41" wide by 27" deep by 60" high) will also be installed as part of the Project. Small, buried hand hole boxes that project 4 to 6 inches above grade will be installed at 10,000- to 15,000-foot intervals along the ROWs or as needed to join cable sections and provide opportunities for services at 57 CAIs.

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 – Buried Fiber Installation (Preferred Alternative). As noted in the Project Description, this effort will include installation of approximately 102 miles of fiber. Nearly all of this new infrastructure will be buried within existing ROWs and utility easements for the

Wyoming Department of Transportation (WYDOT), the Town of Jackson, and Teton County, as well as easements crossing land managed by the U.S. Department of Agriculture, Forest Service (USDA-FS), National Park Service (NPS), and the Jackson Hole Land Trust. The buried cable will be installed by plowing or horizontal directional boring to avoid surface impacts. The route of the Preferred Alternative was designed after informal coordination with most of the other agencies consulted, and through trial of approximately 20 other routes considered.

No Action Alternative. No action was also considered. Under the No Action Alternative, fiber optic cable would not be installed on either route segment, and existing gaps in service would remain. The No Action Alternative would not meet the purpose and need for the Project. The EA examined this alternative as the baseline for evaluating impacts related to other alternatives being considered.

Alternatives Considered But Not Carried Forward. SST considered the alternative of installing a wireless telecommunications network. However, many microwave towers would be needed to fulfill the purpose and need for this project. These facilities are very visible and require annual or more frequent maintenance. The unreliability of microwave towers compared to buried state-of-the art fiber optic cable is well documented, and microwave technology does not support the bandwidths required to fulfill the needs of the Project. SST also considered installing an all-aerial network, even though SST does not install or maintain aerial fiber optic facilities. The lack of reliability and potential problems with aerial cable in high wind, heavy snow, and remote areas is well documented. Furthermore, additional aerial installation in sections of the route where power poles currently exist was rejected because the purpose and need for this Project calls for an "extra" conduit suitable for potential future expansion that would not have additional impacts.

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 and Recreation, Infrastructure, Socioeconomic Resources, and Human Health and Safety.

Noise

Construction activities associated with the Project will cause short-term noise effects in the immediate vicinity of the Project area, including on identified sensitive receptors such as residences, schools, and medical facilities. However, these sensitive noise receptors are commonly located either within the Town of Jackson or other urban settings along the route segments. Ambient noise levels in such locations are generally higher than in more rural settings; consequently, construction noise will be less noticeable and less apt to cause adverse impacts on these receptors. Operation of the new fiber lines for data transmission will not result in any permanent change to ambient noise levels in the area. However, emergency power

generators and climate control units at the new huts will generate intermittent noise over the long term. The generators will be activated only in the event of a power failure and in the course of routine maintenance. The heating, ventilating, and air conditioning units will operate only as needed to maintain appropriate climate within the building. Based on this evaluation, the Project is not expected to have significant adverse impacts on noise.

Air Quality

Most of the planned fiber route is located along existing highway ROWs or other areas that routinely experience air pollution from transportation and agricultural activities. Fugitive dust and air pollutant emissions generated during Project construction and maintenance will be temporary and limited in duration. To reduce the potential for air quality impacts, the Project will include best management practices (BMPs) such as re-establishing ground cover, maintaining truck and equipment engines in good running condition, and limiting vehicle speeds on unpaved roads. Operation of the cable for data transmission will not create any additional permanent sources of air emissions.

It is estimated that the Project may add approximately 45.4 metric tons of carbon dioxide (CO_2) equivalent to the environment during the construction period. Production of greenhouse gases will drop dramatically after the construction period, being limited in the long term to minor emissions associated with periodic operation of the emergency power generators and air conditioning units at the two huts. Thus, the estimated quantity of emissions from this Project will be significantly lower than the Council on Environmental Quality's presumptive effects threshold of 25,000 metric tons of CO_2. Given the temporary nature of installation, and the limited impacts during operation, no significant impacts on air quality will result from implementation of this Project.

Geology and Soils

Given the limited depth of fiber installation and SST's intention to contain new installation within previously disturbed ROWs and utility easements as much as possible, this Project is not expected to alter geologic resources or soil. Disturbance related to the plow blade is limited to a width of about one foot or less in good soils that are free of large rocks. The total amount of soil disturbance to occur under this Project will be approximately 12.2 acres. Accordingly, this Project will create little to no erosion potential along either of the two planned route segments. BMPs will be implemented when installing cable in existing gravel roads or trails that have limited vegetation or are otherwise vulnerable to erosion. No long-term impacts are expected on geology and soils. Therefore, the Project is not expected to have any significant adverse impacts on geology and soils.

Water Resources

The planned route segments cross several surface water features such as rivers, streams, creeks, and wetlands. SST will cross these features by boring beneath the channel beds or by suspending the new fiber on existing bridges. When using directional boring, the drilling pits will be installed outside of the bank and floodplain areas. Although the Project route segments

will cross three Wild and Scenic Rivers (i.e., Snake River, Buffalo Fork River, and Blackrock Creek) by bridge suspension or boring, worksheets prepared by the NPS (December 6, 2010) and the USDA-FS (December 8, 2010) concur that implementation of the Project as described will have no effect on the outstanding, remarkable values of these waterways. The USDA-FS and NPS based these "no direct and adverse effect" determinations on the conditions that: (1) there will be no alteration of surface contours or drainage patterns; (2) installation of hand holes will be as flush to the ground as possible in the surrounding areas; (3) only one telecommunications hut will be constructed within a quarter-mile of the rivers; (4) vegetation will not be disturbed within 50 feet of the river banks; and (5) construction will have a very limited duration in the vicinity of the river systems.

Similarly, SST will traverse many wetlands along the Project routes by directional boring. However, in accordance with Nationwide Permit 12, plowing will be used where wetlands are dry during the construction period or where boring would be more invasive than plowing. No permanent loss of wetlands will occur. BMPs will be implemented when installing cable in areas that are vulnerable to flooding or erosion; these measures may include erosion control tools such as silt fencing, wattles, or blankets. A Project-specific Storm Water Management Plan will also be implemented to protect water resources from uncontrolled runoff and sediment loading. Although the fiber optic cable may intercept shallow groundwater tables at some locations along the route, groundwater deeper than 36 to 48 inches will be unaffected. In all cases, fiber lines will be either buried under floodplains or suspended over them on existing bridges. Based on these assessments, the Project will have only minimal impacts on water resources and are not expected to have any significant adverse impacts.

Biological Resources

Fiber optic line will be installed by plowing within existing ROWs, easements, and unpaved gravel and dirt back roads, trails, and pathways. These locations were specifically selected to minimize impacts on existing habitats. Boring under wetlands and waterways or suspending the cable on existing bridges will avoid creating impacts to these very productive, sensitive habitats. Also, the short duration of construction activities in specific locations (0.5-2 miles per day) will provide for a situation where movement of individual specimens due to minor noise or vibration impacts will be temporary, migration will not be impacted, and the general use of habitat will not be impaired. On November 5, 2010, the U.S. Fish and Wildlife Service (USFWS) determined that the Project is unlikely to adversely affect any threatened or endangered species or migratory birds. However, the USFWS stipulated that to protect migratory birds, SST must: (1) avoid construction and vegetation removal in areas with nesting habitat when nesting by migratory birds could occur (May 1 through July 31); or (2) survey the route within one week of construction to identify nests and ensure that impacts to migratory birds are avoided. If a nest is found during surveys or construction, it will be avoided temporally or, if possible, spatially. Ospreys have been observed using the nest located on a power pole about 200 feet from the north end of the bore site for crossing the Buffalo River. In order to minimize the potential for disturbing this nesting pair, boring at this site will be scheduled to begin no earlier than September 1. If it appears that the pair is actively nesting and are disturbed by the boring

activities, SST will consult with the biologist for Grand Teton National Park (GTNP) to determine what can be done to further minimize this impact. SST will also adhere to NPS and USDA-FS regulations and BMPs related to grizzly bears in the Project area. Adhering to these strict guidelines has proven effective in saving bears from having to be destroyed or trans-located.

No long-term deleterious impacts to surface vegetation would occur along either route segment. Established BMPs will be implemented with regard to site reclamation, cleaning of equipment to avoid spread of noxious weeds, and revegetation of sites where digging has occurred (e.g., hand holes, boring sites, or hut sites). To protect threatened and endangered plants, SST will conduct an early spring survey of a small meadow on the Togwotee Pass segment that may provide habitat for the blue *Elymus (Elymus multicaulis)*. In addition, although no threatened Ute ladies-tresses (*Spiranthes diluvialis)* were found during three surveys conducted in summer 2010, potential habitat for this species will be re-flagged and avoided during construction on the Teton Pass Segment.

Based on these assessments and implementation of specified BMPs, it is not anticipated that the Project will have any significant adverse impacts on biological resources.

Historic and Cultural Resources

On September 15, 2010, USU Archeological Services, Inc. (USU) (subcontractor to SST) sent a consultation initiation letter, including a detailed project description, to NTIA on behalf of SST. NTIA used the information in USU's letter to produce a consultation initiation letter to the Wyoming State Historic Preservation Office (SHPO), which was sent on September 17, 2010. USU then conducted applicable cultural resource investigations for the proposed project and produced a report in November 2010. The report, titled *The Cultural Resource Investigations for the Investment in Expanding Broadband Communication Opportunities in the Greater Yellowstone Area* (November 2010), identified over 70 buildings and sites in the Project area that are currently listed in the National Register of Historic Places (NRHP), but concluded that only one of these sites, the Blackrock Ranger Station, is located within the proposed 20-foot wide construction corridor. The Blackrock Ranger Station is proposed as a CAI, and as a site eligible for inclusion in the NRHP, will require mitigation to ensure minimal impacts from the Project. The fiber optic line will be buried following current utility/road alignments, and the fiber will be attached to the structure in an unobtrusive manner at the same location as existing telephone and power services. These connections can be removed at any time without permanent damage. Consequently, no long term impact to the Blackrock Ranger Station is anticipated as a result of providing fiber optic communication services under this Project. Fiber path routing and installation method decisions have also been made to protect other historic resources, including the Cunningham Cabin Historic Site, the Enterprise Ditch, the Uhl Ditch, and the Old Teton Pass Road. Fiber will be routed around the Cunningham Cabin and its parking lot. Cable will be bored under Enterprise Ditch to avoid surface impacts. Cable will be placed within Wolff Road where it parallels Uhl Ditch to avoid encroaching on this historic resource. Construction of the fiber line within the Old Teton Pass Road using the methods identified above is not expected to

adversely affect the integrity of this historic resource. Therefore, with implementation of these proposed routes and installation techniques, no adverse effects on these resources are anticipated.

The U.S. Department of Interior (DOI), National Park Service (NPS), Grand Teton National Park and the USDA-FS, Bridger-Teton National Forest were provided copies of USU's report and findings for review and subsequent concurrence. On December 6, 2010, the NPS sent a letter to the Wyoming SHPO indicating that two sites eligible for inclusion in the NRHP were recorded within Grand Teton National Park, and one additional cultural resource was identified, but determined not to be eligible for inclusion in the national register due to a lack of historical significance. The NPS determined that the proposed project will have no adverse effect to identified cultural resources, but recommended that if archaeological remains be uncovered during implementation of the Project, activity should cease and the appropriate state, federal, and tribal agencies be contacted. In a letter dated December 13, 2010, to the Wyoming SHPO, the USDA-FS concurred with the eligibility recommendations for four sites within the Bridger-Teton National Forest, and also concurred with the findings of the report that no historic properties will be adversely affected by the Project. The USDA-FS letter indicated no further cultural resource survey or evaluations are required prior to project implementation, but did indicate that if archaeological remains are uncovered during the implementation of the Project, that activity will cease and the appropriate federal, state, and tribal agencies will be contacted immediately.

In a February 23, 2011 letter, the Wyoming State Historic Preservation Office (SHPO) concurred that the Project will have No Adverse Effect on Historic Properties. This SHPO recommendation included consideration of potential historic and cultural resource effects within USDA-FS and NPS land. However, SST must ensure that an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards monitors all ground disturbance conducted in the vicinity of known archaeological sites, or suspected or known burials. If earth-disturbing activities uncover cultural materials (e.g., structural remains, historic artifacts, or prehistoric artifacts), all work in that area will cease, and SST will immediately notify interested Tribes, the SHPO, and NTIA. If earth-disturbing activities uncover human remains, all work in that area will cease immediately, the discovery will be secured, and SST will immediately notify law enforcement personnel (e.g., local police or County Coroner) and NTIA.

NTIA initiated tribal consultation on this Project through the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). Twelve tribes were contacted through TCNS in October 2010. In response to a follow-up information request from the Eastern Shoshone Tribe, SST sent additional information on the Project scope and location the Lower Brule Sioux Tribe, the Southern Ute Tribe, the Comanche Nation, the Fort Peck Tribes, the Eastern Shoshone Tribe, and the Shoshone-Bannock Tribes on January 25, 2010. As of March 14, 2011, no additional comments or responses regarding the additional information have been received.

Based on the results of the Section 106 consultations and associated recommendation, the Project is not expected to have adverse effect on historic or cultural resources.

Aesthetic and Visual Resources

The Proposed Action will result in short-term aesthetic and visual impacts during the construction and vegetation re-growth phases. The presence of construction equipment along the planned fiber route will be temporary and of short duration in any one area. Minimal root disturbance, combined with immediate restoration and compacting of disturbed soil, should result in rapid re-vegetation of the construction corridor within the year following installation. The four structures to be constructed under this Project will be located in developed areas, and these structures will not be a new source of visual or aesthetic impact.

Construction of the Togwotee Pass segment and completion of four specific waterway crossings will result in short-term aesthetic and visual impacts to the immediate foreground of involved sections of the three Wild and Scenic Rivers. However, as stated previously, both the USDA-FS and NPS have determined that this Project will not have a "direct and adverse effect" on these river systems. Furthermore, although both the Teton Pass and Togwotee Pass segments traverse USDA-FS land, but do not traverse any designated Wilderness areas. Accordingly, no significant aesthetic or visual effects will occur as a result of Project implementation.

Land Use and Recreation

The Project will not result in any long-term changes to existing land use. The four structures to be constructed as part of this Project are relatively small and will be erected in previously developed areas. Thus, their potential for long-term impacts on land use is minimal. However, there will be some short-term impacts on recreational use of the trails and pathways where fiber optic cable is being buried. Recreational users will encounter equipment, construction personnel, and materials at those locations. However, after the conduit has been buried and personnel and equipment have moved along the route, there will be no long-term effect. To minimize these impacts, SST will install the conduit in the least intrusive location and manner, move through a recreational site as rapidly as possible, and implement BMPs that ensure that the pathway or trail is restored as soon as practicable. Accordingly, this Project is not expected to have significant adverse impacts on land use or recreation.

Infrastructure

Implementation of the Project will result in a number of beneficial impacts by providing the infrastructure for a robust, reliable, and redundant state-wide network. The network, through interconnection with other providers and carriers, will result in benefits to nearly the entire State of Wyoming and much of the eastern half of the State of Idaho. This network is expected to secure continuous telecommunications; support anticipated population growth; and provide improved high-speed data access and internet service to government, emergency services, security, medical providers, educational facilities, and residential and business customers. The installation of the telecommunication huts and cabinets are essential facilities for the fiber optic network. These facilities are placed in strategic locations to allow for CAI connections and link

the network to the existing state-wide fiber optic networks. Overall, the Project will have no significant short-term adverse impacts, and beneficial long-term impacts, on infrastructure.

Socioeconomic Resources

Implementation of this Project will provide a robust and redundant communication path that would secure continuous telecommunications; support anticipated population growth; and provide improved data access and internet service to current and future government, emergency services, medical providers, law enforcement, educational facilities, and residential and business customers throughout the State of Wyoming, including currently unserved and underserved areas. Jobs in the construction, services, and other economies would be created in Jackson, Teton County, and neighboring communities. Positive impacts to socioeconomic resources that will result from Project implementation are considered moderate in the short-term and potentially major in the long-term.

Human Health and Safety

The Project network will offer higher bandwidth connectivity to rural healthcare facilities in the State of Wyoming and eastern Idaho. Through this enhanced connectivity, rural healthcare facilities and their patients will have access to more advanced and specialized services from larger medical institutions without having to travel outside local communities. These improved capabilities will have a positive impact on health in rural areas and attract additional health and safety facilities. Over time, law enforcement and search and rescue activities will also benefit, thereby enhancing safety in the Project area.

Construction activities will primarily occur on road shoulders, adjacent ditches, and utility corridors along highways and sometimes within gravel/dirt roads and trails. Consequently, SST and its contractors will not generally be located directly in the path of traffic except when delivering, unloading, or picking up equipment and supplies. At these times, appropriate traffic management would be used to warn and manage traffic in a safe manner to avoid accidents or injuries. SST and its contractors will comply with Federal Highway Administration requirements and the Manual on Uniform Traffic Control Devices to promote highway safety and efficiency by providing warning and guidance to all elements of traffic. However, there will periodically be some slowdowns or traffic backup as equipment and supplies are moved or delivered. SST and its contractors who are exposed either to traffic or construction equipment within the work area will wear high-visibility safety apparel. SST will also implement an accident prevention program that provides regular inspections of job sites, materials, and equipment.

To avoid creating any impacts associated with traffic impairment or impeded access near sensitive areas such as health facilities (particularly St. Johns Medical Center), fire stations, schools, or key intersections, SST will coordinate activities with law enforcement and municipal officials. If required by the affected municipality or facility, SST will develop a Health and Safety Plan with input from those potentially affected.

Based on these assessments, it is anticipated that the Project will have minor adverse impacts on human health and safety in the short-term, but beneficial impacts in the long-term.

Cumulative Impacts

The effects of implementing this Project will add cumulatively to other ongoing projects within the affected areas. These projects include completion of the road work on US 26 east from the Buffalo Fork River bridge to Togwotee Lodge; completion of segments of the multi-use pathway and related ancillary facilities that overlap with the planned route segments; planned routine road/street maintenance along both segments; and normal recreational/travel activities along the more remote portions of both segments. However, any potential Project contribution on cumulative impacts will be minor.

Decision

Based on the analysis presented above, 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:

Laura M. Pettus

Laura Pettus
Senior Communications Program Specialist
Office of Telecommunications and Information Applications

3/25/11
Date