

**National Telecommunications and Information Administration
Broadband Technology Opportunities Program
Finding of No Significant Impact
Lane Council of Governments, Lighting the Fiber Middle Mile Project**

Summary

Lane Council of Governments (LCOG) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to install approximately 124 miles of fiber optic cable, expanding an existing network of 344 miles, and connecting approximately 111 community anchor institutions (CAIs). Approximately 106 miles of cable will be attached to existing utility poles located along roadways. Existing utility poles along approximately 1.5 miles of the route will be replaced to accommodate the fiber optic cables prior to placement of aerial cable on the replacement poles. New utility poles will also be installed along approximately 8 miles of the route where existing poles do not exist or are unable to accommodate additional lines. Directional boring will be conducted along a total of approximately 7.2 miles, and trenching will be conducted over a total of approximately 0.9 miles. The proposed action will be implemented within Lane, Douglas, and Klamath Counties in Oregon, and is referred to as the Lighting the Fiber Middle Mile Project (Project).

The National Telecommunications and Information Administration (NTIA) awarded a grant for the Project to LCOG 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.

LCOG 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 approximately 124 miles of fiber optic cable in Lane, Douglas, and Klamath Counties in Oregon to expand an existing network of 344 miles to a total of 468 miles;

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- Attaching new cable to existing utility poles located along roadways for approximately 106 miles of the route;
- Replacing existing utility poles along approximately 1.5 miles of the route and installing cable on the new, replacement poles;
- Adding new utility poles along approximately 8 miles of the route where existing poles do not exist or cannot handle additional cabling;
- Installing underground fiber by directional boring within existing rights-of-way (ROWs) and utility corridors along approximately 7.2 miles of the route;
- Installing underground fiber by trenching within existing ROWs and utility corridors along approximately 0.9 miles of the route;
- Providing direct network connections to, and internal telecommunications equipment at, 111 CAIs in the three affected Oregon counties;
- Replacing one existing vault and adding 41 new utility vaults in sidewalks along the route; and
- Constructing two regeneration facilities in Oakridge and Chemult, an equipment hut in Chiloquin, and an interconnection point in Eugene.

Based on a review of the analysis in the EA, NTIA has determined that the Project, implemented in accordance with the preferred alternative, in compliance with the executed PA addressing historic and cultural resources, 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 design and install a communications system that is scalable, secure, reliable, and resilient. The Project will provide a fiber optic backbone that runs through the metropolitan areas of Eugene and Springfield and into the rural areas of Lane, Douglas, and Klamath Counties to provide the potential for broadband to be extended to businesses or households. The new network will also provide high-speed broadband services sufficient to meet the communication needs of educational institutions, medical facilities, and safety providers in the three-county area. CAIs, public safety entities, and critical community organizational users in the area currently lack the broadband services they need to operate efficiently. Area hospitals need a direct Ethernet service to allow them to establish a centralized record system, and medical clinics need better connections to enhance patient services. The emergency first responders need a secure, reliable broadband service system that allows them to communicate with each other. Libraries and community centers cannot currently provide the broadband connectivity they need to attract patrons or to provide necessary services for their users. Many schools in Eugene and Springfield, and in the outlying communities of Coburg, Oakridge, Myrtle Creek, and Riddle, need connectivity to participate in advanced educational programs. In meeting these needs, the Project will serve as a foundation for future economic recovery and growth in southwestern Oregon.

Project Description

This Project will install approximately 124 miles of new backbone fiber, to expand the existing backbone network from 344 fiber miles to approximately 468 fiber miles. Along approximately 106 miles of the planned route, new cable will be attached to existing utility poles along roadways. Aerial fiber will be hung on existing poles by pulling cable through metal hardware attachments on the pole. Bucket trucks will be used to gain access to telecommunications space on each pole. If conditions on the ground are such that a bucket truck cannot be used, the construction crew will climb the utility pole to install fixtures and assist with pulling cable through the attachments. Where necessary to accommodate new fiber infrastructure (along approximately 1.5 miles of the planned route), existing utility poles will be replaced and new cable will be installed on the new poles. Poles are installed using an auger or, in limited cases, a pneumatic drill (jackhammer) to drill through the ground to the desired depth. New pole holes will be advanced immediately adjacent to the existing pole being replaced. After the new pole is installed, cables on the existing pole are transferred to the new pole, and the old pole is cut off at ground level. Utility poles do not exist or are incapable of handling additional lines along approximately 8 miles of the planned route. New poles will be installed in these locations using installation methods similar to those outlined for replacement utility poles.

In urban areas where mandated by utility requirements, and in other locations where pole installation is not feasible, fiber optic cable will be installed underground in existing ROWs and utility corridors. Although this installation will be almost exclusively on the edge of paved roads, some fiber will also be installed under paved or unpaved parking lots. Directional boring

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is planned for approximately 7.2 miles along the route, and trenching is planned for approximately 0.9 miles along the route.

Signal regeneration facilities will be established at Oakridge and Chemult. At the Oakridge Industrial Park, a new building will be constructed to house metal racks and electronic regeneration equipment. This building will measure approximately 10 by 20 feet and will be situated on a 200 square foot foundation adjacent to four similar regeneration facility structures. The building will be surrounded by a chain link fence. The Chemult regeneration facility will be located inside the existing Oregon Department of Transportation (ODOT) maintenance station. Electronics equipment in this location will be supported by an external emergency power generator and fuel tank. In addition, an equipment hut will be erected at Chiloquin. The equipment hut will measure approximately 10 by 20 feet and be located approximately 10 feet to the rear of the existing Klamath Tribal Headquarters building. Both the Oakridge regeneration facility and the Klamath hut will be connected to external power from the local utility and equipped with an emergency power generator running on propane or diesel fuel. These generators will only run when standard power is lost. An interconnection point will also be installed in Eugene.

The Project will also replace one existing vault and add 41 new utility vaults to contain coils of fiber optic cable, typically at the ends of a directional bore or trenching segment. The vaults will be buried entirely under the surface or buried such that the top is at ground level and will be covered with a locked steel or reinforced concrete cover. The vaults will generally be small, with footprints ranging from 13 by 24 inches to 36 by 36 inches. Most vaults for this Project will be installed in the sidewalk at the base of a utility pole. For sidewalk installation, the contractor will cut away existing sidewalk, excavate a hole of sufficient depth (usually three feet), install the vault, and use concrete to fill in around the top sides of the vault. The vault will be placed such that the cover does not interfere with pedestrian traffic.

This Project also includes installation of optic equipment inside 111 CAIs and connection of that equipment to fiber cables extending from the new network and entering the buildings. Facilities to be served include school buildings, entire school districts, libraries, community service centers, housing and social service agencies, hospitals, fire districts, and ambulance services.

At certain proposed locations, design options for CAI connections are still being evaluated. In Veneta, the Project will use existing abandoned fiber optic line serving the Bonneville Power Administration substation, run a parallel line underground, or complete a new aerial installation for a 0.25-mile segment of the route. At the elementary school in Veneta, the Project will either trench across the school parking lot or be installed aurally parallel to the existing electrical and telephone lines. In Eugene, the Project will use existing overhead facilities or boring techniques to cross Division Avenue. At the Lane County Housing Authority site, several different locations are being considered for directional boring. At the PeaceHealth Barger Medical Building, the Project will either use a directional bore or aerial installation combined with underground installation. At Irving Elementary School, several installation and routing options

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are being considered. At the Klamath Tribal Health Clinic in Chiloquin, the new fiber connection will be installed underground, either by trench or directional bore. These minor variations do not affect the analysis of resource-specific impacts detailed in the EA and summarized in this FONSI.

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 Aerial and Buried Fiber Installation (Preferred Alternative). As noted in the Project Description, this effort will include installation of approximately 124 miles of fiber backbone infrastructure, connecting 111 CAIs in southwestern Oregon. In order of preference, the new fiber will be installed aerially on existing utility poles along existing roadways (106 miles), installed underground in existing ROWs and utility corridors using directional boring or trenching techniques (8.1 miles), and installed aerially on new or replacement utility poles (9.5 miles). As described above, specific installation decisions have yet to be made with regard to a small portion of the route, primarily involving lateral connections to a few of the proposed CAIs (totaling approximately 0.4 miles). This alternative also includes construction of two regeneration facilities, an equipment hut, and an interconnection point, as well as replacement of one vault and installation of 41 new vaults in sidewalks along the route.

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

Alternatives Considered But Not Carried Forward. LCOG considered a wireless alternative that would replace aerial fiber optic cable with radio towers and microwave radios. This alternative would require construction of several hundred radio towers at various altitudes above ground level, with huts and diesel generators installed at the base of each tower. However, microwave radio technology does not meet the Project's identified communication needs and does not scale as well as fiber for higher-speed connectivity. In addition, wireless technology is more susceptible to security breaches. Moreover, installation of a wireless network would not leverage existing long haul fiber optic facilities. LCOG also considered an all-buried alternative, but underground installation would take longer to install than overhead fiber cable installation, and is not suitable for all terrain and soil conditions along the planned Project route. Direct burial installation would be more susceptible to flooding impacts where the route parallels or crosses major river systems in Oregon. Finally, underground installation has a high initial cost compared to other systems and would require additional intrusive activity (digging) for maintenance or future expansion.

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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, Infrastructure, Socioeconomic Resources, and Human Health and Safety. Cumulative impacts were also evaluated.

Noise

Construction along the Project route will result in temporary short-term noise effects. In most areas, the fiber will be hung on existing poles, and increases in ambient noise will be minimal and similar to noises associated with regular maintenance of the existing utility lines. Noise associated with pole installation and replacement will be similar to that which occurs during utility line maintenance when replacement poles are required. Temporary and localized increases in ambient noise levels will result from the use of heavy machinery during trenching, boring, and vault installation. Impacts on noise sensitive facilities along the Project route (e.g., medical clinics, schools, libraries) will be minimized through careful construction scheduling, use of acoustic barriers, and implementation of other BMPs. Long term noise effects will be minimal because fiber optic cable does not generate noise during operation for data transmission. The regeneration facilities will emit noise similar to electrical equipment already present in those areas, but this noise will be generated within new and existing structures. Emergency power generators at the regeneration facilities and equipment hut will create temporary and short-term increase in noise levels during times of power outage. Based on this evaluation, the Project is not expected to have significant adverse impacts on noise.

Air Quality

Construction along the Project route will result in temporary and short-term impacts on air quality. Heavy equipment exhaust and possible dust emissions will affect the immediate Project area where trenching and new pole installation is required. Dust emissions will vary depending upon weather and soil conditions. Air quality impacts associated with fiber strand installation on existing poles will be minor and limited to air pollutant emissions from trucks and heavy equipment, and dust generated as heavy equipment moves from pole to pole along the road ROW. To minimize air quality impacts, LCOG will implement a variety of BMPs during the construction period, including dust abatement techniques for unpaved and unvegetated surfaces; rapid revegetation of disturbed areas; and proper operation/maintenance of construction equipment. Emergency power generation equipment will also result in minor but intermittent impacts on air quality in the long term. Given the temporary nature of fiber installation, and the limited extent of impacts during operation, this Project is not expected to have significant impacts on air quality.

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Geology and Soils

This Project will cause minimal disturbance of soil and geologic resources. Although new and replacement poles will be installed along portions of the planned route, these installations will occur only in existing ROWs where soils have already been disturbed. Using directional boring, in lieu of trenching, for the bulk of underground installation will minimize ground disturbance. The limited amount of trenching (i.e., less than 5,000 linear feet) will disturb soil in locations where existing utility poles do not exist and installation of new poles is not possible. Trenching will occur along existing roadways and a former railroad bed where soils have been previously disturbed. The regeneration facilities will be installed in existing buildings or on a foundation with a limited footprint (approximately 200 square feet) on developed property. To minimize impacts on soil and geology, LCOG will identify and avoid areas with unstable slopes or conditions that can cause slope instability; minimize vegetation removal; promptly revegetate disturbed areas; and implement erosion control measures during and after ground disturbing activities. An erosion and sediment control strategy will also be developed for the Project. No long-term impacts are expected for this resource area. Therefore, the Project is not expected to have any significant adverse impacts on geology and soils.

Water Resources

The Project route includes crossings of the South Umpqua River, the Umpqua River, Myrtle Creek, two tributaries to the South Umpqua River, and Lane Creek. Work over these water bodies is limited to attaching fiber strands to existing utility poles or existing bridges. The Project also includes installation of approximately 375 new poles along a five-mile stretch of the South Umpqua River (southeast of Dillard where Dole Road is contiguous to the river). However, this work will occur in existing ROWs and on the opposite side of the road from the river. BMPs will be followed to stabilize disturbed areas, control erosion, and prevent sediment drift into the river.

The Project route avoids shore land areas in Oregon except along a stretch of Highway 126 in Florence where aerial fiber will be hung on existing power poles and directional boring will be used to install a lateral under the sidewalk of Spruce Street. Construction BMPs will be followed to avoid and mitigate impacts to coastal resources. In an email dated October 8, 2010, the City of Florence indicated that this portion of the Project will have no coastal zone impact. In a letter dated February 9, 2011, the Oregon Coastal Management Program also found that the Project will not adversely affect coastal uses or resources.

No installation is planned to occur directly in wetlands, and there will be no discharge of dredged or fill material into wetlands. The Project will result in minimal disturbance of flood zones because, in most areas, the fiber strands will be affixed to existing utility poles. In areas where ground disturbance is planned, there will be no permanent alteration to the current landscape that could affect drainage patterns or the flood-carrying capacity of a watercourse. In addition, no releases of oils, hydraulic fluids, fuels, paints, solvents or other hazardous materials will be permitted to discharge into receiving waters. If water quality concerns do arise, LCOG will

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cease work and immediately contact appropriate agencies to coordinate spill containment and cleanup.

Based on these assessments, the Project will have only minimal impacts and will have no significant impacts on water resources.

Biological Resources

Project-related impacts to biological resources are expected to be minimal. No Project activities will occur within water resources, so federally listed fish species will not be impacted. Moreover, because the Project generally relies on existing infrastructure within existing ROWs and utility corridors, critical habitat of other species will not be impacted. In an e-mail dated February 2, 2011, the U.S. Fish and Wildlife generally concurred with LCOG's determination of "no effect" on threatened and endangered species, but deferred to the Oregon Department of Fish and Wildlife (ODFW) for further consultation on the Project. In an e-mail dated February 11, 2011, ODFW determined that, because the majority of the work will be limited to hanging fiber optic lines on existing poles, the Project will have no impact on fish and wildlife resources. However, ODFW encouraged the use of untreated poles to prevent introduction of chromate copper arsenate (CCA) or pentachlorophenol (PCP) into the local environment and the nearby South Umpqua River via road ditches or storm runoff. In an e-mail dated March 2, 2011, the National Marine Fisheries Service (NMFS) reiterated comments from ODFW, noting that eliminating contaminants by not using treated poles is the best approach for preventing adverse effects on the South Umpqua River and species that rely on that water resource. In response to ODFW and NMFS comments, LCOG will take steps to avoid leaching of CCA and PCP into the South Umpqua River. These steps include using treated poles that do not contain these compounds, locating the poles away from any possible runoff pathways, and using untreated poles where necessary. Based on these assessments and implementation of specified BMPs, it does not appear that the Project will have significant adverse impacts on biological resources.

Historic and Cultural Resources

On January 13, 2011, LCOG entered into a Programmatic Agreement (PA) with NTIA and the Oregon State Historic Preservation Office (SHPO) to ensure compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations. The Klamath Tribes and the Cow Creek Band of the Umpqua Tribe of Indians were the only tribes to respond to direct notification on the Project and, thus, are concurring parties to the PA. Under the terms of the PA, LCOG will conduct a cultural resource survey for the area of ground disturbance near planned construction to connect the Klamath Tribes Gaming Regulatory Agency. The survey will also include the area where ground disturbance is planned along Dole Road and Highway 227, in close proximity to known archaeological sites or in close proximity to areas where there is a high probability of discovery of previously undocumented sites. The resulting archeological resources report will be distributed to NTIA, affected tribes, and the SHPO for review and comment. In the event that the report identifies the possibility of cultural artifacts in the vicinity of any planned pole installations in the surveyed areas in southern Douglas County and Klamath County, LCOG will make test excavations under the direction of a qualified archaeologist, as

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outlined in the PA. These excavations will be sufficient to adequately test for the presence of artifacts in areas to be excavated after completion of testing. In the event that cultural resources are found along the length of planned directional boring in Klamath County, LCOG and the qualified archaeologist will develop an Archaeological Resources Monitoring and Treatment Plan (ARMTP) in consultation with the Tribes. Specific guidelines for the ARMTP are outlined in the PA. In the event of an inadvertent discovery of cultural resources, LCOG will immediately stop work in the area, implement measures to protect the discovery, and contact NTIA, the SHPO, and Tribes identified in the PA. If human remains are discovered, LCOG will immediately stop work in the area and notify appropriate law enforcement, NTIA, the SHPO, and affected tribal organizations. If implemented in compliance with stipulations outlined in the PA, this Project is not expected to have significant adverse impacts on historic and cultural resources.

NTIA also initiated tribal consultation on this Project through the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS). Eleven tribes were contacted through TCNS in December 2009. Two of the tribes, the Cow Creek Band of Umpqua Tribe of Indians and Klamath Tribe, responded to the notification and later became a concurring party to the PA. In response to requests received through TCNS, LCOG provided additional Project information to four tribes including the Fallon Paiute-Shoshone Tribe on May 3, 2010 and the Siletz Tribal Council, Confederate Tribe of Coos, Confederate Tribe of Warm Springs on July 13, 2010. No comments or responses have been received to date from any of these tribes. Five tribes including the Native Village of Gakona, Native Village of Kwinhagak, Burns Paiute Tribe, Yakama Nation, Confederate Tribes of Grand Ronde Community of Oregon expressed no interest in the Project but requested notification in the event that archaeological remains or resources are discovered during Project implementation.

Based on these consultations, through implementation of SHPO stipulations, and through implementation of the requirements outlined in the PA, the Project is not expected to have significant adverse impacts on historic and cultural resources.

Aesthetic and Visual Resources

Aerial installation is planned for the majority of the Project route, hanging new fiber on existing utility poles with existing wires. Placement of an additional cable on existing utility poles is consistent with the existing visual character along these utility corridors and will not have an adverse effect on local aesthetics, even on the five Scenic Byways where aerial installation will occur. For approximately 1.5 miles along the Myrtle Creek-Canyonville Tour Route Scenic Byway, the Project includes installation of new poles in the ROW. Although this section of the Scenic Byway already contains existing utility poles adjoining the Umpqua River, they cannot accommodate additional cable loading. The new poles will be installed on the opposite side of the ROW and will not interrupt views of the river. The addition of new utility poles will not be inconsistent with the character of the immediate landscape, and this minor long-term adverse impact on the local aesthetics is limited to a small area.

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The Project route also overlaps with the Cottage Grove Covered Bridge Tour Route over approximately 1,000 feet. Fiber installation in this area will involve trenching in the ROW and boring under existing driveways. This activity will result in short term impacts on aesthetics as construction crews trench roadsides, lay cable, bury it, and revegetate disturbed areas. However, these impacts will be temporary and eliminated following completion of Project construction and regrowth of vegetation.

The Project will also have temporary and short term impacts on aesthetics and visual resources as a result of construction staging and storage, erosion and sedimentation control, and dirt and dust generation during ground-disturbing activities. To minimize these temporary impacts, LCOG will remove erosion control structures as soon as the area is stabilized, keep the roadway and work areas as clean as possible, and stockpile materials in less visually sensitive areas. In addition, where trenching is planned, impacts to nearby trees can occur if the root structure of the tree is damaged. To minimize the possibility of such damage, measures to protect existing trees (e.g. installation of protective fencing at the drip line of trees) will be implemented, as appropriate, and depending on site conditions.

Considering the full extent of the Project, there will be no significant adverse impacts to aesthetic and visual resources.

Land Use

The Project is not expected to impact long-term land use. However, construction activities will cause temporary, short term impacts on different land uses along the route. These impacts will include temporary roadway closures or lane configuration changes, driveway or sidewalk closures or modifications, and utility shut-offs. To minimize these impacts, LCOG will prepare a plan to address construction scheduling and route modifications. To the extent practicable, access for pedestrians, bicyclists, passenger vehicles, and trucks will be maintained during construction. LCOG will coordinate with emergency service providers and community representatives to ensure the public safety during construction (to include detour routes and other traffic handling plans, if needed). Where landscaping, sidewalks, and driveway access will be affected, LCOG will coordinate with the landowner to replace these property features or compensate the property owner. Accordingly, this Project is not expected to have significant adverse impacts on land use.

Infrastructure

The Project will bring high-speed communications infrastructure to portions of the tri-county area that are presently underserved. Furthermore, construction work has been planned to minimize impacts on access and transportation, and directional boring will be used to complete driveway crossings in areas where ground disturbance is required. However, the addition of cable to existing utility poles, which can only accommodate a finite number of cables and associated equipment, represents a minor adverse impact on infrastructure in the Project area. Overall, the Project will have no significant short-term adverse impacts, and beneficial long-term impacts, on infrastructure.

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Socioeconomic Resources

The Project will have several positive effects on socioeconomics in the tri-county area. The Project will provide new and enhanced high-speed broadband access to residents, businesses, governmental agencies, medical providers, and educational organizations in southwestern Oregon. The Project will provide high speed communications that will support anticipated population and employment growth, job creation, and long-term economic opportunity. In addition, the Project is likely to stimulate local economies during the construction period, such as direct employment through immediate construction hiring. Accordingly, Project implementation will have short-term and long-term beneficial impacts on socioeconomic resources.

Human Health and Safety

The fiber optic line itself does not generate any known adverse health issues. Trained and qualified line workers will perform all work on utility poles. All installations will follow building and fire codes for safety, and all components will be appropriately rated for the application and properly installed. Because the Project primarily involves hanging aerial fiber optic cable along existing utility structures, the potential for contact with contaminated water and/or soil is limited. No Project work will occur in the vicinity of the two Superfund sites in the tri-county area. Only one Brownfield and site will be affected by planned directional boring or trenching activities. Elevated arsenic levels have been identified at the Sutherlin Industrial Park, and directional boring will occur in this area for approximately 1000 feet under the runway of the Sutherlin Municipal Airport runway. Ground-disturbing activities in this area have the potential to create minimal exposure risks which will be minimized by using dust abatement techniques, such as wetting and covering any excavated soils. Based on these assessments, it appears that the Project will have minor adverse impacts on human health and safety in the short-term. However, beneficial impacts should occur over the long-term through delivery of enhanced internet services to medical facilities and public safety organizations in the tri-county area.

Cumulative Impacts

The Project spans over three counties and coincides with existing roads and existing utility infrastructure. Routine maintenance and repair activities are occasionally required for the continued operation of these existing utility lines and roadways. LCOG will work with ODOT to coordinate scheduling of road maintenance, enhancement, and modernization projects to avoid conflicts. The Project will also have a minor cumulative impact on infrastructure related to placement of additional cable on existing utility poles. Because each pole can accommodate a finite number of cables and associated equipment, there may be less available space for potential future cables and lines. However, any potential Project contribution on cumulative impacts will be minor. Nevertheless, because no significant adverse impacts are anticipated to result from Project implementation, cumulative impacts with other unrelated activities will not be significant.

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Decision

Based on the analysis presented above, NTIA concludes that constructing and operating the Project as defined by the preferred alternative, the signed PA, 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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Date