National Telecommunications and Information Administration
Broadband Technology Opportunities Program
Finding of No Significant Impact
Ronan Telephone Company, Montana West Project

Summary

Ronan Telephone Company (RTC) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to install approximately 320 miles of new fiber optic cable. The fiber will be installed aerially and underground in existing road and utility rights of way (ROWs). RTC will also install optical amplifier (OP-AMP) station houses, to house the electric equipment that boosts the optical signal. In addition, RTC will install wireless base stations inside existing building equipment rooms and mount 5-10 foot antennas onto existing water/ telecommunication towers to connect customers to the network via wireless radio modem hardware. The network will directly connect 30 community anchor institutions (CAIs) and provide broadband access to the region's last mile and middle mile service providers. The Project will be implemented across five Montana Counties, and on the Flathead Reservation (home to the Confederated Salish and Kootenai Tribes [CSKT]) and the Blackfeet Indian Reservation, and is referred to as the Montana West Project (Project).

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

RTC completed an EA for this Project in June 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 360 miles of fiber optic cable within existing road ROWs or existing utility corridors;

- Installing fiber primarily underground via vibratory plows, directional boring (with placement in conduit), and trenching;
- Installing fiber aerially on existing poles in developed areas, at locations where terrain poses an obstacle to underground installation, and at some locations to avoid impacts to sensitive environmental resources;
- Installing OP-AMP station houses to house the electric equipment that boosts the optical signal;
- Installing access vaults and manholes/handholes to serve as splice points;
- Installing wireless base stations inside existing equipment rooms or structures on standard mounting racks within telecommunications equipment rooms, and mounting 5-10 foot antennas on existing water towers/telecommunication sites and tall buildings, to connect to the network via wireless radio modem hardware; and
- Providing connections from the new network to 30 CAIs.

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

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

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Purpose and Need

The purpose of the Project is to provide open-access, middle mile broadband infrastructure to rural, unserved, and underserved areas in western Montana. The Project will install fiber optic cable to connect 30 CAIs, including schools (grades K-12), higher education facilities, libraries, healthcare facilities, public safety entities, and other government facilities. These institutions currently lack access to broadband services or the existing broadband speeds are not sufficient to meet existing needs. In addition, the middle mile infrastructure will provide connectivity across

five Montana Counties and on the Flathead and Blackfeet Indian Reservations, to offer opportunities associated with broadband technology to 31,000 households and 3,200 businesses.

Project Description

The proposed broadband network includes approximately 360 miles of fiber optic cable across five Montana Counties and on the Flathead and Blackfeet Indian Reservations. RTC will install new fiber optic cable aerially and underground within existing roadway and utility ROW to complete the planned network. RTC will also install OP-AMP station houses, to house the electric equipment that boosts the optical signal. In addition, RTC will install wireless base stations to connect customers to the network via wireless radio modem hardware. The network will directly connect 30 CAIs and provide broadband access to the region's last mile and middle mile service providers.

RTC will comply with all National Electrical Safety Code (NESC) and National Electric Code (NEC) rules and regulations relevant to fiber installation and install buried fiber optic cable using one of three methods: vibratory plowing, trenching, and directional boring. Vibratory plowing will use a vibrating blade to loosen the soil and parent material in a swath 12 to 18 inches wide along the route alignment. As the plow moves along, cable is fed and laid a minimum of 24 inches (NESC requirements) to 42 inches (Montana State highway requirements) deep. There is no excavation of material, though the soil is displaced and stirred. A compaction machine will follow directly behind and return the soil to a desired level of compaction. The trench method uses either a 'wheel' or 'chain' trenching machine. Cable is placed at the bottom of the open trench, an average of 8 inches deep, and excavation is backfilled and compacted to restore the ground to its original condition and density. Trenching is not proposed in flowing streams with sensitive resources located at or downstream of the crossing. Direct buried cable, either via plowing or trenching, will be identified above ground, using orange marker poles, indicating that communication cable is buried below with contact information in case of damage to the cable. These marker poles will be placed every 500 feet and at various crossings.

Directional boring will be used in various locations along proposed fiber routes to cross areas where surface disturbance must be avoided, such as at railroad crossings, highways, streams, sensitive habitats, or wetland sites. To complete the bore, a work area is established on each side of the crossing. For river, stream, and wetland crossings, the work areas will be at least 25 feet from the band or edge of the wetland site. One side will be used as the 'pilot hole' and house the drilling equipment. The other side will be the 'receiving hole' where the directional drill bit will emerge. After the bore is complete, a steel conduit for the fiber optic cable will be pulled through the hole and the new fiber will be pulled through the conduit. Erosion control measures will be installed around the work areas at the boring locations. At flowing streams or sensitive resource locations, fiber optic cable crossings will be accomplished via directional bore under the resource, hung aerially attached to existing poles, or by attaching the conduit to an existing bridge. At bridge crossings, the cable will come out of the ground in a pipe at the bridge abutment and will be encased in a conduit attached to the bridge. It will then go back into the ground in conduit on the other side of the bridge, as it crosses the river or stream. The conduit

for the fiber line will be installed under the bridge deck, between the girders, to conceal and protect it as much as possible. All cable attachments will be in accordance with the bridge owner's requirements.

Aerial installation will occur on existing poles in locations where plowing or trenching is not practical, due to rough terrain or to avoid impacts to sensitive environmental resources along the route. Aerial cable will be strung pole-to-pole or building-to-pole along aerial sections of the route and strung using the self-supporting (ADSS) or lashed methods. RTC's preliminary design work has not yet identified specific locations where fiber will be installed aerially. However, it is anticipated that aerial installation on existing poles will be necessary at locations along the western shore of Flathead Lake where rocky terrain is common, within most developed areas, at some stream or river crossings, and at other isolated locations along the proposed fiber optic paths where it would be difficult to use other installation methods.

RTC will also install OP-AMP stations along the route, as required, based on the amount of fiber, distribution needs, and distance between fiber segments. Although specific sites have not yet been identified, preliminary investigation suggests the need for such stations in the Lakeside or Somers area and possibly at two sites on the Blackfeet Reservation. RTC will locate the facilities to minimize the need to construct access roads. OP-AMP stations will be established on a 50x100 foot area and include a prefabricated building secured to floating concrete slabs to minimize excavation and grading requirements. The buildings will come equipped with heating, ventilation, and air conditioning units, and will require electrical power supply and back-up emergency diesel generators. The stations will be located on private property outside of the ROWs and located in areas easily accessible via existing county road approaches and in close proximity to existing electrical transmission lines. RTC will need to acquire property or secure long-term easements to establish these facilities. Buried vaults, handholes, and manholes will be placed intermittently along the entire length of the route to provide access points and splice locations for the installation of fiber optic cables. Handholes are typically 36 inches in diameter and buried vaults measuring 6x9x6 feet will be used to house cable slack.

RTC will install last mile wireless internet facilities within several communities to deliver high-speed wireless service to residents and businesses by installing broadband wireless base stations connected to the fiber backbone. RTC will establish wireless base stations in the following communities: Arlee, Evaro, the Big Arm/Elmo area, the St. Mary/Babb area, East Glacier, Heart Butte, Browning, and Cut Bank. Although the specific location for each base station has not yet been identified, they will be located within existing equipment rooms on standard mounting racks near existing communications towers, water towers, or tall buildings in these communities to establish the effective broadcasts needed (i.e. "line of sight"). RTC will negotiate lease arrangements for each location. At each site, 5 – 10 foot central antennas will be mounted either on an existing water or telecommunication tower or multi-story building. Cabling and lightning protection will be installed for each antenna, and base station equipment will be installed at/or near the antenna locations. Base stations, which require 110V or 220V power supplies, will be connected to existing power supplies. Directional or omni-directional antennas will be installed

at the wireless base stations and consist of either flat panels (less than 1 x 3 feet in size) or round parabolic antennas (ranging from 2 to 6 feet in diameter).

RTC has not finalized the Project design for the 30 CAI connections. RTC may complete the connections by either aerial or underground fiber within the existing ROWs to the building, or by wireless connections using antennas installed at the CAIs to receive signals from the central base station antennas. In addition, some of the CAIs already have connections to existing hubs that would allow RTC to complete cross connections to link into the new fiber.

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.

Hybrid Underground Fiber, Aerial Fiber, and Wireless Network Installation (Preferred Alternative). This effort will install approximately 360 miles of aerial and buried fiber within five Montana Counties and on the Flathead and Blackfeet Indian Reservations, as described above. The project will also include installation of OP-AMP stations, vaults, handholes/ manholes, and wireless base stations. The network will directly connect 30 CAIs and provide broadband access to the region's last mile and middle mile service providers.

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 proposed broadband infrastructure would not be constructed, and most of the Project area would remain underserved. Sections of the network would remain susceptible to disruption of services if something malfunctioned (i.e., the ring design would not be completed). The EA examined this alternative as the baseline for evaluating impacts relative to other alternatives being considered.

Alternatives Considered But Not Carried Forward. Additional alternatives that would meet the purpose and need of this Project were also evaluated. Alternative routes were assessed, but the preferred route was selected based on the need for broadband services, cost, distance, availability of existing roadway ROW or utility easements, and ease of construction. An all-aerial network was considered but eliminated from further consideration. This alternative was eliminated due to the lack of existing aerial infrastructure, utility pole rental agreements, and susceptibility of damage during wind/winter storms. An all-wireless telecommunications network was also considered, but RTC determined this alternative was not a viable alternative to meet the existing data demands of many of the anchor institutions to be served by the Project.

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

The Project will generate temporary noise during construction and minimal noise during network operation. Construction of the network requires the use of trenching equipment, such as vibratory plows, directional drilling machinery, and bucket trucks. Equipment installed at the OP-AMP stations would result in minor increases of noise in the vicinity of the stations, including emergency back-up generator use. However, noise associated with construction equipment and the occasional backup generator use will be localized and limited to brief periods along any particular section of the Project route. Construction will occur during daylight hours. In the long-term, noise associated with maintenance of the network will be similar to existing noise conditions for utility maintenance. Based on these assessments, no significant noise impacts are expected to occur as a result of this Project.

Air Quality

This Project requires the use of construction equipment that generates emissions of ozone precursors and other air pollutants. Emissions generated during vehicle operation and soil disturbance during construction will locally increase particulates. Although the Project involves construction within the Blackfeet and Flathead Reservations, the level of emissions will not have adverse impacts that would degrade the air quality on the Reservations. Best Management Practices (BMPs) will be implemented to help minimize impacts, such as watering construction areas to minimize viable dust emissions, re-establishing ground cover on the construction site through seeding as required for erosion control, maintaining truck and equipment engines in good running condition, and cleaning equipment to reduce tracking soil onto adjacent roads.

The Project will constitute a short-term minor increase in the use of fossil fuel and associated greenhouse gas (GHG) emissions during construction. It is estimated that this Project will result in the release of approximately 2,650 metric tons equivalent of carbon dioxide 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.

Operations of the diesel generators at the OP-AMP stations will produce minor amounts of air quality emissions during a power outage. However, additional air pollutant emissions generated during the network's operational lifetime are not expected to be significant. Based on these assessments, no significant impacts to air quality are expected to result from this Project.

Geology and Soils

The Project will have minimal effects on the geology and soils because most of the work will occur in areas previously disturbed by road or utility construction. However, the construction of OP-AMP and wireless stations will disturb surface soils outside of the existing ROW. To minimize any potential impacts and control the transport of sediment to streams in the Project area, RTC will implement BMPs for erosion control and soil disturbance before, during, and after construction activities. These BMPs include limiting the area of earth disturbance, limiting

the time of exposure of disturbed areas, compacting soil in plowed areas after cable installation, and reseeding disturbed areas. The Project will not convert soils classified as prime, unique, or important farmland to nonagricultural use. Consequently the Project is not expected to result in significant impacts on geology or soils.

Water Resources

The Project will cross numerous perennial and intermittent streams, ephemeral drainages, and canals or ditches. Impacts to these resources will be minor. RTC will use directional boring, aerial installation, or run cable through existing attached-bridge conduit to avoid potential impacts on aquatic and sensitive habitats. Fiber installation will cross 100-year floodplains at several locations within the Project area, but is not expected to impede or redirect flood flows because the cable will be installed more than three feet below the ground surface.

On January, 14, 2011, the Army Corps of Engineers (USACE) – Missoula Office, responded to initial consultation for the Project. USACE stated that a Clean Water Act (CWA) Section 404 permit is required for discharge of fill material into waters of the U.S. However, based on the initial information RTC provided USACE, it was unclear if the project area includes wetlands or waters not delineated by the U.S. Geological Survey or National Wetland Inventory. USACE recommended the Project area be evaluated by a qualified wetland delineator. USACE noted that the project may qualify for the Nationwide Permit (NWP) 12 and indicated that other Federal, state, historical, tribal, and local permits may apply. According to a 2007 memo from the Environmental Protection Agency (EPA), a CWA Section 401 permit will be required for a water quality certification for activities occurring within Indian lands.

On May 2, 2011, RTC followed up with a phone call with the USACE, Missoula Office. RTC indicated that the wetland delineation work was being initiated that week and would follow up with USACE when the information became available. Additionally, a CSKT Aquatic Lands Conservation Ordinance 87A (ALCO) Permit was being completed by RTC and submitted to USACE, for work within the Flathead Reservation. RTC submitted a Joint Section 404 Application with the CSKT to the USACE as well.

On May 10, 2011, RTC followed up with a phone call with the USACE – Missoula Office. At that time, the Section 404 Permit (possible Nationwide Permit #12) and Section 401 Permit were considered incomplete due to the need for additional information and wetland mapping, which was required before the permit could be issued. The Section 404, NWP 12, and 401 Water Quality Certification permit application were submitted later in May 2011 and the wetland delineation reports were submitted to USACE on June 17, 2011. USACE has requested a copy of the Final EA and FONSI for their files and to support the permit determination.

The 87A ALCO permit was submitted at the end of April 2011 and correspondence stating no permit is required was received from the CSKT Shoreline Protection Office on May 17, 2011. The Flathead Indian Irrigation Project (FIIP) Cooperative Management Entity (CME) Special Use Permit was submitted on May 25, 2011. This permit is pending approval.

In addition, a National Pollution Discharge Elimination System (NPDES) Construction General Permit is also required for the project. The NPDES permit application, a Stormwater Pollution Prevention Plan (SWPPP) will be completed, and a Notice of Intent will be filed before construction may begin on the Flathead Indian Reservation.

The majority of the first year construction work will occur within the Flathead Reservation. However, other water quality permit requirements will apply when work occurs off Reservation lands, such as:

- Montana Pollution Discharge Elimination System (MPDES) Storm Water Construction General Permit from the Montana Department of Environmental Quality (MDEQ)
- MPDES Dewatering Permit from the MDEQ, if applicable
- Short-term Turbidity Standard (318 Permit) from the MDEQ
- Natural Streambed and Land Preservation Act (310 Permit) from Local Conservation Districts
- Aquatic Lands Protection Ordinance (ALPO 90-A) Permit from the Blackfeet Nation Environmental Office
- Publish Flood Plain Notice for work within the 100-year flood plain

RTC will use installation techniques that minimize or entirely avoid potential impacts to wetland sites and aquatic lands. If wetlands are wet, horizontal directional drilling will be used to place fiber beneath the wetlands. If wetlands are intermittently dry, a vibratory plow will be used to install the fiber optic cable. RTC may also elect to cross wetlands by attaching fiber to existing bridges or to span the areas by hanging cable on existing poles. Federal, state, and Tribal agencies will be consulted to determine which installation methods are appropriate for that location.

BMPs for erosion control outlined in a SWPPP would offer additional protection to surface waters and riparian habitats. Work in or near waters and wetlands would also be subject to conditions associated with various federal Clean Water Act permit requirements and aquatic lands protection permits from the CSKT and Blackfeet Tribes.

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

The majority of fiber optic cable will be installed aerially and underground within existing road and utility ROWs. RTC will use directional boring, aerial installation, and attach new fiber to existing structures to avoid and/or minimize impacts to streams, riparian areas, wetlands, and other potential wildlife habitat. Wildlife may be temporarily disturbed or displaced by noise associated with work activities and equipment operation, and from the presence of vehicles and construction crews in work areas. These impacts would be minor and localized to the work areas. Impacts on vegetation would be limited to temporary ground cover and shrub understory

species that are disturbed by vehicular and foot traffic, and the operation of equipment during the fiber installation. These impacts will be minor and short-term, occurring in existing ROWs. Areas where vegetation is removed will be reseeded. There are known locations where plants important to Native American tribes could be directly impacted by cable installation and vehicle and foot traffic along the routes. Because marking these locations may bring unwanted attention to them, Tribal monitors will be asked to identify the sensitive area(s) in advance of construction near the sites so avoidance measures can be taken.

NTIA contacted the U.S. Fish and Wildlife Service (USFWS) via a letter dated December 13, 2010, to initiate Section 7 consultation. RTC's environmental consultant met with USFWS Montana Field Office on January 4, 2011 to review listed species that may occur in the Project areas, discuss potential effects to the species resulting from proposed activities, and establish conservation measures that RTC can incorporate to prevent adverse effects to listed species. The USFWS responded to the NTIA's December 13, 2010 request via a letter dated January 13, 2011. In the response letter, the USFWS offered recommendations for conservation actions to prevent adverse effects on listed species. The recommended conservation actions are listed below:

1. Keep the cable installation primarily within road or other utility right-of- ways;
2. Use directional bore methods should to avoid wetlands, ephemeral streams, and other obstacles, such as culverts and drainage structures;
3. Cross streams either by attaching the cable to existing highway or county bridges or by directional boring methods to avoid in-water work; and,
4. Reclaim disturbed areas promptly and minimize pesticide use.

The USFWS concluded that if the conservation actions noted above are incorporated into the project plan, there should be no significant adverse impacts on fish and wildlife resources under the agency's purview. In a letter dated February 7, 2011, the USFWS concurred with the no effect determination for the listed species in the Project areas.

RTC also solicited comments about potential effects on listed species on the Flathead Reservation from the CSKT Wildlife and Fisheries Department. On May 24, 2011, RTC received comments from CSKT that indicated that the Project would be unlikely to have significant adverse effects on grizzly bears or their habitats and that no adverse effects to Canada Lynx or their habitat are anticipated. If construction crews observe grizzly bears, it was recommended that crews immediately report any such observations to the Wildlife Department. Additionally, it was recommended that construction crews adhere to appropriate sanitation guidelines related to the storage of food items, garbage, and other potential bear attractants. In a letter dated June 2, 2011, the CSKT Fisheries Department indicated there were no impacts to fisheries resources on the Flathead Reservation, as long as RTC adheres to plans for directional boring beneath surface waters.

No specific comments on potential effects to wildlife and fishery resources were provided by the Blackfeet Environmental Office.

The Project will not adversely impact Federal- or State-listed threatened or endangered species, and therefore, will have no significant impacts such resources. Furthermore, based on the assessments presented in the EA and above, the project will have no significant impacts on biological resources.

Historic and Cultural Resources

In a letter dated December 15, 2010, NTIA initiated consultation regarding the Project with the Montana State Historic Preservation Officer (SHPO) under the National Historic Preservation Act (NHPA). The Montana SHPO responded to NTIA in a letter dated December 20, 2010, and agreed to perform a file search for the Project upon receipt of a File Search Request Form. The Montana SHPO also suggested contacting the appropriate Tribal Historic Preservation Officers (THPOs) for the Flathead and Blackfeet Reservations, and provided the THPO's contact information. The Montana SHPO followed up with NTIA in a letter dated December 27, 2010, to provide a list of the necessary information required for a file search, which included quad maps showing the planned placement of the infrastructure, a list of the Townships potentially affected (including range and section), and descriptions of past ground disturbance and present condition/use. In letters dated January 2, 2011, NTIA initiated Section 106 consultation with the Blackfeet Nation and the Confederated Salish and Kootenai Tribes (CSKT) of the Flathead Reservation, and requested the THPO to allow RTC to contact the Tribes directly to provide further project information.

RTC then prepared a *Class I Cultural Resources Study for the Proposed Montana West Project* that identified 23 archaeological sites within the Area of Potential Effects (APE). RTC determined that the Project would not affect eight of the sites, and proposed that Adverse Effects on six sites could be avoided by using directional drilling or re-routing of the cable in that area (i.e. opposite side of the road). (The Bureau of Indian Affairs (BIA) subsequently recommended that an archeologist monitor the Project as lines are installed in the vicinity of the remaining sites to ensure avoidance of impacts.)

On April 5, 2011, RTC (through their consultant, Robert Peccia & Associates) transmitted the cultural resources study to the Montana SHPO. Also on April 5, 2011, NTIA transmitted the study to the CSKT and Blackfeet Tribe THPOs, and requested concurrence that the project would have No Adverse Effect on Historic Properties if implemented following recommendations in the report. A copy of the Cultural Resources Study was also sent to the Regional Archaeologist for the BIA on April 12, 2011.

On May 11, 2011, the Montana SHPO concurred with the summary and conclusions in the study, the recommendations for additional work including archaeological monitoring, and a finding of No Properties Effected (sic). The SHPO's concurrence letter addresses proposed work on lands outside the boundaries of the Flathead and Blackfeet Reservations. The SHPO further commented that while the level of disturbance in the corridor was extensive, their guidelines recommend Class III inventory for ground disturbing projects, and any future proposals deviating from the guidelines would require more in depth SHPO consideration.

The BIA's Regional Archaeologist submitted a letter to NTIA on May 13, 2011 with comments on the cultural resources study. The letter included recommendations to help avoid impacts on cultural resources on the Blackfeet Reservation. The BIA's recommendations included:

- Using Blackfeet THPO cultural resource field technicians to relocate and update boundaries, mapping, site forms, and photographs for cultural sites directly located on proposed Montana West fiber routes.
- Using Blackfeet THPO cultural resource field technicians to monitor ground disturbing activities for inadvertent discoveries near identified sites.
- Using the Blackfeet THPO cultural resource field technicians conduct a Traditional Cultural Properties (TCP) survey to identify cultural properties significant to the Blackfeet Tribe within the right-of-way.
- Providing the Blackfeet THPO and BIA with a map of where buildings, cable access locations, and markers associated with the Montana West fiber optic cable routes will be located.
- Following the recommended protocols for inadvertent discovery of cultural materials or human remains during construction.

The BIA's letter concluded the Project will have no effect on any cultural or historic properties as long as the recommendations offered are followed.

On May 31, 2011, NTIA received a form letter from the CSKT Tribal Historic Preservation Office which approved the installation of fiber optic lines in roadway and utility rights-of-way within the Flathead Reservation. The Preservation Office provided a one year cultural clearance for the project, requiring the project be initiated within one year of the date of the form, and requested that consultation be maintained as the project is implemented. The letter also included a special condition regarding the incidental discovery of historical or cultural artifacts.

On June 8, 2011, the Blackfeet Tribe concurred with the BIA's Regional Archaeologist that the Project would have no effect on historic properties. The THPO's letter concurred with the BIA's recommendations for implementing procedures to help avoid impacts to cultural resources and to conduct additional cultural resource evaluations on the Blackfeet Reservation.

On June 10, 2011, NTIA sent a letter to the CSKT THPO requesting confirmation of the concurrence that the project should have no adverse effect on historic properties, provided specific conditions are met. NTIA provided this letter to CSKT to clarify the information provided in the form letter on May 31, 2011. On June 28, 2011, CSKT provided to NTIA the counter-signed form indicating that they concur with the findings of no adverse effect on historic properties.

RTC also provided information about the Project to other Native American tribes. On December 24, 2010, NTIA notified 15 Native American tribes of the Project through the Tower Construction Notification System (TCNS). RTC consulted with two of the Native American

tribes, the Blackfeet Nation and the CSKT of the Flathead Reservation, as described above. Of the remaining 13 tribal organizations, nine did not respond, and four responded to the TCNS notification with requests for additional information. This information was provided to the four tribes on March 31, 2011, via memos which presented additional details on the Project's geographic area and proposed scope, and which requested confirmation of each tribe's interests in the project. Of the four tribes that requested and received additional information, one responded to RTC indicating that they did not require any further information about the Project, and the other three tribes have not responded to date.

RTC has identified 30 anchor institutions it may initially serve and the potential to serve another 45 CAIs in the future. Many (probably most) of the CAIs are already served by existing broadband providers, and the number of new physical connections from Montana West lines to CAIs will be limited. Connections to CAIs may also be made through existing hubs which would not require physical modifications to buildings. NTIA has developed Best Management Practices (BMP) for making broadband connections to potentially historic buildings. Where physical attachment is required, RTC will implement these BMP in making connections to all CAIs forty five years or older in order to ensure that the project will have no adverse effect on historic properties.

If Project construction activities uncover cultural materials (e.g., structural remains, historic artifacts, or prehistoric artifacts), RTC will stop all construction work within 150 feet and will immediately notify interested Tribes, Nations, the SHPO, and NTIA. If earth-disturbing activities uncover human remains, all work will cease immediately, in accordance with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) and relevant State statutes. The area around the discovery will be secured and appropriate law enforcement personnel 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 primarily involves installing aerial and buried fiber optic cable in previously disturbed rights-of-ways, construction of several small prefabricated OP-AMP stations, installation of wireless base stations within existing telecommunication equipment rooms, and installation of 5-10 foot antenna co-located on water/telecommunication towers or tall buildings. Fiber installation will have a short-term, minor, and temporary impact on aesthetic and visual resources due to the presence of construction equipment and limited soil disturbance. Aesthetic and visual quality of the area will not be impacted in the long-term because the fiber will be installed aerially on existing infrastructure, or underground, and the tops of vaults and manholes/handholes will be located at-grade. The placement of markers noting the locations of buried cable will be consistent with road signs and other utility markers that may already exist within the road ROWs. The installation of OP-AMP stations will introduce several small prefabricated buildings with infrastructure (electrical power supplies, site fencing, and access provisions) along the route. These stations will be sited to minimize intrusions on natural

landscapes and the buildings will be installed in areas along highway corridors and in developed areas where any above ground structure could be located easily and blend in with the existing environment. RTC will also install wireless base stations throughout the Project area. Antennas for these stations will be mounted on existing towers or tall buildings to minimize the visual impacts of these new facilities. Because cable will be installed underground, placed on existing utility poles with existing wires, and antennas mounted on existing towers or buildings, the new infrastructure is expected to blend into the visual landscape and will not adversely impact area aesthetics. Based on these assessments, this Project will have no significant impacts on aesthetic or visual resources.

Land Use

Land use along the proposed route includes mostly residential, commercial, agricultural, and community facilities and uses. The infrastructure necessary to complete this Project will be deployed and installed within existing roadway ROWs and existing utility easements. These improvements are consistent with normal uses of ROWs and easements. RTC is pursuing Utility Occupancy/Encroachment Permits from the Montana Department of Transportation (MDT) for the installation of fiber optic facilities associated with the construction activities within the ROW for State-maintained highways. RTC is also working with the affected counties and the CSKT and Blackfeet Tribes to secure approvals for installation of fiber optic lines, as appropriate. All OP-AMP stations will be located on private property outside of the ROWs. RTC will need to acquire property or secure long-term easements to establish these facilities. Based on these provisions, the Project will have no significant impact on land use.

Infrastructure

Fiber optic cable will be installed aerially on existing utility poles or underground via trenching, directional boring, or vibratory plow. RTC will coordinate with the owners of the other utilities and the agencies responsible for the road systems to locate and mark existing infrastructure. The Project is not expected to damage existing utilities and electric power service is not expected to be disrupted during construction of the Project. The power supply needed for the OP-AMP stations would create additional, permanent, but small, demands on electrical power supplies in the project area. There are no plans to create new roadways, temporary or otherwise, during the Project. Project construction activities will result in a temporary interruption of traffic flow along the Project route. These interruptions are short-term and will subside when installation of the fiber is complete. The Project will improve communications infrastructure and is expected to result in improved transfer of information between CAIs, businesses, and individuals within the communities along the Project route. Based on these assessments, the Project is not expected to have significant negative impacts on infrastructure and is expected to have a positive overall impact on infrastructure in Montana.

Socioeconomic Resources

This Project will allow rural residents, businesses, and institutions in Montana to access high-speed internet, communications, and other broadband applications. The Project will have positive direct and indirect economic benefits. RTC estimates that the Project will create employment, including direct opportunities in the engineering, construction, and fiber optic

supply industries. Indirect economic benefits include new jobs for last-mile providers; new jobs for rural industries that need broadband infrastructure to remain competitive; enhanced opportunities for telecommuting and online collaboration; and educational opportunities via online education and connected classrooms. Overall, the Project will have a positive impact on socioeconomic resources in the region, and is not expected to result in significant impacts on socioeconomic resources.

Human Health and Safety

It is not anticipated that hazardous materials will be encountered during construction of either aerial or buried fiber. Federal, state, Tribal, and local regulations that establish procedures for proper reporting, handling, and disposal of such materials will be followed if contaminated material is discovered. If contaminated soils are identified, work will be suspended in the areas of concern until an investigation can be conducted to determine the presence and extent of soil contamination and determine appropriate future actions. The project will not require the long-term storage, treatment, disposal, or transport of hazardous materials. However, small volumes of petroleum hydrocarbon and their derivatives (e.g. gasoline, diesel fuels, oils, lubricants, and solvents) will be used to operate the construction and installation equipment. RTC will follow a SWPPP, which includes water quality protection, in the case of an accidental spill.

RTC will develop and implement traffic control plans to establish and maintain safe work zones and will comply with the Federal Highway Administration (FWHA) requirements and the Manual on Uniform Traffic Control Devices to promote highways safety and efficiency by providing warning and guidance to traffic in work zones. To minimize any adverse impacts on the public during construction, warning signs, barricades, and flaggers will be used to restrict access to work areas. Construction-related personnel working within the public ROW who are exposed either to traffic (vehicles using the highway for purposes of travel) or to construction equipment within the work area will wear high visibility safety apparel. To minimize any adverse impacts to workers during construction, other personal protective equipment, such as hard hats, steel-toed footwear, and hearing protection devices will be required. RTC will comply with all applicable federal, state, local, and industry-specific health and safety regulations, including Occupational Safety Health Administration's health and safety standards for construction sites. RTC will comply with all National Electrical Safety Code (NESC) and National Electric Code (NEC) rules and regulations pertaining to fiber installation.

By adopting the safety and coordination efforts described above, it is anticipated that the Project can be constructed with no significant impacts on human health and safety.

Cumulative Impacts

As described above, the Project will not have significant adverse impacts on any of the environmental resource areas evaluated in the EA. The impacts identified in the EA were analyzed in conjunction with other past, present, and reasonably foreseeable future actions in the project areas, and the analysis did not identify any negative cumulative impacts to environmental resources. The analysis did identify the potential for beneficial cumulative effects to occur for

businesses, institutions, and residents of the project areas due to new and improved high-speed telecommunications services.

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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