**National Telecommunications and Information Administration**
**Broadband Technology Opportunities Program**
**Finding of No Significant Impact**
**Bloomingdale Communications Inc., Van Buren County Fiber Ring Project**

## Summary

Bloomingdale Communications Inc. (BCI) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to provide high-quality broadband service to underserved community anchor institutions (CAIs), public safety entities, and economically distressed areas in Van Buren County and parts of Berrien and Allegan Counties, Michigan. To create the network, BCI will install approximately 137.5 miles of middle mile fiber optic cable. Approximately 110 miles of cable will be installed underground in existing, previously disturbed roadway and utility rights of way (ROWs) using plow or directional drill methods. The remaining 27.5 miles of fiber will be installed aerially on existing utility poles. Pole replacements will be made by the independent power company, where necessary, to accommodate the new cabling, but no new poles are planned. In addition, two communications equipment shelters will be installed to house fiber optic transport equipment, associated power equipment, and fiber optic cable termination equipment. One hut will be located in Lawrence, on or near the property of the Van Buren County Intermediate School District. The other hut will be located in South Haven, along Blue Star Highway between Highways M-43 and M-140. Electronics cabinets will also be installed in Bangor, Covert, Decatur, Gobles, Hartford, and Lawton. Finally, fiber laterals will be installed, where necessary, to directly connect identified CAIs to the backbone network. This Project is referred to as the Van Buren County Fiber Ring Project (Project).

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

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

The Project includes:

- Installing approximately 110 miles of buried cable in existing roadway and utility ROWs using plowing and directional drilling methods;
- Using metal hardware to attach approximately 27.5 miles of cable to existing utility poles along the planned network route;
- Coordinating with regional power companies to replace existing utility poles with insufficient strength or space to accommodate the new cabling;
- Installing two communications equipment shelters in Lawrence and South Haven;
- Installing electronics cabinets in Bangor, Covert, Decatur, Gobles, Hartford, and Lawton;
- Placing fiber optic transport equipment, power equipment, backup generators, and fiber optic cable termination equipment in the newly installed shelters and cabinets; and
- Installing fiber laterals to 42 CAIs and two public safety entities associated with the Project.

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

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

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## Purpose and Need

The purpose of this Project is to connect to and complete regional fiber optic infrastructure that will provide broadband service to meet the needs of CAIs, public safety entities, and residents in economically distressed areas of Van Buren, Berrien, and Allegan Counties. Once completed,

this Project will allow for greater opportunities in healthcare, education, and public safety, as well as commercial and social endeavors. The goal is to expand access to broadband services in this rural area that will allow for a variety of interactive two-way broadband services and digital multimedia. The new infrastructure will enhance opportunities for research and distance learning; stimulate demand for broadband service; and foster economic growth and job creation.

**Project Description**

This Project involves construction of a new middle mile fiber ring network along approximately 137.5 miles of roadway and utility ROWs in Van Buren County and parts of Berrien and Allegan Counties, Michigan. Approximately 80 percent of the network will require burying cable within existing public roadway and utility ROWs that have already been disturbed. The fiber optic cable will be placed at a minimum depth of 36 inches primarily using plowing or directional drilling methods. Plowing will be the primary method used to install buried fiber optic cable. A typical plowing blade, which is not more than 2-3" wide, acts like a knife during plowing and consequently results in minimal, temporary disruption of the landscape. All river/stream crossings will be completed using the directional drilling method. Directional boring pits and the staging of equipment or materials will occur in upland areas set back a minimum of 25 feet from existing stream banks and associated wetlands. After installation, BCI will restore bore pits and staging areas to their original grade using original soil materials and will then seed the areas. Fiber will be placed at least 5 feet below the river/stream bed. Horizontal directional drilling will also be used for conduit placement under surface obstacles, such as sidewalks and roadways. No substantial amounts of soil will be moved during fiber installation.

The remaining 20 percent of the network will be completed via aerial installation. Metal hardware attachments will be used to hang cable on existing wood utility poles along the service route. No new poles are planned, but pole replacements will be made by the power company, where necessary, to accommodate the new cabling. The pole replacement process requires no ground disturbance other than digging a hole adjacent to the existing pole being replaced. Poles will be installed to depths of approximately five to eight feet below ground surface. After the replacement pole has been installed, the power company will transfer all existing attachments to the new pole, and BCI will place the new fiber cable. The cable will generally be placed parallel with and in proximity of existing cables.

Fiber laterals will also be installed to directly connect 42 CAIs and two public safety entities in 12 cities to the new network. The laterals will be installed both aerially and underground. The Project also involves placement of additional equipment within BCI's existing central office buildings. In addition, BCI will install two prefabricated huts to house the fiber optic transport equipment, associated power equipment, and fiber optic cable termination equipment. These communications equipment shelters measure approximately 12 feet by 16 feet, and will be situated on a poured concrete foundation with an additional 5 foot by 5 foot poured concrete stoop. The huts will be located on or near the Van Buren County Intermediate School District property in Lawrence, and along Blue Star Highway in South Haven. These huts will be

connected to existing power utilities and will be equipped with air conditioning equipment and standby generators for emergency power backup. In addition, BCI will install six electronics cabinets and necessary power equipment in Bangor, Covert, Decatur, Gobles, Hartford, and Lawton. The huts and cabinets will house electronics for the network, and provide fiber termination points for the fiber optic cable for the network backbone and fiber laterals to the CAIs.

The planned fiber ring installed under this Project will connect with a separate middle mile fiber optic system being installed in the same general area by Merit Technologies with ARRA funding. The new network will also complement another independent, ARRA-funded project involving installation of public computer centers by Michigan State University.

**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.

*Proposed Project (Preferred Alternative) – Hybrid Underground and Aerial Fiber Network Installation.* As noted in the Project Description, this effort will include installing approximately 137.5 miles of fiber optic cable in existing roadway and utility ROWs in Van Buren County and parts of Berrien and Allegan Counties. BCI will install 80 percent of the network as underground infrastructure using plowing and directional drilling techniques, and the remaining 20 percent of the network aerially through attachment to existing utility poles. BCI will coordinate with the local power companies for pole replacements as needed. In addition, BCI will install aerial and buried fiber laterals to 42 CAIs and two public safety entities and erect two telecommunications equipment shelters and six equipment cabinets along sections of the planned fiber route.

*Alternative 1 – Underground Fiber Installation.* This alternative would involve installation of the entire fiber network as underground infrastructure. This alternative would also require cutting into paved areas and disrupting more densely populated areas (such as the City of South Haven). BCI determined that complete underground installation would not be as efficient as using a combination of underground and aerial installation.

*Alternative 2 – Aerial Fiber Installation.* This alternative would involve installation of the entire fiber network as aerial infrastructure. This alternative would also require installing additional poles where none exist to cover the entire route. Existing utility poles may already have reached their capacity and may not be available for use to support this new fiber network. This alternative would result in increased visual impacts and would not leverage previously disturbed areas that could accommodate new buried infrastructure. Moreover, aerial infrastructure is susceptible to severe weather, including icing, which can break the cable or poles and cause network outages.

*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 Van Buren County Fiber Ring would not be constructed, and telecommunications needs in this underserved rural area will continue to be unmet. The EA examined this alternative as the baseline for evaluating impacts relative to other alternatives being considered.

*Alternatives Considered But Not Carried Forward.* Wireless technologies were also considered for implementation of this Project. This option would require construction of multiple towers, with shelters, radio gear, and diesel generators installed at the base of each tower. Construction of access roads may also be required. Wireless technology is more visible and appears to be more susceptible to security breaches than buried or strung cable. The construction of several large towers of varying height would cause significant ground disturbance in previously undisturbed areas, and result in significantly more visual impact than the Proposed Action. Additionally, for inter-community traffic where high speed is needed, wireless technology does not scale as well as fiber and can be more expensive to operate and maintain. Accordingly, this option was not carried forward for detailed evaluation in the Environmental Assessment.

**Findings and Conclusions**

The EA analyzed existing conditions and environmental consequences of the preferred alternative and the no action alternative in 11 major resource areas, including Noise, Air Quality, Geology and Soils, Water Resources, Biological Resources, Historic and Cultural Resources, Aesthetic and Visual Resources, Land Use and Recreation, Infrastructure, Socioeconomic Resources, and Human Health and Safety. Cumulative impacts were also evaluated.

***Noise***

The Project will result in minor, temporary increases in ambient noise levels during the construction phase. Noise increases will be associated with drilling, trenching, pole replacement, CAI connections, and construction of six equipment cabinets and two equipment huts. These short-term noise increases will be associated directly with construction activities, increased traffic in the vicinity of the construction activities, and use of heavy vehicles and equipment. These increases in noise will end with the completion of the construction process. Periodic backup power generation at the telecommunications huts will have sporadic, but minor, impacts on noise throughout the network's long-term operational period. Based on these assessments, no significant noise impacts are expected to occur as a result of this Project.

***Air Quality***

The Project will not adversely affect air quality in the long term at or near the Project route. However, temporary impacts to air quality may result from airborne dust and diesel fuel emissions associated with short-term use of construction equipment. To reduce temporary impacts to air quality, BCI will water down construction areas, when necessary, and keep fuel-burning equipment operations to a minimum. The generators to be placed within the two

telecommunications huts will be used during times of power outages and monthly testing. Small amounts of particulates may be released into the air during these operations, but no significant air quality impacts are expected. Propane-fired emergency generators do not generate pollutants that significantly contribute to the degradation of air quality. It is estimated that this Project will result in the release of approximately 3.878 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. Based on these assessments, no significant impacts to air quality are expected to result from this Project.

***Geology and Soils***

No significant impacts on geology or soils are anticipated to occur as a result of Project implementation. Land-disturbing activities will be conducted on previously disturbed soils, and no substantial earth moving will occur. Aerial fiber installation, plowing, and directional drilling minimize disruption of the landscape. To minimize soil disturbance during pole replacement, new poles will be located in the same location or immediate vicinity of the poles they are replacing. All borings will be backfilled with native soils from the spoils of the excavation. Installation of the two telecommunications huts will require grading of approximately 480 square feet of land, but the huts and foundations will be located on previously disturbed or developed lands. All hut and cabinet locations appear to be accessible via existing roadway infrastructure. Best management practices (BMPs) for erosion control will be implemented, including containment of loose soil during installation activities; backfilling excavated areas immediately after installation of the fiber optic cables; and revegetating areas of ground disturbance as soon as is practicable after fiber installation. Additionally, silt fences and swales will be constructed prior to any land disturbing activities and maintained during all construction activities. No prime farm land will be converted to use for any other purpose. Based on these assessments, and through implementation of appropriate BMPs, the Project is not expected to result in significant adverse impacts on this resource area.

***Water Resources***

The Project route requires approximately 43 crossings over water bodies including major rivers and numerous creeks, streams, ravines, and surface drains. Due to meandering of the rivers and streams, multiple crossings of the same waterway may occur. One aerial crossing will be completed on existing utility poles over the Black River in South Haven; the remaining 42 crossings will be completed by boring and underground placement of fiber. Horizontal directional drilling will be used for underground waterway crossings, with fiber optic cables being installed at least 60 inches under stream beds. All construction activities will be performed in a manner that will prevent entrance or accidental spillage of contaminants, debris, wastes, and other pollutants into surface waterways and underground water sources. Erosion and sedimentation control BMPs (e.g., silt fences, limited riparian vegetation removal, and timely revegetation) will be implemented on steep slopes and adjacent to water bodies. Staging areas for construction personnel, equipment, and materials will be no closer than 300 feet of a surface water feature. Because the Project route is located within existing roadway and utility ROWs, impacts to wetlands and coastal management zones are expected to be minimal. The potential

for impacts will be further reduced by using directional boring to install underground cable in areas where wetlands may be present. The huts and cabinets will not be erected in floodplains, wetlands, coastal management zones, or other environmentally sensitive areas. Based on planned depths of underground cable installation, footings, and foundations, groundwater is not expected to be encountered. However, groundwater may be encountered during installation of replacement utility poles. Impacts to water resources and water quality in the vicinity of the Project are expected to be minor and limited to the duration of the construction phase. Long-term impacts are not expected. 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***

In a letter dated April 22, 2011, the U.S. Fish and Wildlife Service (USFWS) determined that habitats for the endangered Small Whorled Pogonia (*Isotria medeoloides*), Pitcher's Thistle (*Cirsium pitcher*), and Piping Plover (*Charadrius meoldus*) are not present in the vicinity of the Project route and, thus, there will be "no effect" on these species. The letter also documented that the Project, if implemented as outlined in the Environmental Assessment, is "not likely to adversely affect" the Indiana Bat (*Myotis sodalis*), the Karner Blue Butterfly (*Lycaeides melissa samuelis*), or Mitchell's satyr butterfly (*Neonympha mitchellii mitchellii*). In a letter dated February 17, 2011, the Michigan Department of Natural Resources (MDNR) also identified nine unique features and State threatened species that are known to occur near the planned Project route. To protect these features and species, MDNR requests that BCI conduct field surveys or desktop habitat analyses prior to land disturbing activities to document that suitable habitat is not present and that the Project will not impact the identified species and features of concern. The construction of two equipment huts is proposed for parcels of land that are already improved with structures, parking lots, and manicured grounds and lawns. As discussed with the USFWS, all underground fiber optic cable installation within Allegan County will use the directional drilling method to minimize or eliminate the potential to disturb the habitat of the Karner Blue Butterfly. If Blue lupine (*Lupinis perennis*) or other sensitive habitats are discovered during any phase of planning or construction, Project activity in that area will halt and efforts such as re-siting will be undertaken to minimize the potential for adverse impacts. If these conditions are met, the Project will have discountable impacts on threatened and endangered species and their habitats.

No long term impacts to ecological resources will occur because the Project will be constructed in previously disturbed areas. Small amounts of vegetation may be disturbed or removed, such as crushing of vegetation by foot, vehicle, or equipment during construction activities. However, no tree or significant vegetation removal is planned. Final re-vegetation will use native species only. Because aerial portions of the Project will be installed on existing utility poles, and because no tall structures will be constructed, no impacts on migratory birds are expected. Neither the USFWS, nor the MDNR, offered comments related to migratory birds within the Upper Michigan Flyway.

Based on these assessments, no significant impacts on biological resources are anticipated to result from Project implementation.

***Historic and Cultural Resources***

In a letter dated February 16, 2010, BCI's contractor made initial contact with the Michigan Historical Center, State Historic Preservation Office (SHPO). BCI provided with the initial letter a description of the Project, maps of the Project area, and an application for National Historic Preservation Act (NHPA) Section 106 consultation. BCI also identified the 9 new building additions in the towns of South Haven, Bangor, Covert, Hartford, Lawrence, Decatur, Lawton, Mattawan, and Gobles. BCI indicated that none of the buildings are known to be historically significant or otherwise eligible for listing on the National Register of Historical Places (NRHP). BCI also identified buildings in the towns of Paw Paw and Bloomingdale in which electronics will be added to the existing telephone company central office buildings. The building in Paw Paw is slightly over 50 years old, and the original portion of the building in Bloomingdale was built in 1957, although a number of additional and remodeling projects have been completed on the building in Bloomingdale. BCI indicated that the addition of the equipment in the Paw Paw and Bloomingdale buildings will not require external modifications to the existing buildings.

On February 16, 2010, BCI's consultant held a phone conversation with the SHPO during which the SHPO requested an updated map for the Project. On February 17, 2010, BCI provided the updated map to the SHPO, which replaced the maps previously provided. In a letter dated March 17, 2010, the SHPO acknowledged receipt of BCI's request for review of the Project, and requested additional information on the Project. Specifically, the SHPO requested photographs, addresses, and the dates of construction for each of the building addition sites.

In a letter dated October 14, 2010, NTIA initiated National Historic Preservation Act (NHPA), Section 106 consultation for historic and cultural resources with the Michigan Historical Center, State Historic Preservation Office (SHPO). NTIA provided a complete description of the Project and maps of the Project area with the submission to the SHPO.

In a letter dated January 28, 2011, BCI submitted to the SHPO an updated Section 106 Review Application, including updated maps of the area of potential effects (APE). This updated application reflected the fact that no additions to existing buildings are planned in association with the Project, thus addressing the SHPO's previous request. In a letter dated March 25, 2011, the SHPO determined that no historic properties will be affected within the Project's identified APE.

On October 22, 2010, NTIA notified 15 Native American tribes of the Project through the Tower Construction Notification System (TCNS). Ten of the 15 tribes indicated no interest in the Project. One tribe, the Pokagon Band of Potawatomi Indians responded on March 29, 2011 indicating that there are Sacred Tribal Mounds in central Van Buren County that may be in the Project area. The Tribe forwarded maps and specific site information to Bloomingdale identifying the exact location of these sites. A comparison of tribal and Project maps indicated that no areas of Project activity will affect the Sacred Tribal Mounds. Bloomingdale responded

to the four remaining tribes requesting additional information about the project. None of the four tribes provided a response to the additional information. However, even tribes expressing no interest in the project requested that in the event that archeological materials, including artifacts and human remains, are encountered during construction, interested tribes will be notified and consultation will resume, as appropriate.

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

***Aesthetic and Visual Resources***

The Project is expected to have short-term, minor visual and aesthetic impacts during the construction period due to the presence of construction equipment, vehicles, and minor land disturbances. Long-term visual impacts associated with the fiber itself will be minimal based on planned installation underground and within existing utility corridors. Visual and aesthetic impacts associated with the two huts and six equipment cabinets will be permanent but minor. Visual impacts may be reduced by placing neutral colored siding on the huts; purchasing huts with a stone aggregate exterior or cement board siding to match surrounding buildings; or implementing landscape screening techniques. Both aerial and buried portions of the Project route are within the viewshed of the state-managed Kal-Haven and Van Buren Trails; aesthetic impacts to these trails will be limited to the construction phase and similar to the effects of current ROW maintenance activities. Based on these assessments, this Project will not negatively affect aesthetic or visual qualities in the region, and will not have significant impacts on aesthetic and visual resources.

***Land Use***

Fiber optic cable to be installed under this Project will be constructed within existing ROWs, and the huts will be installed on parcels of land currently improved with commercial buildings and used by public school facilities. Installation of the six equipment cabinets will result in minor but permanent land use changes to the small pieces of land they are proposed to occupy. There may be some temporary impacts on land use immediately adjacent to the route ROWs during fiber installation, due to the presence of heavy equipment, work crews, and staging areas. However, these impacts are expected to be minor and short-term only. All excavated areas will be restored as nearly as possible to their original condition, and no land will be cleared or fenced. Overall land use throughout the Project area will remain substantially unchanged and no significant impacts to land use are anticipated.

***Infrastructure***

Project construction will occur within existing road and utility ROWs, some of which cross or come into close proximity with numerous railroad lines and spurs. Railroad crossings will be accomplished via aerial installation on existing utility poles or underground installation via horizontal directional drilling. If pole replacement is necessary in these areas, BCI will schedule that work to coincide with operating rail schedules. All work within railway easements will be coordinated with the appropriate railway authorities.

During construction, BCI will use appropriate traffic controls, including signs, lights, barrels, barricades, cones, flags, and speed limit reductions. Construction and installation crews will coordinate with emergency service providers to ensure full access for emergencies during construction. Temporary single lane closures could occur during Project activities. Construction of the two huts and six equipment cabinets will temporarily increase traffic to and from the sites during construction. Traffic will also increase slightly at these sites to facilitate routine maintenance and repair. Nevertheless, impacts to traffic and infrastructure will be negligible over the long term.

Current telecommunications infrastructure within the project area is limited to traditional telecommunication lines and "dial-up" connections. Implementation of this Project will provide high-speed broadband connections to the region. In this way, the Project will have a positive overall impact on infrastructure in Van Buren, Berrien, and Allegan Counties, and is not anticipated to cause significant impacts.

***Socioeconomic Resources***

This Project will provide broadband services and associated opportunities to the currently underserved communities in Van Buren, Allegan, and Berrien Counties. The Project will have no negative effects on minorities or impoverished areas, and will provide increased access to information and education for underprivileged minority communities and economically disadvantaged populations. The availability of broadband services will allow community members to access online educational programs; increase employment opportunities; and create jobs associated with the construction of the fiber loop and long term employment opportunities associated with maintaining the fiber optic network and in the administration of services. Overall, the Project is expected to have a positive impact on socioeconomic resources in the region, and will not cause significant impacts.

***Human Health and Safety***

Much the planned Project activity involves installation of underground fiber optic cable. Thus, there is a potential for contact with contaminated soils or water. Contaminated sites have been identified on properties located along the roadways associated with the Project route, and workers may be exposed to hazardous materials that may have migrated from these sites to adjacent ROWs. To protect human safety and health, all construction activities will be performed by qualified personnel trained in the proper use of the appropriate equipment and all appropriate and customary safety precautions. In the event that environmental contamination is encountered during Project construction (as evidenced by unusual odors, liquids, materials, or stained soils), appropriate response procedures will be implemented, including work area controls, notifications, and subsequent investigations. All appropriate monitoring, handling, and disposal requirements will also be met in order to protect workers, the public, and the environment. No adverse impacts to human health and safety are expected, nor are any significant impacts. Conversely, installation of the fiber optic cable line will improve reliability

of regional telecommunications and result in beneficial long-term impacts on public health and safety.

***Cumulative Impacts***

This Project plans to leverage and tie into Merit's Round 1 REACH Michigan Middle Mile Collaborative project, which independently proposes to build a 955-mile advanced fiber optic network through underserved counties in Michigan's Lower Peninsula. Through the Environmental Assessment process, the Merit project was found to have no significant impacts. The Van Buren Project will also build upon a Round 1 ARRA stimulus grant provided to Michigan State University to create computer centers in Van Buren County. No significant adverse cumulative impacts will result from concurrent implementation of these Projects.

**Decision**

Based on the above analysis, NTIA concludes that constructing and operating the Project as defined by the preferred alternative, identified BMPs, and protective measures, will not require additional mitigation. A separate mitigation plan is not required for the Project. The analyses indicate that the proposed action is not a major Federal action that will significantly affect the quality of the human environment. NTIA has determined that preparation of an EIS is not required.

Issued:

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