



SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT

FOR

COLVILLE CONFEDERATED TRIBES NTIA 2.5GHz WIRELESS, MIDDLE MILE AND FIBER TO THE HOME PROJECT



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LIST OF ABBREVIATIONS AND ACRONYMS

Abbreviation/ Acronym	Full Description
APE	Area of Potential Effect
BIA	United States Bureau of Indian Affairs
CFR	Code of Federal Regulations
CCT	Colville Confederated Tribes
DP	Data Profile
EO	Executive Order
EPA	Environmental Protection Agency
ER	Environmental Review
ESA	Endangered Species Act
FONSI	Finding of No Significant Impact
IPaC	Information, Planning, and Conservation System
ITA	Indian Trust Asset
NAA	No Action Alternative
NEPA	National Environmental Policy Act
NHD	National Hydrography Dataset
NHPA	National Historic Preservation Act
NoaNet	Northwest Open Access Network
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NTIA	National Telecommunications and Information Administration
NWI	National Wetlands Inventory
PA	Project Area
Reclamation	Bureau of Reclamation
SEA	Supplemental Environmental Assessment
TCNS	Tower Construction Notification System
TCP	Traditional Cultural Place
USGS	United States Geological Service
WDFW	Washington State Department of Fish and Wildlife
WNHP	Washington State Natural Heritage Program
WRI	Wetland Resources, Inc.
WSDOT	Washington State Department of Transportation

1.0 INTRODUCTION

1.1 PROJECT BACKGROUND

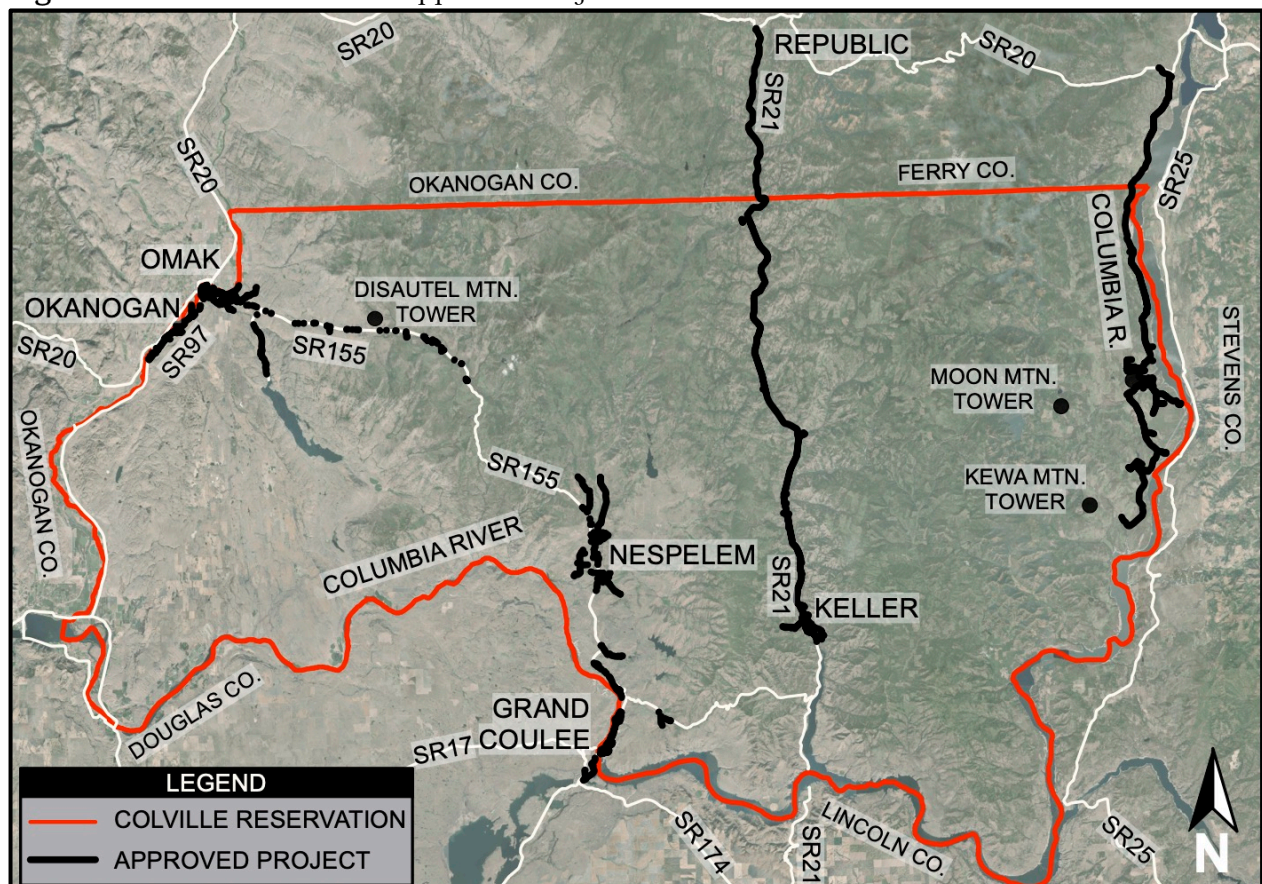
The Colville Confederated Tribes (CCT) applied for a federal grant to fund a large-scale fiber optic cable project on and near the CCT reservation. The grant was awarded by the National Telecommunications and Information Administration (NTIA) through the Tribal Broadband Connectivity Program (Grant Number NT22TBC0290057). NTIA was the lead agency, and the Bureau of Indian Affairs (BIA) and Bureau of Reclamation (Reclamation) accepted cooperating agency status for the Environmental Review (ER) process.

The approved project includes 171.8 miles of new fiber cable, one mile of new aerial electrical distribution, 2.5 miles of buried electrical distribution, three new 195-foot monopoles, 3.4 miles of new road development to provide access to the 195-foot pole sites, 50 new poles, temporary connection to an existing cell-on-wheels site, and a hardware upgrade at an existing 195-foot tower site. The project mostly occurs within the boundaries of the Colville Reservation but extends slightly into unincorporated counties and federally managed lands outside of the reservation.

Table 1 Proposed Development Summary

Fiber – Aerial Cable	Fiber – Buried Cable	Electric - Aerial Cable	Electric - Buried Cable	New Road	195' Poles	40'/50'/100' Poles	Tower Upgrade
98.5 miles	73.3 miles	1 mile	2.5 miles	3.4 mi.	3	50	1

Figure 1 Aerial Overview of Approved Project



1.2 CURRENT STATUS

A Finding of No Significant Impact (FONSI) was issued by NTIA, Reclamation and BIA for the above project on September 30, 2024. Just prior to issuance of the FONSI, Reclamation staff determined that a portion of the project occurring between Coulee Dam and Grand Coulee was not viable due to constrained utility spacing and the presence of solid bedrock along the route. See Section 1.4. A viable alternative route has since been identified. See Section 2.1. See also Figure 2.

This Supplemental Environmental Assessment (SEA) analyzes the proposed alternative route. Modifications to the approved project are limited to what is shown in Figures 3-6 below.

1.3 PROJECT PURPOSE AND NEED

The purpose of the greater project is to provide a network of reliable high-speed broadband internet service throughout the Colville Reservation. The project is needed to address the lack of modern broadband infrastructure on tribal land.

The purpose of the alternative route is to connect the CCT fiber optic network to an existing point of presence near the city of Grand Coulee that does not pass along State Route 155 in the vicinity of the John W. Keys III Pump-Generating Plant.

1.4 NON-VIABLE ROUTE DESCRIPTION

The larger project requires a connection between existing buried fiber infrastructure located in the town of Coulee Dam and the internet point of presence¹ known as the NoaNet Regeneration Station Site, which is herein referred to as the NoaNet Comm Hut. Existing fiber infrastructure terminates within a buried vault located beneath Lincoln Ave at approximately 10 Lincoln Ave. The NoaNet Comm Hut is just outside the city limits of Grand Coulee in unincorporated Grant County. See Figure 2.

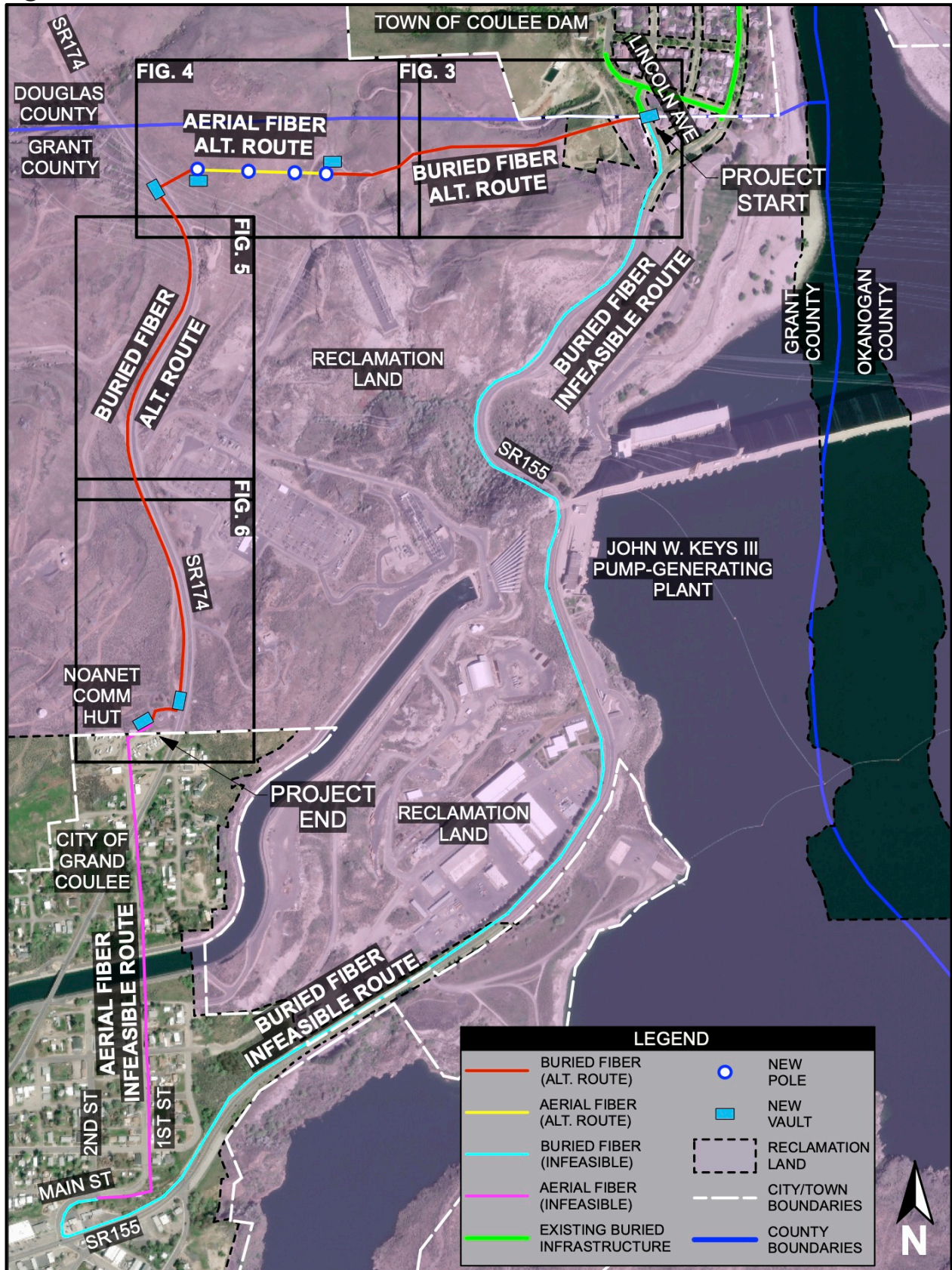
The initial engineered design connected existing fiber with the NoaNet Comm Hut as a mix of buried fiber in new conduit and aerial fiber affixed to existing electrical distribution service. New buried conduit/fiber was proposed along Lincoln Ave, then south along the west side of SR155 past the John W. Keys III Pump-Generating Plant. The route entered Grand Coulee as buried conduit/fiber along the north side of SR155 and continued to approximately the intersection of Main Street and 2nd Ave.

From Main Street and 2nd Ave, new conduit would transition to aerial fiber hanging on existing electrical distribution service poles. The route followed the east side of 1st Ave north to an existing crossing over the Banks Lake Diversion Canal. The project would continue north along 1st Street, crossing SR174 and the Grand Coulee RV Park before terminating at the NoaNet Comm Hut.

During their review of the engineered site plan, Reclamation real estate staff notified the applicant that a section of the proposed route required penetrating solid rock and risked impacting critical dam underground utilities in the vicinity of the John W. Keys III Pump-Generating Plant. Reclamation staff worked with the applicant to identify an alternative route to make connection between existing infrastructure and the NoaNet Comm Hut. See Section 2.1 below.

¹ A point of presence is a physical location where two or more networks or devices share a connection, often acting as a local access point for an internet service provider.

Figure 2 Aerial Overview of Non-Viable and Alternative Routes



2.0 PROPOSED ACTION

2.1 INTRODUCTION

Pursuant to Council on Environmental Quality regulations for implementing NEPA, both a No Action Alternative (NAA) and the alternative route are presented in this section. The NAA is intended to provide a benchmark to allow decision makers and the public to compare the levels of environmental effects of the proposed action with an alternative where the project does not occur.

2.2 NO ACTION ALTERNATIVE

Under the NAA, the final connection between the greater project and the NoaNet internet point of service (NoaNet Comm Hut) would not be constructed. This alternative would leave CCT residents, businesses, and government with current levels of service (i.e. limited access to the internet) because failure to provide the final connection point would also eliminate the greater project.

This alternative would forgo the social, economic, and health benefits of providing a more complete network and faster speeds of cable internet to the CCT and would hinder future economic development in the area. The NAA would not result in any ground-disturbing work, including all development proposed as part of the larger project because failure to complete the alternative route would necessitate abandonment of the larger project.

2.3 ALTERNATIVE ROUTE DESCRIPTION

With support from Reclamation engineers and CCT representatives, an alternative route was identified on lands administered by Reclamation north and west of the Grand Coulee Dam. The alternative route avoids bedrock and dam infrastructure along SR155 and significantly shortens the overall length of the segment. See Figures 3-6. See also Appendix B.

The alternative route provides connection between the terminus of existing buried infrastructure and the internet point of service at the NoaNet Comm Hut, which is a concrete structure that houses sensitive electronic equipment for providing fiber optic telecommunications services. The route begins near the Columbia River Inn property at 10 Lincoln Ave and ends near the Grand Coulee RV property at 22714 E Highway 174.

The alternative route starts at an existing splice case beneath the road surface of Lincoln Ave. The route crosses west-southwest into Grant County within the Columbia River Inn property (Grant Co. tax parcel 010007000) and a parcel owned by the town of Coulee Dam (Grant Co. tax parcel 010008000), both of which are managed by Reclamation. The route continues west through a second parcel owned by the town of Coulee Dam (Grant Co. tax parcel 010009000) that is not managed by Reclamation before entering a 320-acre parcel owned by the United States of America and managed by Reclamation (Grant Co. tax parcel 182116000). See Figure 3.

The route exits 182116000 and continues west through a 320-acre parcel owned by the United States of America and managed by Reclamation (Grant Co. tax parcel 182117000). See Figure 4. After entering a WA Dept. of Transportation easement along SR174, the route continues south within Grant County tax parcel 182117000, which is managed by Reclamation. See Figure 5. The project continues south along the west side of the highway within the WSDOT easement and parcel 182117000 before turning west into the NoaNet Comm Hut site. See Figure 6.

Figure 3 Viable Alternative Route – Northeast (Project Start)

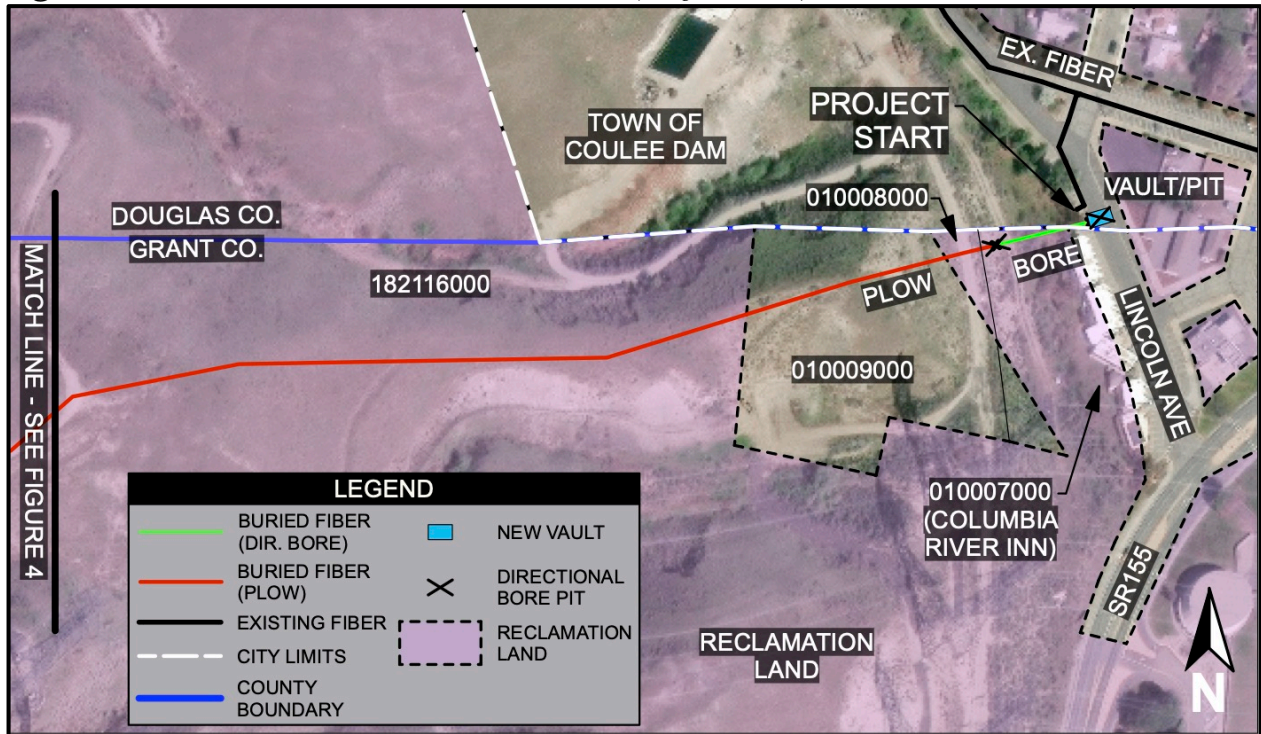


Figure 4 Viable Alternative Route - Northwest

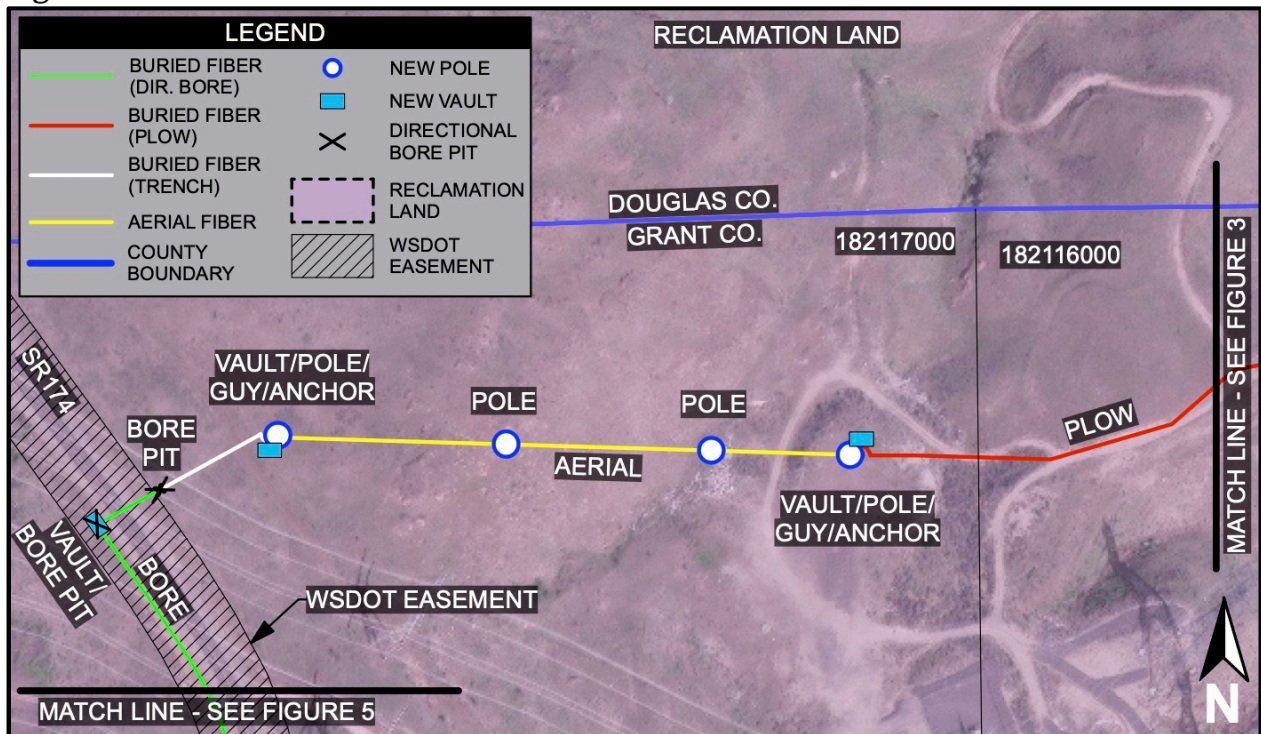


Figure 5 Viable Alternative Route - West

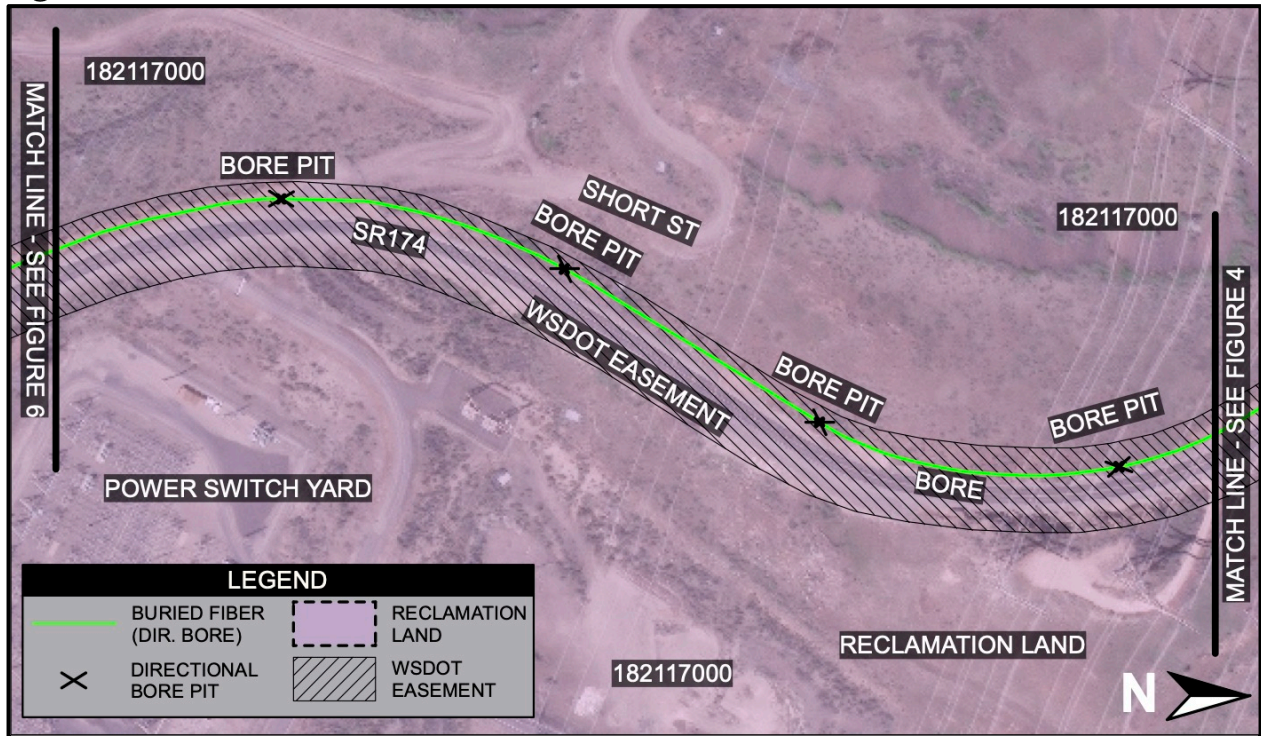
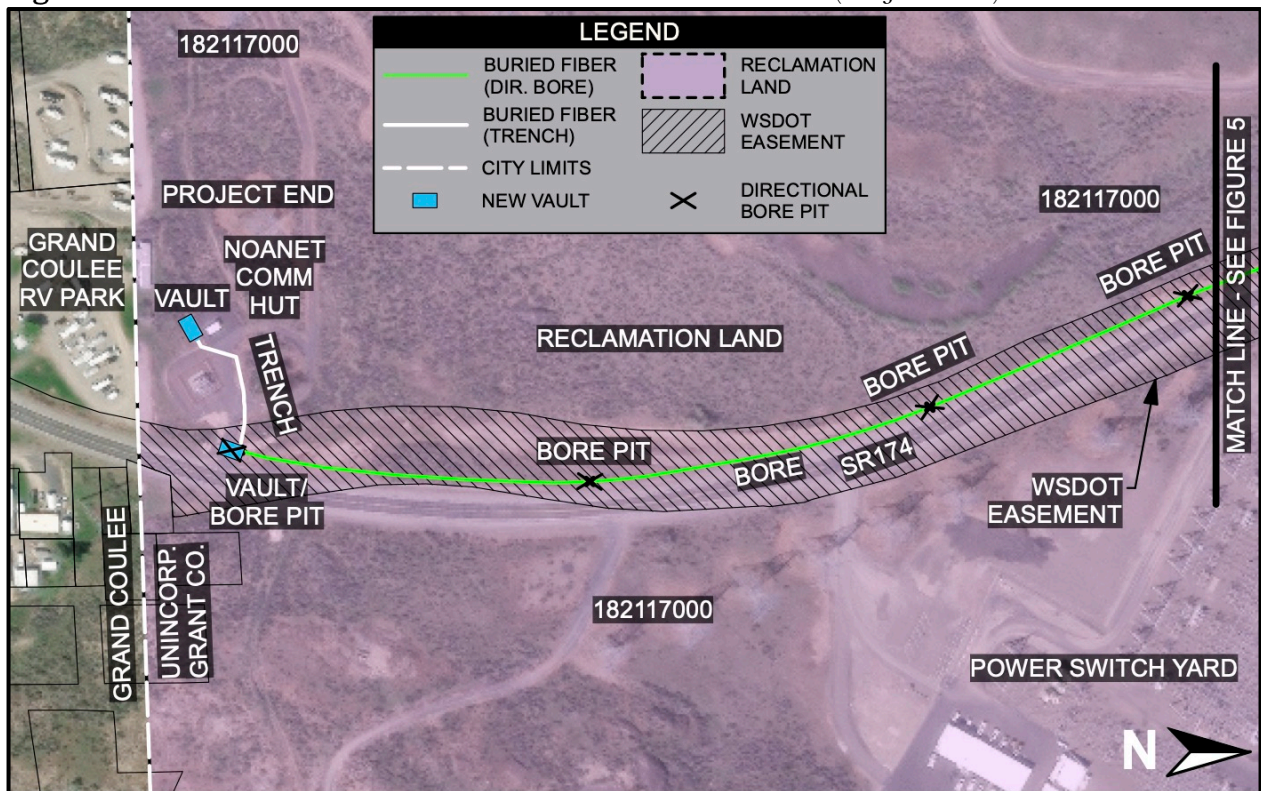


Figure 6 Aerial Overview of Viable Alternative Route – South (Project End)



The alternative route includes 1.27 miles of buried fiber in new conduit that will be installed by a mix of directional boring (4,070 feet), plow (2,200 feet), and trenching (435 feet). Six vaults will be installed along the route. The alternative route includes 875 feet of new aerial fiber hanging along four new 34-foot (above grade) ductile iron poles that are needed to clear a solid rock outcropping. A site plan is provided as Appendix B.

In consideration of the alternative route, the total length of installed fiber cable for the project is reduced by 1.3 miles. The greater project now includes 170.5 miles of new fiber cable, one mile of new aerial electrical distribution, 2.5 miles of buried electrical distribution, three new 195-foot monopoles, 3.4 miles of new road development to provide access to the 195-foot pole sites, 50 new poles, temporary connection to an existing cell-on-wheels site, and a hardware upgrade at an existing 195-foot tower site. See Table 2.

Table 2 Revised Development Summary

Fiber – Aerial Cable	Fiber – Buried Cable	Electric - Aerial Cable	Electric - Buried Cable	New Road	195’ Poles	40’/50’/ 100’ Poles	Tower Upgrade
98 miles	72.5 miles	1 mile	2.5 miles	3.4 mi.	3	50	1

2.4 PROPERTY OWNERSHIP AND GOVERNANCE

Proposed development occurs in unincorporated Grant County (1.27 miles buried, 875 feet aerial), within the town of Coulee Dam (36 feet buried), within a WSDOT easement (0.73 miles buried) and within lands administered by Reclamation (1.13 miles buried, 875 feet aerial). See Figures 3-6 above.

2.4.1 Construction Techniques

The alternative route involves aerial fiber deployment along four newly installed 34-foot ductile iron poles, and new underground fiber that will be installed by plow, trench, or directional bore.

Aerial Fiber

Aerial installation is needed to span a bedrock outcropping on lands administered by Reclamation between Lincoln Ave and SR174. Four new poles will be set using a pole truck (boom with auger attachment). New poles require excavation using a mechanical auger. The temporary disturbance area is two square feet, and each pole will be set 6.5 feet below grade and 34 feet above grade. Access is via existing dirt roads and pole staging is along existing dirt roads and dirt parking lots managed by Reclamation. At the two end poles, buried fiber terminates within a vault and is routed to the framing via pole riser. One down guy and one anchor are needed at the beginning and end of the aerial span. Cable will be secured to the framing hardware and properly sagged using a boom truck.

Equipment used for aerial installation includes:

- Boom lift truck
- Line truck
- Support truck
- Trailer
- Reel loader truck

Buried Fiber

Buried fiber is the preferred method of construction. Underground installation will occur from Lincoln Ave west to SR174, and south to the NoaNet Comm Hut along the west side of SR174. The depth of buried cable is approximately 24 inches below the surface and is contained in polyethylene conduit. In general, all conduit will be located less than 48 inches below the ground surface, except where boring under roads and other obstructions necessitates greater cable depth. Cable burial depth will be based on federal, state, and local standards where boring is necessary.

To accommodate buried fiber installation and future maintenance, six hand-hole vaults will be installed along the route. Vaults will be installed where aerial fiber transitions to buried, and at approximately 500-foot intervals along the buried route. Along the buried route, handhole vaults are installed after conduit burial is completed. Buried cable is pulled through conduit after installation of the vault. The proposed vaults are 30"x 48" and will be buried 36 inches below grade. A 42"x60" temporary ground disturbance area will be excavated to 36 inches below grade, the handhole vault will be set in the hole, and spoils will be used to backfill the area surrounding the vault based on state and federal soil restoration requirements.

Cable will be installed using a combination of techniques: plow, trench, or directional bore. Plowing is the preferred method because it is the least invasive construction technique. A plow excavates an approximately three-inch width using a shear that leads a reel of conduit. The shear starts at a splice point. The shear opens a trench, conduit follows, and the trench is backfilled with spoils from the shear path (no imported backfill is needed). Plowing will be implemented for most of the buried route between the project start (Lincoln Ave) and SR174.

Trenching involves similar equipment to plowing, but the excavation is wider (four to 24 inches). Trenching physically removes the soil from the trench slot and requires imported backfill depending on soil conditions. A conduit is buried in the trench and then backfilled. Cable is pulled after vault installation is complete. Trenching will be implemented in two short sections: between aerial fiber and the proposed bore beneath SR174, and to make final connection at the NoaNet Comm Hut.

Boring uses a directional drill to avoid impacts to waterways, concrete, asphalt, and cultural resources. Disturbance is limited to an entrance pit and exit pit that each require an approximately two-foot by four-foot impact area. The drill penetrates at the entrance pit and arcs to maximum depth needed to clear the obstacle before arcing back up to the surface at the exit pit. The first pass creates a pilot hole, which is widened using a reamer, then conduit is pulled from the exit pit back to the entrance pit. Bore pits are lined with an impermeable blanket that collects excess fluids, which are pumped into a truck-mounted holding tank. If necessary, fluid disposal occurs at an approved off-site disposal facility. No fluid additives are proposed. Directional bores will be used at the project start beneath Lincoln Ave and all along SR174.

Equipment used for buried installation includes:

- Tracked plow cat
- Tracked pull cat
- Tracked clean-up cat
- Backhoe
- Directional boring machine
- Trencher
- Cable reel truck and trailer
- Vibratory plow
- Tractor trailer transport semi
- 3/4 & 1 ton trucks
- Water truck
- Dump truck
- Rock saw
- Air compressor

Ground Disturbance

Temporary ground disturbance will occur as follows:

- Plowing/trenching new conduit
- Surrounding the pole location
- Directional bore entrance and exit pits
- Trenching between bore vaults and pole risers

Permanent ground disturbance will occur as follows:

- Installation of vaults
- Installation of new poles

Long-Term Operation and Maintenance Activities

Long-term operation includes occasional maintenance along the aerial and buried route as repairs or upgrades are deemed necessary. Vegetation removal is not anticipated.

3.0 ENVIRONMENTAL BASELINE AND EFFECTS ANALYSIS

The affected environment is defined as 300 feet from all proposed development activities associated with the alternative route. This area is herein referred to as the Project Area (PA). This section analyzes the PA in the context of potential environmental impacts related to 11 broad resource types.

In summary, the proposed alternative alignment will not result in significant negative impacts to any of the broad resource types. The NAA similarly does not result in significant negative environmental impacts but lacks the projected benefits to socioeconomic resources and human health and safety. Summary findings by resource type are presented in Table 3 below.

Table 3 Summary of Environmental Effects

Resource Type	Preferred Alternative	No Action Alternative
Noise	No significant negative environmental impacts	No impact
Air Quality	No significant negative environmental impacts	No impact
Geology and Soils	No significant negative environmental impacts	No impact
Water Resources	No significant negative environmental impacts	No impact
Biological Resources	No significant negative environmental impacts	No impact
Historic and Cultural Resources	No significant negative environmental impacts	No impact
Aesthetic and Visual Resources	No significant negative environmental impacts	No impact
Land Use	No significant negative environmental impacts	No impact
Infrastructure	No significant negative environmental impacts	No impact
Socioeconomic Resources	No significant negative environmental impacts	Negative impact due to lack of access to broadband.
Human Health and Safety	No significant negative environmental impacts	Negative impact due to lack of access to broadband

3.1 NOISE

3.1.1 Noise - Background

The alternative route occurs near the edge of SR174 and in infrequently used areas on lands administered by Reclamation. Based on cursory review of the WSDOT Biological Assessment Preparation for Transportation Projects noise assessment guidance (WSDOT, 2013), A-weighted decibel volume for traffic along state highways in the PA is between 65-70, and approximately 60 for rural roads.

Based on review of heavy equipment needed to construct the project, temporary construction noise impacts could reach up to 100 decibels at 50 feet (WSDOT 2013). Therefore, short-term noise impacts associated with construction equipment will exceed ambient or background noise levels within the PA.

3.1.2 Noise - Impacts

Direct noise impacts are only anticipated for equipment operators and other construction workers. Residents of Grand Coulee and Coulee Dam are not likely to be disrupted due to the relatively small delta between normal highway noise and construction noise. Terrestrial species located near project construction may exhibit a behavioral response to construction noise (e.g. startle, re-directed attention, re-location farther from the noise source), but significant impacts (e.g. physical injury, increased predation risk) are not anticipated because the delta between background noise and project construction is small, and because noise-generating work is short in duration.

Short-term noise impacts to equipment operators and workers will be mitigated by ensuring that workers follow Occupational Safety and Health Administration standards for hearing protection.

No significant noise impacts are expected.

3.1.3 Noise - No Action Alternative

No short-term alteration of noise levels would result from the NAA. The NAA would not cause any significant direct, indirect, short-term, long-term, or cumulative noise impacts.

3.2 AIR QUALITY

3.2.1 Air Quality - Background

Based on review of the Washington State Department of Ecology Air Quality Program, Eastern Washington meets attainment standards for all six federally regulated air pollutants (carbon monoxide, ground-level ozone, lead, nitrogen dioxide, particulate matter, and sulfur dioxide).

3.2.2 Air Quality - Impacts

Construction will generate some particulate matter where soil is disturbed for pole and conduit/fiber installation. Construction vehicle emissions will generate negligible air quality impacts. Dust suppression and minimized equipment idling, as specified in the project Stormwater Pollution and Prevention Plan, will mitigate potential environmental impacts.

No significant air pollution impacts are expected.

3.2.3 Air Quality - No Action Alternative

The NAA would not result in any significant direct, indirect, short-term, long-term, or cumulative air quality impacts.

3.3 GEOLOGY AND SOILS

3.3.1 Geology and Soils - Background

The alternative route is located in the Columbia Plateau physiographic region (Pater 1998). The project occurs in a mix of glacial outwash, alluvium, outburst flood deposits, and volcanic rock. The Natural Resource Conservation Service (NRCS) maps nine soil types in the PA. See Table 4.

Table 4 NRCS Mapped Soil Units in PA

Map Unit Name	Disturbance Proposed	Farmland*	Farmland Classification
Badge-Bakeoven complex	No	No	Not Prime Farmland
Bakeoven-Touhey complex	No	No	Not Prime Farmland
Benco gravelly loam	Yes	Yes	Farmland of Statewide Importance
Ellisforde silt loam	Yes	Yes	Farmland of Unique Importance
Entiat-Rock outcrop complex	Yes	No	Not Prime Farmland
Kiona-Rock outcrop complex	No	No	Not Prime Farmland
Quincy loamy fine sand	Yes	Yes	Farmland of Unique Importance
Touhey very fine sandy loam	Yes	Yes	Farmland of Statewide Importance
Quincy-Ellisforde-Cashmere complex	Yes	No	Not Prime Farmland

*Pursuant to Farmland Definition in 7 CFR 658.2

3.3.2 Geology and Soils - Impacts

Ground disturbance occurs only within the upper 24-48 inches of the soil surface. No significant impacts at the geologic scale are anticipated.

Ground disturbance is proposed within six of the NRCS-mapped soil types described in Table 4. Four of the impacted soil types meet the Farmland definition presented in Title 7, Part 658.2 of the Code of Federal Regulations (CFR). Based on communication with the NRCS Washington State Resource Soil Scientist (Max Ross), this project is exempt from Farmland Protection Policy Act regulations because it qualifies as a “corridor subsurface project.” Furthermore, the project does not require development of a soil disturbance/removal and reconstruction plan because it will not alter any agricultural land use. The corridor subsurface exemption is found in Section 523.11.E.2 of the Farmland Protection Policy Manual, which is part of the NRCS Electronic Directives System. The NRCS consultation for this project is described in greater detail in Appendix E.

As depicted in Figure 7 below, modifications to soils will occur on federally managed lands and in the right-of-way of a rural highway (SR174). Proposed development will not alter agricultural land uses because they are absent from the PA.

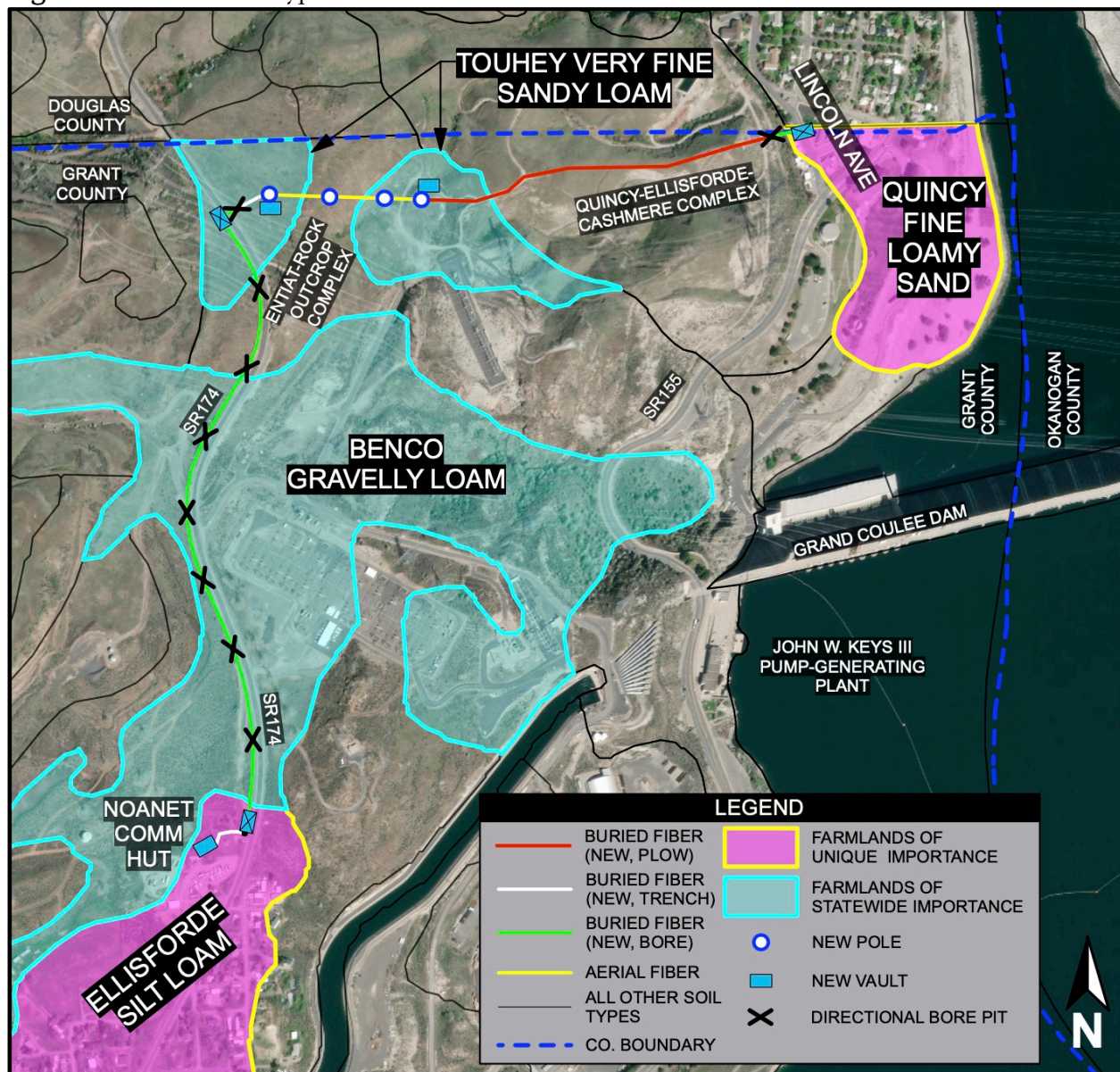
The project will temporarily disturb the upper 24-48 inches of the soil surface. All temporarily disturbed soils will be immediately restored based on WSDOT or Reclamation standards as described in Appendix B.

No significant soil impacts are expected.

3.3.3 Geology and Soils – No Action Alternative

The NAA would not result in any change to geologic or soil conditions. No significant direct, indirect, short-term, long-term, or cumulative impacts to geology or soils would be anticipated.

Figure 7 NRCS Soil Types in PA

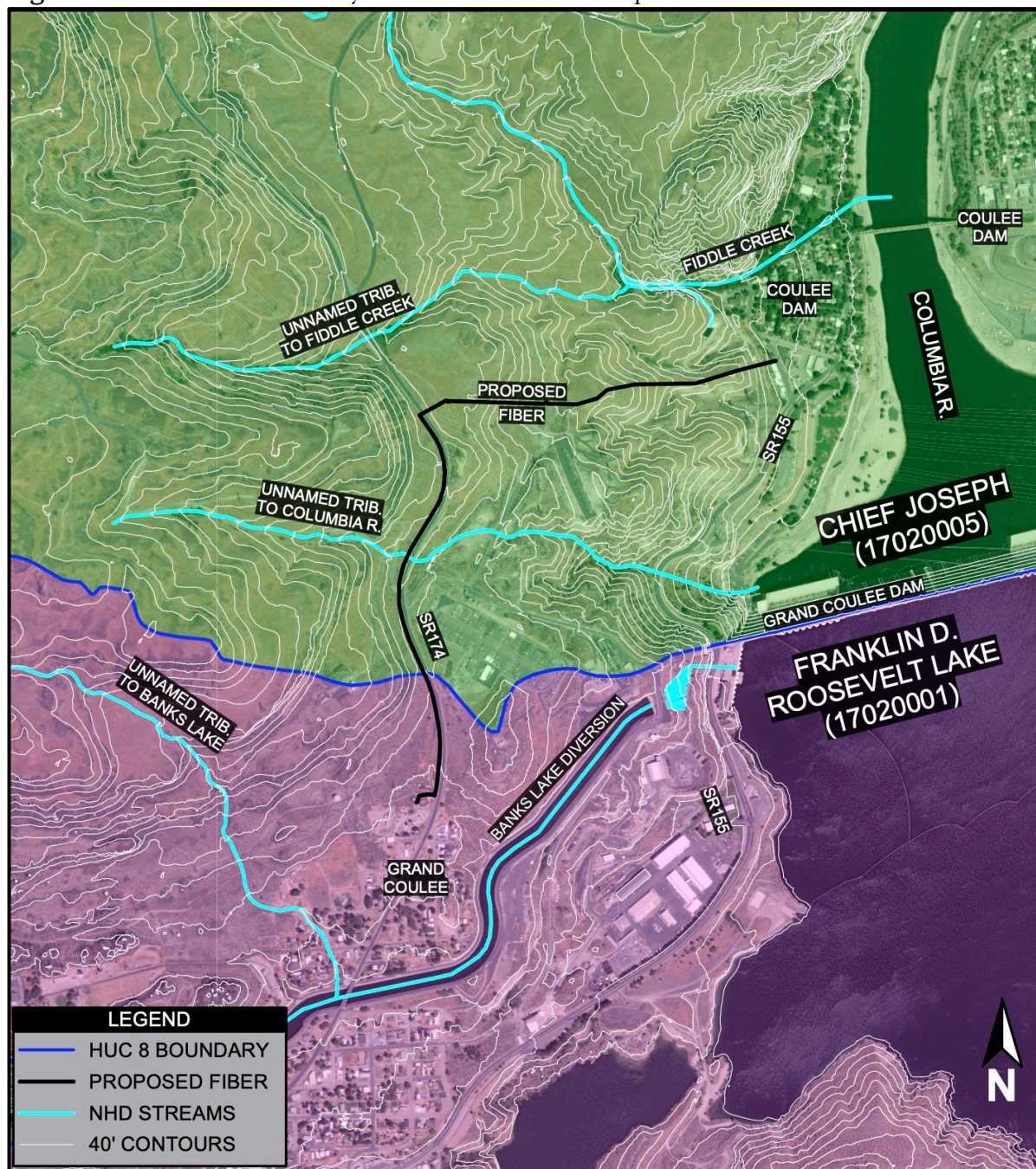


3.4 WATER RESOURCES

3.4.1 Surface Water – Background

The alternative route occurs along the boundary of two major sub-basins: Chief Joseph and Franklin D. Roosevelt Lake as defined by the United States Geological Survey (USGS 2025). Based on USGS National Hydrography Dataset (NHD) mapping, proposed development includes one crossing of a mapped feature along SR174. The feature is referred to in this document as the Unnamed Tributary to the Columbia River. See Figure 8.

Figure 8 Watershed Boundary and Surface Waters Map



3.4.2 Surface Water – Impacts

No streambed or bank was observed in the vicinity of the Unnamed Tributary to the Columbia River based on review of historic photographs (Google Streetview, Google Earth). The existence of a narrow channel consisting of sorted cobble is possible based on a visible culvert outlet that can be seen in Figure 9. If present, this watercourse is an ephemeral feature that likely only flows briefly during periods of winter/spring snowmelt and/or during heavy precipitation events. All other proposed work will occur outside of mapped surface waters.

Figure 9 Mapped Surface Water in Project Area



Fiber will be buried beneath the channel using a directional bore, which will ensure that no direct impacts occur. Furthermore, construction will occur while the channel is dry and appropriate erosion control best management practices will be employed. The crossing is not expected to impact the Unnamed Tributary to the Columbia River (if present).

No surface water impacts are expected.

3.4.3 Groundwater – Background

Water enters the PA as rain, snowmelt, or from streams. Most water collects in minor tributary streams and infiltrates or flows directly to the Columbia River. Based on comparison with the EPA Sole Source Aquifer map, no sole source aquifers are present in the PA.

3.4.4 Groundwater – Impacts

This project will not alter the quantity, timing, or path of groundwater movement. No groundwater impacts are expected.

3.4.5 Coastal Zone, Estuary, and Inter-Tidal Areas – Background

The alternative route is located within an inland portion of Washington state. No coastal zones, estuaries, or inter-tidal areas occur on or near the PA.

3.4.6 Coastal Zone, Estuary, and Inter-Tidal Areas – Impacts

No coastal zone, estuary, or inter-tidal impacts are expected due to their absence from the PA.

3.4.7 Floodplains – Background

WRI reviewed Federal Emergency Management Agency Flood Insurance Rate Maps to determine the extent of the regulatory floodplain along the alternative route. The project does not occur in any mapped floodplains.

3.4.8 Floodplains – Impacts

No floodplain impacts are expected due to their absence from the PA.

3.4.9 Wetlands – Background

Wetlands are defined in the CWA (33 CFR 328.3) as “areas that are inundated or saturated by surface or ground water at a frequency and duration to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions.”

Wetlands in the United States are coarsely mapped by the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) based on continental-scale computer modeling. One wetland feature is mapped by NWI in the PA. The feature is a linear polygon classified as R4SBC. This code description is used for wetlands contained entirely within a stream channel, with intermittent flow characteristics, and with seasonal flooding that occurs in the early growing season. The feature closely follows the path of the Unnamed Tributary to the Columbia River depicted in Figures 8 and 9 above. The buried route will cross this feature along the edge of SR174 using a directional bore, which will avoid all impacts to the ground surface.

NWI wetland features are based on very coarse-scale mapping, and ground truthing is not employed by NWI to improve the accuracy of their depicted boundaries. For this reason, wetland ecologists do not rely heavily on them for making presence or absence determinations at the site scale. Site-scale investigation techniques such as field delineation or imagery review are a more appropriate methods to determine wetland presence in the PA.

Physical site investigation is not part of the scope of work for this project. For this reason, wetland presence/absence is determined based on in-office review of recent and historic imagery (Google Streetview, Google Earth). This effort was conducted by a Professional Wetland Scientist (SEA author Niels Pedersen). The following represents the findings of the in-office review.

- A streambed (i.e. defined bed and bank) was not observed between the existing culvert depicted in Figure 9 above and the road prism of SR174
- The slope between the existing culvert and the road prism is too steep to provide sufficient residence time to support seasonal flooding
- The area between the culvert and the road prism appears to drain via buried culvert beneath SR174, which further reduces residence time and seasonal flooding potential
- Persistent or emergent wetland vegetation appears to be absent
- Wetland hydrology (e.g. seasonal flooding) appears to be absent

Based on in-office review, no wetlands are present in the PA.

3.4.10 Wetlands – Impacts

No wetland impacts are expected due to their absence from the PA. Furthermore, if a wetland is present in the mapped location, it will be crossed via directional bore and no impacts will occur.

3.4.11 Wild and Scenic Rivers – Background

Based on comparison with the National Park Service Wild & Scenic Rivers map viewer, no designated Wild and Scenic Rivers are located on or near the PA.

3.4.12 Wild and Scenic Rivers – Impacts

No impacts to Wild and Scenic Rivers are expected due to their absence from the PA.

3.4.13 Water Resources – No Action Alternative

The NAA would not result in any change to surface waters, groundwater, floodplains, or wetlands. No significant direct, indirect, short-term, long-term, or cumulative impacts to water resources would be anticipated.

3.5 BIOLOGICAL RESOURCES

3.5.1 Ecoregions - Background

The EPA has divided the continental United States into ecoregions by ecological similarity. The alternative route occurs in the Channeled Scablands (Level IV) ecoregion. Ecoregions are subdivided into Levels I, II, III, and IV based on geology, landforms, soils, vegetation, climate, land use, wildlife use, and hydrology. See Table 5.

Table 5 Biological Site Description – EPA Ecoregions

EPA Ecoregions				
Level I		Level II	Level III	Level IV
North American Deserts		Cold Deserts	Columbia Plateau	Channeled Scablands

Channeled Scablands

This physical description is based on research conducted by Sharon Clarke and others (Clarke 1997). The Channeled Scablands ecoregion formed as periodic floods from glacial Lake Missoula scoured out thick soils (loess) over basalt and re-deposited the loess along the edge of the main flood channels. Patterned ground covers basalt plateaus bordering the main flood channels. These scabs are composed of mounds of loess surrounded by rock fragments. Mineral soil is typically a thin veneer on the basalt surface. The Channeled Scablands are generally too arid to support tree growth and are instead dominated by stiff sage and Sandberg's bluegrass.

3.5.2 Ecoregions - Impacts

The project will temporarily disturb the mineral soil surface and will temporarily remove some vegetation that is characteristic of the ecoregion. These impacts will not reduce the area or diminish the value of the Channeled Scablands ecoregion.

No ecoregion impacts are expected.

Figure 10 Channeled Scablands in Project Area



3.5.3 Wildlife and Vegetation - Background

The proposed project occurs in a shrub-steppe ecosystem, which historically covered over 10 million acres in Washington State. Shrub-steppe refers to the dominant components of this ecosystem: shrubs and perennial bunchgrasses (steppe). Native vegetation in this environment is dominated by layered sagebrush, perennial grasses, and short vascular plants, all of which are rooted in a cryptogamic crust composed of lichen and mosses. Based on wildlife surveys conducted by WDFW, over 200 bird species, 30 species of mammals, and numerous species of reptiles, amphibians, and insects depend on shrub-steppe habitat (WDFW 2025a). Discussion of federally protected species in the PA are discussed separately in Sections 3.5.9 and 3.5.10 below.

3.5.4 Wildlife and Vegetation - Impacts

Project construction between Lincoln Ave and SR174 will temporarily impact shrub-steppe vegetation and may disrupt non-listed terrestrial wildlife. The PA along SR174 no longer provides shrub-steppe habitat because it is a disturbed ROW, and any terrestrial wildlife in the area is expected to be habituated to anthropogenic disturbance along SR174. Due to the limited total length of ground-disturbing fiber installation in undisturbed areas (2,070 feet plowing, 230 feet trenching) and the narrow width of disturbance (three inches for plowing, 14 inches for trenching), vegetation and wildlife impacts are not considered significant impacts. Disturbed shrub/emergent vegetation is likely to recover within several growing seasons, and wildlife disturbance is likely limited to minor behavioral modification. Furthermore, no tree removal is proposed, and staging will occur on existing dirt surfaces (e.g. existing roads and parking lots).

No significant impacts to non-listed wildlife or vegetation are expected.

3.5.5 Migratory Birds and Birds of Conservation Concern - Background

The Migratory Bird Treaty Act prohibits any activity resulting in take of migratory birds unless permitted by the USFWS. In addition, Executive Order (EO) 13186 compels federal agencies that authorize activities that might affect migratory birds to identify potential impacts and implement conservation measures where appropriate.

The PA occurs along the Pacific Flyway, one of four major migratory routes in North America, and within the Great Basin conservation region (USFWS 2021). Within the Great Basin conservation region, 34 species of concern are identified. Identified species are within the following genera: grebe, swift, hummingbird, rail, avocet, snowy plover, godwit, knot, sandpiper, yellowlegs, gull, tern, pelican, harrier, owl, woodpecker, flycatcher, jay, thrasher, grosbeak, finch, crossbill, meadowlark, and warbler.

3.5.6 Migratory Birds and Birds of Conservation Concern - Impacts

Human threats to migratory birds broadly include habitat loss/degradation, collisions with man-made structures, and climate change. Features of the alternative route that could impact migratory birds include habitat alteration (permanent placement of several vaults) and collision (placement of two guy wires, four poles, and hanging aerial fiber between four new poles). The placement of six 30"x48" vaults represents de minimus habitat alteration, but installation of two guy wires and 875 lineal feet of aerial cable merits additional consideration.

Data availability for wire collisions focuses on electrical transmission wires (>60kV), which are typically much higher above the ground surface than proposed fiber along the alternative route. There is limited research support for collision risk from electrical distribution wire (2.4kV-60V), and essentially no research for non-electric aerial utility infrastructure collisions. Median estimates of annual bird mortality in the United States from collisions with high-voltage electrical transmission lines, excluding electrocution loss, is 20 million (Loss, Will, and Marra 2014).

Limited data availability for aerial fiber optic cable or electrical distribution wire collisions requires extrapolation from the findings of transmission wire collision data analysis. In general, migration occurs at altitudes that exceed the height of proposed cable (34 feet maximum), unless birds are landing or in a sedentary period of migration (Loss, Will, and Marra 2014). Additionally, line orientation for transmission lines commonly includes short distances between multiple wires, which creates additional collision risk that is not present for single-wire installations.

No wetlands or other high-value migratory bird habitat are present in the vicinity of the proposed aerial line, which indicates that migratory birds have no specific reason to land in the PA. Proposed guy wires and all 875 feet of hanging cable will be 34 feet or less above ground level and will consist of one wire, which is much lower above the ground surface than migratory flight patterns. Additionally, the hanging line is just 150 feet from a corridor of high voltage transmission lines and towers, which implement bird collision minimization measures (e.g. flashing lights, ridgeline avoidance) that would further discourage migratory birds from traveling in the aerial portion of the PA.

No significant impacts to migratory birds are expected and no minimization measures are proposed.

3.5.7 Fish Use - Background

Based on the National Hydrography Dataset, one stream (Unnamed Tributary to Columbia River) is potentially located in the PA. Downstream of the PA, this stream has an average channel gradient of 23% and a mapped outlet to the Columbia River. Based on review of aerial imagery, there is no continuous channel between the PA and the Columbia River. The channel gradient between the PA and the Columbia River exceeds the state-defined maximum 20% threshold for fish use in Eastern Washington (WAC 222-16-031.3.a.i.B). Furthermore, there is no resting, forage, cover, or rearing habitat anywhere in the basin based on review of aerial imagery.

3.5.8 Fish Use - Impacts

Fish presence in the PA is not anticipated due to natural constraints and the absence of habitat in the sub-basin. Temporary construction impacts (e.g. erosion) are not expected to impact downstream areas where fish could be present, due to adequate physical separation (0.6 miles), the lack of a surface connection between known fish-bearing waters and the PA, and due to erosion control measures and site restoration consistent with state and federal standards.

No impacts to fish are expected.

3.5.9 Threatened and Endangered Species – Background

WRI reviewed the following databases to determine the likelihood that species protected under the Endangered Species Act (ESA) are present within the PA.

- USFWS Information, Planning and Conservation System (IPaC); see Appendix A
- National Oceanic and Atmospheric Administration Protected Resources App
- WA Natural Heritage Program (WNHP) Rare Plant and Ecosystem Locations Mapper
- WA Department of Fish and Wildlife (WDFW) Threatened and Endangered Species List
- WDFW Priority Habitats and Species on the Web
- WDFW SalmonScape Map

Federally protected species that are potentially present within the PA, as described by IPaC, are listed below in Table 6. Proposed species are listed in Table 7. Brief life history requirements and likelihood of species occurrence within the PA are discussed below for each species, including effect determinations.

Table 6 Threatened or Endangered Species in Project Area

Common Name	Latin Name	Federal Status	Critical Habitat in Project Area	Effect Determination
Fish				
Bull Trout	<i>Salvelinus confluentus</i>	Threatened	None	No Effect
Birds				
Yellow-billed Cuckoo	<i>Coccyzus americanus</i>	Threatened	None	No Effect
Flowering Plants				
Spalding's Catchfly	<i>Silene spaldingii</i>	Threatened	None	No Effect

Table 7 Proposed Species in Project Area

Common Name	Latin Name	Federal Status	Critical Habitat in Project Area	Effect Determination
Insects				
Monarch butterfly	<i>Danaus plexippus</i>	Proposed for Listing	N/A	No Effect
Suckley's cuckoo bumble bee	<i>Bombus suckleyi</i>	Proposed for Listing	N/A	No Effect

3.5.10 Threatened and Endangered Species - Impacts

Bull trout (*Salvelinus confluentus*)

Bull trout are a geographically widespread char native to North America. They are piscivorous and can spawn multiple times (Reiss, 2012). Bull trout spawn in the fall in cold, high elevation headwater streams. Juveniles spend two to four years rearing in their natal streams and then migrate to a mainstem river (fluvial), a large lake/reservoir (adfluvial), or remain in their natal stream as a resident population (Dunham, 2003).

Consistent with the findings presented in Section 3.5.10 above, the absence of suitable habitat due to natural constraints including channel gradient, lack of a surface connection to known fish-bearing waters, and absence of suitable habitat features in the PA, supports the No Effect finding for bull trout.

Due to their absence from the PA, this project will have No Effect on bull trout.

Yellow-billed Cuckoo (*Coccyzus americanus*)

The yellow-billed cuckoo winters in Central and South America and migrates to North America for breeding. The yellow-billed cuckoo strongly prefers continuous riparian habitat comprised of cottonwoods and willows for nesting (Hughes 1999).

Although the alternative route occurs in the historic range of the yellow-billed cuckoo, the species no longer breeds in Washington (Federal Register 2014) and is considered functionally extirpated (Wiles et. al. 2017). Yellow-billed cuckoo is not present in the PA.

Due to their absence from the PA, this project will have No Effect on yellow-billed cuckoo.

Spalding's Catchfly (*Silene spaldingii*)

Spalding's catchfly are found in remnant Palouse prairie and channeled scablands sites in southern British Columbia, eastern Washington, northeastern Oregon, west-central Idaho, and western Montana (Niggeman and Fertig 2018). Spalding's catchfly populations have been observed in the following Washington counties: Asotin, Garfield, Spokane, Whitman, Lincoln, and Adams (Fertig 2018).

Proposed development does not occur in any Washington county where Spalding's catchfly has been observed, and the alternative route will not prevent future establishment of any plant. Spalding's catchfly is not likely to occur within the PA.

Due to their absence from the PA, this project will have No Effect on Spalding's Catchfly.

Monarch Butterfly (*Danaus plexippus*)

Monarch butterflies are the only butterfly species with a bi-directional migration pattern (USFS 2025). There are two different migrating populations in North America. The larger eastern population, which breeds east of the Rocky Mountains and migrates to eastern Mexico to overwinter, is not present in the PA. The smaller western population, which breeds west of the Rocky Mountains and overwinters in wooded groves along the California coast, could be present in the PA.

Monarch butterflies are inextricably linked to milkweed (*Asclepias* spp.). Milkweed provides habitat for laying eggs, a food source for caterpillars and migrating adults, and a defense mechanism (toxicity) that deters predators (USFWS 2025a).

Monarch butterfly presence in the Project Area is limited by patchy and low-density milkweed distribution (Stevens and Frey 2010). Based on research prepared for the Idaho Dept. of Fish and Game and WDFW, the nearest milkweed observation is 27 miles from the PA (Waterbury et al. 2019).

Due to the absence of milkweed, and therefore Monarch butterfly, in the PA, this project will have No Effect on Monarch butterfly.

Suckley's cuckoo bumble bee (*Bombus suckleyi*)

Suckley's cuckoo bumble bee enters and takes over the nests of red-belted bumble bee (*Bombus rufocinctus*), white-shouldered bumble bee (*Bombus appositus*) and western bumble bee (*Bombus occidentalis*) because the species is not equipped to construct their own nests (WDFW 2025b). For this reason, Suckley's cuckoo bumble bee populations are strongly correlated with the abundance of their host species.

Red-belted bumble bee populations represent more than four percent of all observations in the Pacific Northwest Bumble Bee Atlas. They are maintaining a stable or modestly growing population, and they are more commonly found in the following ecoregions, all of which are outside of the PA: North and Middle Rockies, Blue Mountains, Idaho Batholith, and Basin and Range (BBA 2025a).

White-shouldered bumble bee populations represent less than three percent of all observations in the Pacific Northwest Bumble Bee Atlas. They are maintaining a stable population, and they are more commonly found in higher elevation forests and meadows in the following ecoregions, all of which are outside the PA: Blue Mountains, Idaho Batholith, Northern Rockies, and Willamette Valley (BBA 2025b).

Western bumble bee was historically the most common bumble bee in the Pacific Northwest, accounting for more than 15 percent of all observations in the Pacific Northwest Bumble Bee Atlas (BBA 2025c). The population has declined by more than 90 percent since the year 2000 (OSU 2020). Western bumble bee is most commonly found in the following ecoregions, all of which are outside the PA: Cascades, Idaho Batholith, and Northern Rockies.

Suckley's cuckoo bumble bees historically occurred throughout Canada and the United States, including in Washington state (WDFW 2025b). Based on range-wide survey efforts conducted as part of the Pacific Northwest Bumble Bee Atlas in Oregon, Washington, and Idaho, Suckley's cuckoo bumble bee was not observed in any of over 39,000 bee specimens that were collected and identified to species in 2018-2019 (CBD 2020).

The project will result in temporary vegetation removal in an ecoregion that is not commonly associated with but may be associated with Suckley's bumble bee and its host species. Vegetation removal may include species that provide forage for host species. Since host species are generalists, meaning they aren't interested in one or few species of flowering plants in particular, the temporary removal of vegetation that could provide pollen is not expected to significantly disrupt host species behavior or abundance.

Due to low (or zero) abundance in the PA, and the short duration/low intensity of project impacts (one to several growing seasons to re-establish shrub-steppe species), this project will have No Effect on Suckley's cuckoo bumble bee.

3.5.11 Critical Habitat and Threatened/Endangered Species Habitat - Background

Based on the IPaC Official Species List generated for this project, Critical Habitat is absent from the PA.

3.5.12 Critical Habitat and Threatened/Endangered Species Habitat - Impacts

No impacts to designated Critical Habitat are expected due to their absence from the PA.

3.5.13 Biological Resources – No Action Alternative

The NAA would not result in any changes to wildlife including migratory birds, vegetation, threatened/endangered species, or their designated Critical Habitat. No significant direct, indirect, short-term, long-term, or cumulative impacts would be anticipated.

3.6 HISTORIC AND CULTURAL RESOURCES

3.6.1 Introduction

In accordance with NEPA and National Historic Preservation Act (NHPA) requirements, WestLand Resources has evaluated the proposed fiber alignment for potential effects on cultural resources, including properties listed on or eligible for listing on the National Register of Historic Places (NRHP). Their work is focused on all areas within 100 feet of proposed development. Land area within 100 feet of ground-disturbing activities is collectively referred to as the Area of Potential Effects (APE).

3.6.2 Sacred Sites - Background

EO 13007, dated May 24, 1996, instructs the Department of the Interior to accommodate access and protect the physical integrity of American Indian sacred sites. A sacred site is defined in the EO as any specific, discrete, narrowly delineated location on federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site.

3.6.3 Sacred Sites - Impacts

The PA is within the traditional territory of the Nespelem and Sanpoil. Locations with traditional Indian place names and traditional cultural value are present in the vicinity of the project area, but no Traditional Cultural Properties are known.

No impacts to sacred sites are expected.

3.6.4 Cultural Resources Findings - Background

WestLand Resources conducted pedestrian and subsurface field survey, revisited one previously recorded historic railroad property, and identified one historic debris scatter/concentration dating between the 1880s and 1960s. WestLand recommends that the eligibility status of the historic railroad property remain as “potentially eligible for listing” in the NRHP. WestLand concludes that the historic debris scatter/concentration is not eligible for listing in the NRHP.

3.6.5 Cultural Resources Findings - Impacts

To avoid impacts to the historic railroad property, WestLand recommends aerial cable or boring where the project crosses the historic railroad property. Based on this recommendation, the revised site plan proposes directional boring to avoid impacts to the crossing.

The Washington Department of Archeology and Historic Preservation provided concurrence with the WestLand Resources finding of No Adverse Effects on Historic Properties on March 26, 2025. The CCT THPO provided concurrence with the No Adverse Effects on Historic Properties finding on April 10, 2025. The FCC Tower Construction Notification System (TCNS) was used to coordinate with any Tribes asserting ancestral ties to the PA. The Blackfeet Tribe’s March 14, 2025 No Interest response was the only communication received. Appendix C provides the history of Tribal consultation for this project.

No impacts to cultural resources are expected.

3.6.6 Indian Trust Assets - Background

Indian Trust Assets (ITAs) are legal interests in property held in trust by the United States for indigenous tribes or individual Indian Trust landowners. ITAs may include land, minerals, federally reserved hunting and fishing rights, federally reserved water rights, and instream flows associated with trust land. The General Allotment Act of 1887 allotted land to some tribes, while others were allotted land through treaty or specific legislation until 1934, when further allotments were prohibited. These allotments are considered ITAs. An ITA has three components: (1) the trustee, (2) the beneficiary, and (3) the trust asset.

The United States has an Indian Trust responsibility to protect and maintain rights reserved by or granted to indigenous tribes or individuals by treaties, statutes, and EOs. This Trust responsibility requires that officials from Federal agencies, including Reclamation, take all actions reasonably necessary to protect ITAs when administering programs under their control.

As stated in the 1994 memorandum from President William J. Clinton titled “Government-to-Government Relations with Native American Tribal Governments,” federal agencies are responsible for the assessment of project effects on tribal trust resources and federally recognized

tribal governments. NTIA and Reclamation are tasked to actively engage and consult with federally recognized tribal governments on a government-to-government level when the agency's actions have the potential to affect ITAs. In addition, Reclamation must protect and preserve ITAs from loss, damage, unlawful alienation, waste, and depletion, as outlined in the Department of the Interior Manual Part 512, Chapter 2 Departmental Responsibilities for Indian Trust Resources.

Federally recognized tribes with trust land are beneficiaries of the Indian Trust relationship when the United States acts as trustee. No one can sell, lease, or otherwise encumber ITAs without approval of the U.S. Government. As a cooperating agency for the proposed project, Reclamation has a responsibility to comply with all applicable laws, regulations, and guidance for the agency's actions in the project and evaluate the effects on resources and activities over which Reclamation has special expertise. This includes researching the existence of and impacts to any ITAs in the Reclamation-owned portion of the project and engaging in government-to-government consultation as requested.

The affected environment for ITAs includes all lands administered by Reclamation within the PA. The CCT is the closest potentially affected federally recognized tribe and is also a project proponent. ITAs can occur outside of reservation boundaries. Consequently, the Spokane Tribe of Indians have a historical presence and cultural interest in the alternative route as well.

3.6.7 Indian Trust Assets - Impacts

No Indian Trust lands were identified on lands administered by Reclamation in the PA during the scoping process, such as those held in trust by the BIA for the benefit of tribes or individual Indian Trust landowners. As part of the scoping process, Reclamation researched Tessel, a Federal Geographic Information System land database that includes federal lands held in trust for tribes and individual Indian Trust landowners. This research indicated that there are no known ITAs in the PA.

No impacts to ITAs are expected.

3.6.8 Historic and Cultural Resources – No Action Alternative

The NAA would not result in any significant direct, indirect, short-term, long-term, or cumulative impacts to sacred sites, cultural resources, or ITAs.

3.7 AESTHETIC AND VISUAL RESOURCES

3.7.1 Population and Demographics - Background

The alternative route is located between the town of Coulee Dam and the city of Grand Coulee. Coulee dam is an incorporated area that spans Okanogan County and Douglas County. Grand Coulee is an incorporated area in Grant County. They each have total populations of approximately 1,000 based on the 2020 Decennial Census. The following represents a demographic summary of the PA.

Table 8 Demographic Summary of the PA

Demographic Type		Grand Coulee	Coulee Dam
Median Age		48.2	42
Race	Hispanic or Latino	76	59
	Not Hispanic or Latino	896	1,152
Median Household Income (ACS 2023 5-Year)		\$42,083	\$67,868
Bachelor's Degree or Higher Education (ACS 2023 5-Year)		15.8%	31.9%

Data Source: 2020 Decennial Census Unless Otherwise Noted

3.7.2 Population and Demographics - Impacts

The project will not alter the population or demographic makeup of the area. No impacts to population or demographics are expected.

3.7.3 Natural Features and Visual Resources - Background

The alternative route occurs in close proximity to the Columbia River. Based on review of WDFW Priority Habitats and Species Maps, no other notable natural features are known to exist in the PA.

3.7.4 Natural Features and Visual Resources - Impacts

Installation of four above-ground poles will modify the visual landscape. However, the poles appear in the shadow of a large high-voltage transmission corridor. Overall, the small number of poles, their relatively low height above grade, and the presence of significantly more visually distracting structures in the immediate vicinity supports the assertion that the alternative route will not diminish natural features/visual resources.

No impacts to natural features are expected.

3.7.5 Recreation - Background

The alternative route occurs on lands administered by Reclamation and in the ROW of SR174. No recreation opportunities exist in the PA.

3.7.6 Recreation - Impacts

No impacts to recreation are expected due to their absence from the PA and because the project does not create new recreational opportunities.

3.7.7 Aesthetic and Visual Resources – No Action Alternative

The NAA would not result in any significant direct, indirect, short-term, long-term, or cumulative impacts to aesthetic or visual resources.

3.8 LAND USE

3.8.1 State Jurisdiction - Background

0.25 miles of the buried portion of the alternative route is within WSDOT ROW along SR174. For this reason, the alternative route requires a franchise agreement between WSDOT and the

applicant. State approval includes internal environmental review, which will be processed by WSDOT as a Categorical Exclusion for this modification.

3.8.2 State Jurisdiction - Impacts

No impacts to state jurisdiction are expected to result from the issuance of a franchise agreement.

3.8.3 Federal Jurisdiction - Background

1.13 miles of buried fiber and 875 feet of aerial fiber are located on lands that are managed by Reclamation. See Figure 2 above. The project creates a federal nexus with Reclamation due to proposed development on lands administered by Reclamation. Reclamation accepted cooperating agency status for the initial NEPA review, which extends to the proposed re-alignment. Reclamation will consider the issuance of use authorizations for all work on lands managed by Reclamation, and no construction shall occur on said lands until written authorization has been given.

3.8.4 Federal Jurisdiction - Impacts

No impacts to federal jurisdiction are expected.

3.8.5 Land Use – No Action Alternative

The NAA would not result in any significant direct, indirect, short-term, long-term, or cumulative land use impacts.

3.9 INFRASTRUCTURE

3.9.1 Utilities - Background

Grand Coulee and Coulee Dam are served with electricity and telephone from a network of utility providers. Curbside solid waste services are provided by the municipality, and broadband internet is available in some areas. Municipal water and sewer are provided by the municipality.

3.9.2 Utilities - Impacts

No tie-ins to any existing utilities are proposed. No impacts to utilities are expected.

3.9.3 Telecommunications - Background

Existing telecommunications facilities provide AM/FM radio, television stations, cellular service, and wireless broadband internet.

3.9.4 Telecommunications - Impacts

Tie-ins to existing utilities are limited to the proposed connection at the NoaNet Comm Hut site. No impacts to telecommunications are expected in the PA.

3.9.5 Transportation Accessibility - Background

Work occurring between SR174 and Lincoln Ave is inaccessible to unauthorized vehicles because it is managed by Reclamation for access/maintenance to the existing transmission corridor. WSDOT is responsible for managing SR174 within their ROW and within easements on federal property. See Figures 3-6 above.

3.9.6 Transportation Accessibility - Impacts

The alternative route requires a franchise agreement with WSDOT that includes a temporary traffic control plan. The plan is designed in accordance with the Manual of Uniform Traffic Control Design and WSDOT standards, which ensures that temporary traffic impacts will be minimal. Specifically, the plan includes traffic control devices and flagging personnel, with all construction to be conducted during daylight hours. No long-term impacts are anticipated.

No impacts to transportation accessibility are expected.

3.9.7 Infrastructure – No Action Alternative

The NAA would not result in any significant direct short-term, long-term, or cumulative infrastructure impacts. Indirect negative impacts to infrastructure and the community it supports would result from continued lack of access to reliable high-speed broadband internet access.

3.10 SOCIOECONOMIC RESOURCES

3.10.1 Socioeconomic Resources – Background

EO 12898 (Federal Register 1994) requires federal agencies to consider race, national origin, and income to determine whether programs, policies, and activities have disproportionately high human health or environmental effects. Although this Supplement is intended to address a minor design change near the town of Coulee Dam and the city of Grand Coulee, the project will benefit residents and businesses on CCT land in Ferry County and Okanogan County. For this reason, this section focuses on socioeconomic trends on CCT land.

Based on research prepared by the CEQ (CEQ 2024), the Colville Reservation is a socioeconomically disadvantaged community based on environmental factors (e.g. building and population loss due to natural hazards), health outcomes (above the 90th percentile for asthma, diabetes, and heart disease), and workforce development (e.g. above the 90th percentile for low median income and unemployment, and above ten percent for high school education completion).

3.10.2 Socioeconomic Resources – Impacts

No negative impacts to socioeconomic resources were identified. This project will significantly increase access to fast, reliable broadband internet speeds throughout the Colville Reservation; survey responses from the Ferry County Broadband Action Team indicate that average speeds in 2019 were ~10Mbps download/~2Mbps upload, which is far short of the Federal Communications Commission (FCC) 25/3 benchmark (Magellan 2020). Increased access will create a pathway to increased workforce development.

Positive impacts to socioeconomic resources are expected.

3.10.3 Socioeconomic Resources – No Action Alternative

The NAA would maintain socioeconomic conditions on CCT land; the absence of reliable broadband internet would continue. The NAA would prevent the community from realizing the positive aspects described above.

3.11 HUMAN HEALTH AND SAFETY

3.11.1 Hazardous Sites - Background

No hazardous materials will be used on site during construction. To determine the presence of nearby hazardous waste that may be affected by construction, an in-office review of Washington State Department of Ecology and EPA databases that track hazardous waste was performed. Sources include the Ecology *What's in My Neighborhood* map tool and the *Cleanup and Tank Search* tool. EPA research included the *Underground Storage Tank Finder* map tool and the *Cleanups in My Community* map tool. For the purpose of this assessment, hazardous waste sites include leaking underground storage tanks with open status (i.e. active releases only), Brownfields properties, Superfund sites, and Washington State Department of Ecology toxic substance cleanup sites (i.e. petroleum, heavy metals, chemicals, pesticides, and persistent organic pollutants). No hazardous waste sites were identified in the PA.

3.11.2 Hazardous Sites - Impacts

No impacts related to hazardous waste are expected due to their absence from the PA.

3.11.3 Public Safety Facilities - Background

For the purpose of this assessment, public safety refers to police, fire, and EMS services. Police services are provided by the city of Grand Coulee and the town of Coulee Dam. Fire and EMS services are provided by a volunteer fire department for Grand Coulee and the Coulee Dam Fire Department for Coulee Dam.

3.11.4 Public Safety Facilities - Impacts

No negative impacts to public safety facilities are expected. Increased broadband connectivity will improve communications and data sharing between public safety agencies. Installation of the COW site will improve public safety communications during emergencies.

This project provides a positive impact to public safety facilities.

3.11.5 Human Health and Safety – No Action Alternative

Maintaining current levels of service for internet would limit access to telehealth services and emergency services (e.g. fire, emergency medical services) response times. The NAA represents a negative impact to human health and safety on CCT land.

3.12 CUMULATIVE IMPACTS

Cumulative impacts include the total effect on natural resources, ecosystems, or human communities due to past, present, and future activities in the PA. The primary feature in the landscape is the Grand Coulee Dam, which provides 21 billion kWh of electricity to Washington, Oregon, California, and several western states, and irrigation water to approximately 720,000 acres of land (USACE 2025).

Major development in the PA includes overhead high-voltage transmission wires and their support structures, buried electrical feeders that provide electricity to the town of Coulee Dam, and a network of maintenance/access roads. Future development in the PA includes replacement of three buried electrical feeders. Relative to the greater overall fiber deployment project, the alternative route is a minor modification.

The alternative route is less consequential to natural resources, ecosystems, or human communities than ongoing human uses in the area by orders of magnitude. For this reason, no significant cumulative impacts are anticipated to occur.

4.0 ENVIRONMENTAL PERMITS AND CONSULTATIONS

Table 9 below provides a summary of environmental permits required and/or possible coordination for the proposed project. The applicant intends to apply for any additional local permits that are identified and will not commence construction until receiving approval from all agencies with authority. Table 10 below provides a summary of consultations related to the alternative route.

Table 9 Environmental Permits and Regulatory Requirements Summary

Regulatory Agency	Authority to Regulate	Regulated Activity
Federal		
Bureau of Reclamation	Ownership/ROW Use Authorization	All development on land managed by Reclamation
Dept. of Archaeology and Historic Preservation	Section 106 of the National Historic Preservation Act	All development activities receiving federal funds
US Army Corps of Engineers	Section 404 of the Clean Water Act	*Discharge of Dredge and fill into Waters of the United States (no impacts proposed)
	Section 10 of the Rivers and Harbors Act	**All development activities in Navigable Waters (no impacts proposed)
National Marine Fisheries Service	Section 7 of the Endangered Species Act	All development activities receiving federal funds (No Effect Determination for Species and Critical Habitat)
US Fish and Wildlife Service	Section 7 of the Endangered Species Act	All development activities receiving federal funds (No Effect Determination for Species and Critical Habitat)
	Migratory Bird Treaty Act	***All development activities that affect migratory birds (no impacts proposed)
	Bald and Golden Eagle Protection Act	***All development activities that affect bald and golden eagles (no impacts proposed)
State		
WA State Dept. of Transportation	Ownership/Right-of-Way Use, Franchise Agreement	All construction in WSDOT right-of-way
Tribal		
Colville Confederated Tribes	Section 106 NHPA	All development activities receiving federal funds

* No discharge of dredge or fill into Waters of the United States is proposed

** No modifications to Navigable Waters are proposed

*** No impacts to protected migratory birds/raptors are anticipated

4.1 CONSULTATION STATUS

Table 10 below provides a summary of consultation related to cultural resources for the alternative route. Agency documentation supporting each consultation line item in Table 10 below is provided as Appendix C.

Table 10 Consultation Summary

Regulatory Agency	Consultation/ Finding	Name and Title of Reviewer	Consultation Status
Federal			
Tower Construction Notification System	Notification Letter	Josh Fitzpatrick, NTIA Environmental Program Officer	Tribal coordination complete as of 3/31/25
Tower Construction Notification System	Blackfeet Tribe/ No interest	Gheri Hall, Blackfeet Deputy THPO	No Interest Response submitted 3/14/25
Reclamation	Meeting: Survey Methodology, Permit Application	Sean C. Hess, PhD Supervisory Regional Archaeologist, Columbia-Pacific Northwest Region	Permit #GCPO U25-004:25.001 - Issued 12/11/24
State			
WA Dept. of Archaeology and Historic Preservation	Section 106 NHPA/ No Adverse Effect	Dr. Rob Whitlam, State Archaeologist	Concurrence with No Adverse Effect Finding. Complete as of 3/26/25.
Tribal			
CCT	Meeting: Survey Methodology	Guy Moura, Tribal Historic Preservation Officer	Meeting Date: 12/11/24 No Concerns Expressed
CCT	Section 106 NHPA No Adverse Effect	Guy Moura, Tribal Historic Preservation Officer	Concurrence with No Adverse Effects to Historic Properties Determination. Complete as of 4/10/25.

5.0 LIMITATIONS

This Supplemental Environmental Assessment summarizes the research, evaluation, and consultation needed to evaluate the effects of broadband fiber deployment on specific resources (e.g., natural, historic, cultural resources). WRI prepared this document using project information (e.g., KML files, site plans, written descriptions, etc.) provided by the applicant or an authorized representative. If the design or location of the installation changes, please contact WRI as additional review and/or consultation may be required.

WRI is an independent contractor and is not an employee of either the property owner(s) or the project proponent. Compensation is not based on the findings or recommendations made in this Supplement.

6.0 SIGNATORIES

The following WRI staff contributed to the research, consultation, and/or preparation of one or more component of this Supplemental EA.

A blue ink signature of Scott Brainard, consisting of a stylized 'S' followed by 'B' and a long horizontal flourish.

Scott Brainard
Principal, Project Manager

A blue ink signature of Niels Pedersen, featuring a cursive 'N' and 'P' with a long horizontal flourish.

Niels Pedersen
Primary Report Author

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Appendix A

US Fish and Wildlife Service
IPaC Official Species List



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish And Wildlife Office

510 Desmond Drive Se, Suite 102

Lacey, WA 98503-1263

Phone: (360) 753-9440 Fax: (360) 753-9405



In Reply Refer To:

04/01/2025 18:54:12 UTC

Project Code: 2025-0047195

Project Name: Colville Confederated Tribes NTIA 2.5GHz Grand Coulee Re-Alignment

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf>

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see <https://www.fws.gov/program/migratory-bird-permit/what-we-do>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see <https://www.fws.gov/library/collections/threats-birds>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/partner/council-conservation-migratory-birds>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Washington Fish And Wildlife Office
510 Desmond Drive Se, Suite 102
Lacey, WA 98503-1263
(360) 753-9440

PROJECT SUMMARY

Project Code: 2025-0047195

Project Name: Colville Confederated Tribes NTIA 2.5GHz Grand Coulee Re-Alignment

Project Type: New Constr - Below Ground

Project Description: Re-align previously approved fiber project in vicinity of Grand Coulee.

Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@47.9569603,-119.00136712870633,14z>



Counties: Douglas and Grant counties, Washington

ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME	STATUS
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

FISHES

NAME	STATUS
Bull Trout <i>Salvelinus confluentus</i> Population: U.S.A., coterminous, lower 48 states There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8212	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885	Proposed Endangered

FLOWERING PLANTS

NAME	STATUS
Spalding's Catchfly <i>Silene spaldingii</i> There is proposed critical habitat for this species. Species profile: https://ecos.fws.gov/ecp/species/3681	Threatened

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Niels Pedersen
Address: 9505 19th Ave SE
Address Line 2: Suite 106
City: Everett
State: WA
Zip: 98208
Email: niels@wetlandresources.com
Phone: 4253373174

LEAD AGENCY CONTACT INFORMATION

Lead Agency: National Telecommunications and Information Administration

You have indicated that your project falls under or receives funding through the following special project authorities:

- BIPARTISAN INFRASTRUCTURE LAW (BIL) (OTHER)

Appendix B

Site Plan

VAULT NAME: TBD
TYPE: 17" x 30"
STORAGE: 150' 144F
EQUIPMENT: NONE

SW 1/4 S36 T29N R30E

NW 1/4 S1 T28N R30E

- 1 SET (1) NEW 30"X48" VAULT
- 2 SET (1) NEW 17"x30" VAULT
- 3 TRENCH (2) 1-1/2" CONDUITS & PULL FIBER THROUGH.
- 4 PLOW (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
- 5 BORE (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
- 6 SET UP TEMPORARY BORE PIT
- 7 INSTALL (1) NEW SPLICE CASE.
- 8 INSTALL (1) NEW DOWN GUY & ANCHOR
- 9 INSTALL (1) 2" RISER & STANDOFF BRACKETS ON POLE
- 10 INSTALL 40/3 DUCTILE IRON POLE

- 1R RESTORE PER BUREAU OF RECLAMATION SPECIFICATIONS
- 2R RESTORE PER WSDOT SPECIFICATIONS

WHEN PARALLEL TO GAS UTILITIES PROPOSED CONDUIT MUST MAINTAIN A MINIMUM OF 3' HORIZONTAL CLEARANCE. WHEN PARALLEL TO ALL OTHER UTILITIES PROPOSED CONDUIT MUST MAINTAIN A MINIMUM OF 5' HORIZONTAL CLEARANCE.

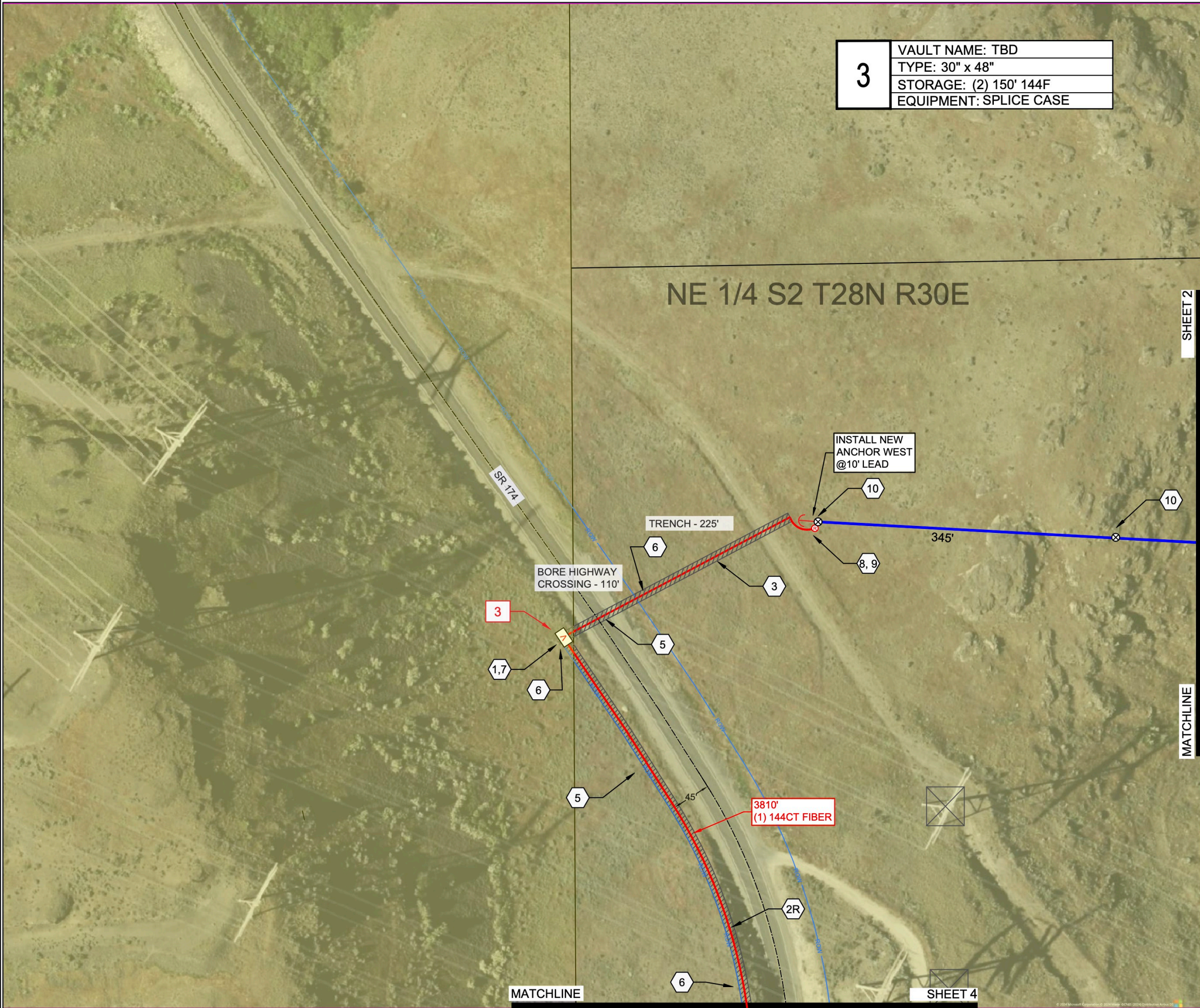
[illegible]

RAWN BY: CS

SCALE:

Direction	Segment	Color	Value
Left (Negative)	Inner	Black	-1
	Outer	White	-2
Right (Positive)	Inner	White	1
	Outer	Black	2

2 / 6



3	VAULT NAME: TBD
	TYPE: 30" x 48"
	STORAGE: (2) 150' 144F
	EQUIPMENT: SPLICE CASE

SHEET 2

MATCHLINE

CONSTRUCTION NOTES:

- 1

SET (1) NEW 30"x48" VAULT
- 2

SET (1) NEW 17"x30" VAULT
- 3

TRENCH (2) 1-1/2" CONDUITS & PULL FIBER THROUGH.
- 4

PLOW (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
- 5

BORE (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
- 6

SET UP TEMPORARY BORE PIT
- 7

INSTALL (1) NEW SPLICE CASE.
- 8

INSTALL (1) NEW DOWN GUY & ANCHOR
- 9

INSTALL (1) 2" RISER & STANDOFF BRACKETS ON POLE
- 10

INSTALL 40/3 DUCTILE IRON POLE

BUREAU OF RECLAMATION PROPERTY BOUNDARY

RESTORATION NOTES:

- 1R

RESTORE PER BUREAU OF RECLAMATION SPECIFICATIONS
- 2R

RESTORE PER WSDOT SPECIFICATIONS

LOCATION	POTHOLE DISCLAIMER
	POTHOLING WILL BE PERFORMED IN SOFT SURFACES WHEN APPLICABLE TO REDUCE HARD SURFACE RESTORATION. PATCH POTHOLE LOCATIONS PER LOCAL JURISDICTION SPECIFICATIONS

STATION START
STATIONING STARTS AT 10+00 THE INTERSECTION OF SW CHARLESTOWN ST & 49TH AVE SW

UTILITY LOCATION DISCLAIMER
ALL LOCATIONS OF UTILITY SHOWN ARE APPROXIMATE. LOCATIONS OF ALL UTILITIES TO BE VERIFIED PRIOR TO CONSTRUCTION. CALL UTILITY UNDERGROUND LOCATION CENTER AT 1-800-424-5555

- PROPOSED PATH DISCLAIMERS**
1.

PROPOSED PATHWAY MAY CHANGE AT TIME OF CONSTRUCTION DUE TO UTILITY LOCATIONS AND INSPECTOR REQUIREMENTS
2.

UNKNOWN UTILITY DEPTH TO BE VERIFIED IN FIELD DURING TIME OF CONSTRUCTION WHEN TRENCHING

DRAINAGE SYSTEM DISCLAIMER
EXISTING DRAINAGE SYSTEM (GRATE INLET, DITCH, ETC.) SHALL BE PROTECTED AND FUNCTIONAL THROUGHOUT THE CONSTRUCTION PROJECT. IF ANY PARTS OF THE SYSTEM ARE IMPACTED BY CONSTRUCTION ACTIVITIES, THEY SHALL BE RESTORED TO THE ORIGINAL CONDITIONS.

UTILITY NOTE
WHEN CROSSING EXISTING SEWER, STORM MAIN, WATER, AND GAS UTILITIES, PROPOSED CONDUIT MUST MAINTAIN A MINIMUM OF 12" ABOVE AND 18" BELOW VERTICAL CLEARANCE (MEASURED FROM OUTSIDE EDGE OUTSIDE EDGE

WHEN PARALLEL TO GAS UTILITIES PROPOSED CONDUIT MUST MAINTAIN A MINIMUM OF 3' HORIZONTAL CLEARANCE. WHEN PARALLEL TO ALL OTHER UTILITIES PROPOSED CONDUIT MUST MAINTAIN A MINIMUM OF 5' HORIZONTAL CLEARANCE.

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24-079

Noanet CCT FTTH

HWY 174

GRAND COULEE, WA

WEST- GC REROUTE

REV	DATE	DESCRIPTION OF CHANGE	BY	QC

CODE: 24-079

SUBMITTAL DATE: 10/9/2024

PROJECT MANAGER: ALC

FILED BY:

DRAWN BY: CS

SCALE:

CONSTRUCTION PLAN

3 / 6



CONSTRUCTION NOTES:

- 1 SET (1) NEW 30"x48" VAULT
- 2 SET (1) NEW 17"x30" VAULT
- 3 TRENCH (2) 1-1/2" CONDUITS & PULL FIBER THROUGH.
- 4 PLOW (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
- 5 BORE (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
- 6 SET UP TEMPORARY BORE PIT
- 7 INSTALL (1) NEW SPLICE CASE.
- 8 INSTALL (1) NEW DOWN GUY & ANCHOR
- 9 INSTALL (1) 2" RISER & STANDOFF BRACKETS ON POLE

BUREAU OF RECLAMATION PROPERTY BOUNDARY

RESTORATION NOTES:

- 1R RESTORE PER BUREAU OF RECLAMATION SPECIFICATIONS
- 2R RESTORE PER WSDOT SPECIFICATIONS

LOCATION



POTHOLE DISCLAIMER
POTHOLES WILL BE PERFORMED IN SOFT SURFACES WHEN APPLICABLE TO REDUCE HARD SURFACE RESTORATION. PATCH POTHOLES LOCATIONS PER LOCAL JURISDICTION SPECIFICATIONS

STATION START

STATIONING STARTS AT 10+00 THE INTERSECTION OF SW CHARLESTOWN ST & 49TH AVE SW

UTILITY LOCATION DISCLAIMER

ALL LOCATIONS OF UTILITY SHOWN ARE APPROXIMATE. LOCATIONS OF ALL UTILITIES TO BE VERIFIED PRIOR TO CONSTRUCTION. CALL UTILITY UNDERGROUND LOCATION CENTER AT 1-800-424-5555

PROPOSED PATH DISCLAIMERS

- 1. PROPOSED PATHWAY MAY CHANGE AT TIME OF CONSTRUCTION DUE TO UTILITY LOCATIONS AND INSPECTOR REQUIREMENTS
- 2. UNKNOWN UTILITY DEPTH TO BE VERIFIED IN FIELD DURING TIME OF CONSTRUCTION WHEN TRENCHING

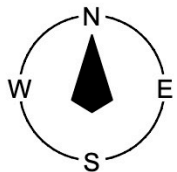
DRAINAGE SYSTEM DISCLAIMER

EXISTING DRAINAGE SYSTEM (GRATE INLET, DITCH, ETC.) SHALL BE PROTECTED AND FUNCTIONAL THROUGHOUT THE CONSTRUCTION PROJECT. IF ANY PARTS OF THE SYSTEM ARE IMPACTED BY CONSTRUCTION ACTIVITIES, THEY SHALL BE RESTORED TO THE ORIGINAL CONDITIONS.

UTILITY NOTE

WHEN CROSSING EXISTING SEWER, STORM MAIN, WATER, AND GAS UTILITIES, PROPOSED CONDUIT MUST MAINTAIN A MINIMUM OF 12" ABOVE AND 18" BELOW VERTICAL CLEARANCE (MEASURED FROM OUTSIDE EDGE OUTSIDE EDGE)

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24-079
NoaNet CCT FTTH
HWY 174
GRAND COULEE, WA
WEST- GC REROUTE

PROJECT REVISIONS		QC	BY	DATE
DESCRIPTION OF CHANGE				
REV	DATE			

CODE: 24-079
SUBMITTAL DATE: 10/9/2024
PROJECT MANAGER: ALC
FILED BY:

DRAWN BY: CS
SCALE: 1" = 100'
0 0 10

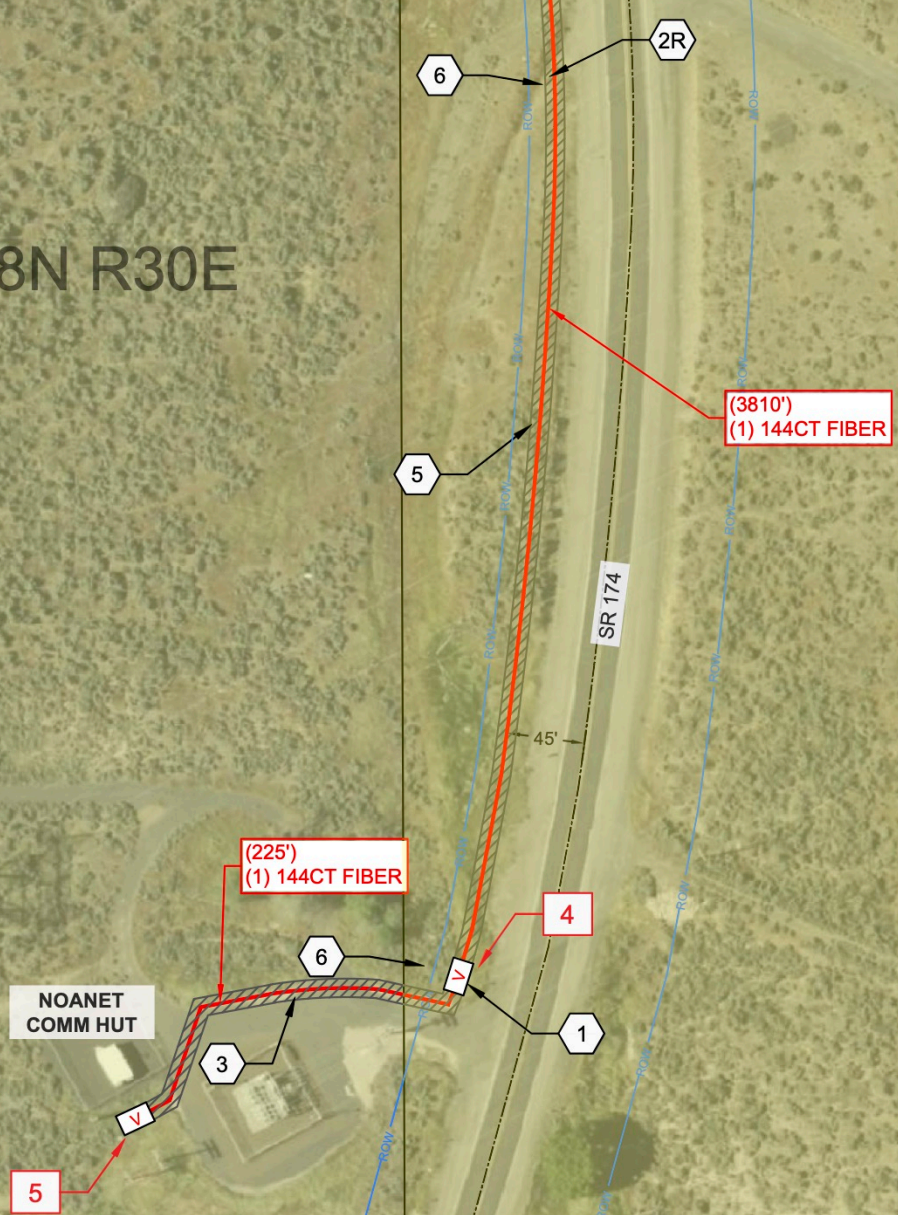
CONSTRUCTION PLAN

4 / 6

SHEET 5

5	VAULT NAME: NN NV1
	TYPE: EX 30" x 48"
	STORAGE: 150' 144F
	EQUIPMENT: NONE

SE 1/4 S2 T28N R30E



22714 SR 174

- 1 SET (1) NEW 30"X48" VAULT
- 2 SET (1) NEW 17"X30" VAULT
- 3 TRENCH (2) 1-1/2" CONDUITS & PULL FIBER THROUGH.
- 4 PLOW (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
- 5 BORE (2) 1-1/2" CONDUITS AND PULL FIBER THROUGH
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- 7 INSTALL (1) NEW SPLICE CASE.
- 8 INSTALL (1) NEW DOWN GUY & ANCHOR
- 9 INSTALL (1) 2" RISER & STANDOFF BRACKETS ON POLE

1R	RESTORE PER BUREAU OF RECLAMATION SPECIFICATIONS
2R	RESTORE PER WSDOT SPECIFICATIONS

<u>LOCATION</u>	<u>POTHOLE DISCLAIMER</u>
	POTHOLING WILL BE PERFORMED IN SOFT SURFACES WHEN APPLICABLE TO REDUCE HARD SURFACE RESTORATION. PATCH POTHOLE LOCATIONS PER LOCAL JURISDICTION SPECIFICATIONS

STATION START
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UTILITY LOCATION DISCLAIMER
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LOCATIONS OF ALL UTILITIES TO BE VERIFIED PRIOR TO
CONSTRUCTION. CALL UTILITY UNDERGROUND LOCATION
CENTER AT 1-800-424-5555

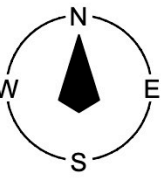
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HWY 174
GRAND COULEE, WA

WEST- GC REROUTE

[illegible]

CODE: 24-079

SUBMITTAL DATE: 10/9/2024

PROJECT MANAGER: ALC

FIELD BY: _____

RAWN BY: CS

SCALE:

--	--

Age Group	Percentage
18-24	15%
25-34	25%
35-44	20%
45-54	15%
55-64	10%
65-74	5%
75-84	5%
85+	5%

0 0 0

CONSTRUCTION PLAN

—

6 / 6

0 / 0

Appendix C

Consultation Status



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

**NOTICE OF ORGANIZATION(S) WHICH WERE SENT PROPOSED
BROADBAND PROJECT NOTIFICATION INFORMATION**

Date: 02/14/2025

COLVILLE CONFEDERATED TRIBES
TIFFANY CIRCLE
1401 CONSTITUTION AVE.
WASHINGTON, DC 20230

Dear Applicant:

The National Telecommunications and Information Administration (NTIA) is using a modified version of the Federal Communications Commission's (FCC) Tower Construction Notification System (TCNS) as a means of expediting its Broadband grant programs. This notice is to inform you that the following authorized parties were sent information about the application that you submitted to NTIA through TCNS. The information was forwarded to authorized TCNS users by electronic mail and/or regular mail (letter).

Persons who have received the notification that you provided include leaders or their designees of federally-recognized American Indian Tribes, including Alaska Native Villages (collectively "Tribal Nations"), Native Hawaiian Organizations (NHOs), and State Historic Preservation Officers (SHPOs) who have set their geographic preferences on TCNS. For your convenience in identifying the referenced Tribal Nations and NHOs and in making further contacts, the City and State of the Seat of Government for each Tribal Nation and NHO, as well as the designated contact person, is included in the listing below. We note that Tribal Nations may have Section 106 cultural interests in ancestral homelands or other locations that are far removed from their current Seat of Government. Consistent with the FCC's rules as set forth in the NPA, NTIA requires that all Tribal Nations and NHOs listed below are afforded a reasonable opportunity to respond to this notification, consistent with the procedures set forth below.

We note that the review period for all parties begins upon receipt of a full project submittal and notifications that do not provide this serve as information only. If, upon receipt, the Tribal Nation or NHO does not respond within a reasonable time, you should make a reasonable effort at follow-up contact, unless the Tribal Nation or NHO has agreed to different procedures. In the event a Tribal Nation or NHO does not respond to a follow-up inquiry, or if a substantive or procedural disagreement arises between you and a Tribal Nation or NHO, you must seek guidance from NTIA. NTIA will follow procedures consistent with those set forth in the FCC's Second Report and Order released on March 30, 2018 (FCC 18-30).

1. Deputy THPO - gheri hall - Blackfeet tribal Historic Preservation Office - 46 Gentle Street (PO Box: 850) - browning, MT - g.hall@blackfeetnation.com; g.hall@blackfeetnation.com - 406-338-7521 (ext: 2355) - electronic mail

2. THPO - Josh Mann - Eastern Shoshone Tribe - (PO Box: 538) - Fort Washakie, WY - jmann@easternshoshone.org; sdurgin@easternshoshone.org - 307-335-2081 - electronic mail

Details: Thank you for the recent submittal regarding your TCNS project. Based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC Programmatic Agreement as Traditionally Associated Peoples (TAPs) and a sovereign nation legal responsibility for heritage preservation on ancestral homelands. Please

utilize our ESTHPO website for online submittals. Our website address is: <http://www.esthpo.com>. Please navigate to our Services page. On the services page there will be a Submittal button under the Section 106 Consultation literature. The submittal button will navigate you to the upload page where can submit relevant project files for our consultation review.

Your submission should include:
Appropriate SHPO determination or response letter
Cultural Resource Report and or Archaeological Survey Report
Photographic project site documentation
Topographic or Quadrangle Maps
Site Plans/Construction Drawings
FCC Forms 620 and 621
Lat/Long Coordinates for the proposed project.
Project Coordinator Contact Information

Our 30-day review period will commence once all project details have been submitted into our online database. If you have any questions, please feel free to contact the Eastern Shoshone THPO: Joshua Mann, jmann@easternshoshone.org or by phone at: (307) 335-2081 or Shaylynn Durgin, sdurgin@easternshoshone.org or by phone at: (307) 335-2081. Thank you for consulting with the Eastern Shoshone Tribe.

The ancestors of the Eastern Shoshone Tribe lived a long and storied history across several states on their westward journey from the Western area to present-day Wyoming. This journey, confirmed by tribal oral history, ethnographies, and archaeological evidence, took place over multiple generations and through the present-day states of North Dakota, South Dakota, Nebraska, Kansas, Colorado, Wyoming, Montana, Idaho, Washington, Oregon, California, Utah, Nevada, Arizona, New Mexico and Texas. Significant historical resources throughout this region include major sacred sites including burial sites, occupation areas, medicinal plant and resource collection areas, and other significant traditional cultural properties (TCPs). Therefore, based on the location of your proposed project, the Eastern Shoshone Tribe does have an interest in this proposed project and are requesting to be consulted on this proposed project as required by the mandates expressed in 36 CFR 800, EO 13175, and the FCC National Programmatic Agreement as traditionally associated peoples (TAPs) and a sovereign nation with legal responsibility for heritage preservation on ancestral homelands.

3. Cultural Policy Representative - Scott Schuyler - Upper Skagit Indian Tribe - 25944 Community Plaza Way - Sedro Woolley, WA - sschuyler@upperskagit.com - 360-854-7009 - electronic mail

4. THPO - Kate Valdez - Confederated Tribes and Bands of the Yakama Nation - 401 Fort Road (PO Box: 151) - Toppenish, WA - thpo@yakama.com; daniel_jager@yakama.com - 509-865-5121 - electronic mail

If the applicant/tower builder receives no response from the Confederated Tribes and Bands of the Yakama Nation within 30 days after notification through TCNS, the Confederated Tribes and Bands of the Yakama Nation has no interest in participating in pre-construction review for the proposed site. The Applicant/tower builder, however, must immediately notify the Confederated Tribes and Bands of the Yakama Nation in the event archaeological properties or human remains are discovered during construction, consistent with Section IX of the Nationwide Programmatic Agreement and applicable law.

5. THPO - Guy Moura - Confederated Tribes of the Colville Reservation - (PO Box: 150) - Nespelem, WA - connor.armi.hsy@colvilletribes.com - 509-634-2876 - electronic mail and regular mail

The information you provided was also forwarded to the additional Tribes and NHOs listed below. These Tribes and NHOs have NOT set their geographic preferences on TCNS, and therefore they are currently receiving tower notifications for the entire United States.

The information you provided was also forwarded to the following SHPOs in the state in which you propose to construct and neighboring states. The information was provided to these SHPOs as a courtesy for their information and planning.

6. SHPO - Allyson Brooks - Office of Archeology & Historic Preservation - (PO Box: 48343) - Olympia, WA - allyson.brooks@dahp.wa.gov - 360-586-3065 - electronic mail

7. Deputy SHPO - Greg Griffith - Office of Archeology & Historic Preservation - (PO Box: 48343) - Olympia, WA - Greg.Griffith@DAH.P.WA.GOV - - electronic mail

8. - Greg Griffith - Washington State Department of Archaeology and Historic Preservation - (PO Box: 48343) - Olympia, WA - greg.griffith@dahp.wa.gov - 360-586-3073 - electronic mail

TCNS automatically forwards all notifications to all Tribal Nations and SHPOs that have an expressed interest in the geographic area of a proposal. A particular Tribal Nation or SHPO may also set forth policies or procedures within its details box that exclude from review certain facilities (for example, a statement that it does not review collocations with no ground disturbance or that indicates that no response within 30 days indicates no interest in participating in pre-construction review).

Please be advised that the NTIA cannot guarantee that the contact(s) listed above opened and reviewed an electronic or regular mail notification. The following information relating to the proposed project was forwarded to the person(s) listed above.

Notification Received: 02/07/2025

Notification ID: 291219

Project Number: 114823

Applicant: Colville Confederated Tribes

Applicant Contact: Tiffany Circle

Project Type(s): Aerial Plant/Facilities, Buried Plant/Facilities

Region(s) affected (State, County): WASHINGTON, DOUGLAS WASHINGTON, GRANT

Address or Geographical Location Description: Bureau of Reclamation property and Grant and Douglas County property near Grand Coulee dam

If you have any questions or comments regarding the content of this notice, please contact NTIA at: TCNS@ntia.gov.



Tower Construction Notification

[FCC](#) > [WTB](#) > Tower Construction Notification

[FCC Site Map](#)

Logged In: ([Log Out](#))

Tower Construction Notification Notification Replies

▶ [Notifications Home](#) ▶ [Back to Notification](#)

There are 1 replies for Notification ID 291219:

Reply Information

Reply Posted:
March 14, 2025

We have no interest in this site. However, if the Applicant discovers archaeological remains or resources during construction, the Applicant should immediately stop construction and notify the appropriate Federal Agency and the Tribe.

From:
Deputy THPO gheri
hall,
Blackfeet tribal Historic
Preservation Office

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Federal Communications Commission
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Washington, DC 20554
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Phone: 1-877-480-3201
ASL Videophone: 1-844-432-2275
Fax: 1-866-418-0232
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3/26/25 9:04am PDT

From: Dimaggio, Gia C

Subject Line: RE: [EXTERNAL] RE: Colville Broadband Cultural Resources
Report and Section 106 Finding

Hello Josh,

Thank you again for getting us the revised report as well as your finding of effect letter. On behalf of Reclamation, we concur with your finding of No Adverse Effects to Historic Properties.

That being said, I want to make sure that during project implementation on Reclamation lands, all correspondence regarding post-review discoveries goes through myself and my supervisor Dr. Sean Hess. Since we do not have a designated Archaeologists at our Grand Coulee Power Office, we will be involved going forward.

I did have some concerns with the Inadvertent Discovery plan of Human Remains that was included in the report. It is Reclamation policy to first inform the Federal Law Enforcement Officer before contacting the county coroner. In no instance do we notify DAHP of discoveries of human remains on Reclamation Land. If the finding is not forensic, we will consult with the Colville THPO and have tribal archaeologists assess the find along with our own archaeologists. Please continue to coordinate with us and notify us when project activities commence so that we have someone available to address any finds that may occur. I appreciate your time and attention on this.

Cheers,
Gia



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

March 26, 2025

Josh Fitzpatrick
National Telecommunications
& Information Administration
Department of Commerce
Washington, DC 20230

RE: Colville Confederated Tribes 2.5GHz Wireless, Middle Mile and
Fiber to the Home Project
Log No: 2023-07-04569-COMM

Dear Josh Fitzpatrick:

Thank you for contacting our department. We have reviewed the information and professional cultural resources report you provided for the proposed reroute of the *Colville Confederated Tribes 2.5GHz Wireless, Middle Mile and Fiber to the Home Project* for segment of the route in Grant County, Washington.

We concur with your Determination of No Adverse Effect with the stipulation for an unanticipated find plan.

We would also request receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4).

Should archaeological or historic materials be encountered during project activities, work in the immediate vicinity must stop, the area secured, and the concerned tribe's cultural staff and cultural committee and this department notified.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rob Whitlam', followed by a horizontal line.

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 890-2615
email: rob.whitlam@dahp.wa.gov



From: Guy Moura <guy.moura@colvilletribes.com>
Sent: Thursday, April 10, 2025 9:14 AM
To: Fitzpatrick, Joshua <jfitzpatrick@ntia.gov>
Cc: Gia C Dimaggio <gdimaggio@usbr.gov>, Mike Way <mway@ntia.gov>, James M Bailey <jbailey@usbr.gov>, Jessica E Peters <jepeters@usbr.gov>, Amanda Hoke <amanda.hoke.hsy@colvilletribes.com>, Shawna M Castle <SCastle@usbr.gov>, Rebecca L Thompson <RThompson@usbr.gov>, Tiffany Circle <tiffany.circle.itd@colvilletribes.com>, Crystal Hottowe <chottowe@ntia.gov>, Steven Dampf <sdampf@westlandresources.com>, Niels Pedersen <Niels@WetlandResources.com>, Stephen Schulte <stephen.schulte@noanet.net>, Rob Whitlam <rob.whitlam@dahp.wa.gov>
Subject: Re: Colville Broadband Cultural Resources Report and Section 106 Finding for Supplemental Environmental Assessment
Text:
DAHP WISAARD # 2023-07-04569

Joshua,

As previously stated, we concur that actions occurring under the Colville Broadband Supplemental Environmental Assessment are an undertaking, we concur with the APE, and we concur with the level of effort to identify historic properties.

We concur with WestLand's recommendations that 45GR4341 is not eligible for listing in the NRHP.

We concur with their recommendations regarding Site 45GR2559. We concur with WestLand's recommendation that no further cultural resources work is needed for this project.

If project plans change to include areas not covered by this survey, then additional study may be required. WestLand recommends that all ground-disturbing activities in the APE be conducted under the Inadvertent Discovery Plan (IDP) provided in Appendix D. The IDP lays out procedures to follow if archaeological deposits or human skeletal remains are inadvertently discovered during construction.

Therefore, we concur with NTIA's finding of No Adverse Effect to Historic Properties for Colville Broadband Supplemental activities and for their commitment to monitor ground disturbing activities.

lim læmt, qeʔciéwýew, thank you

Guy Moura
Manager, History/Archaeology Program
Tribal Historic Preservation Officer
Confederated Tribes of the Colville Reservation
(509) 634-2695

Appendix D

Federal Agency Comments and Response Matrix

Appendix D Federal Agency Comments and Response Matrix (NTIA, BOR)
COLVILLE CONFEDERATED TRIBES NTIA 2.5GHZ WIRELESS, MIDDLE MILE AND FIBER TO THE HOME PROJECT – SUPPLEMENTAL EA
NTIA/Bureau of Reclamation Combined Comment Matrix – All Comments are Addressed in the Revision 3 Supplemental EA (5.30.25)

Page #	Section/Figure/ Table/Paragraph	Reviewer Name	Reviewer Comment	Proposed Change	Applicant’s Response
EA Comments Sent by Reclamation (Rebecca Thompson – RThompson@usbr.gov) on 5.29.25 @ 4:30PM PDT (Re: [EXTERNAL] RE: Colville Supplemental Environmental Assessment - Revision 2 5.7.25) Reclamation Comments - Sheet 1/2					
Appendix B	Maps	R. Thompson	Are the areas highlighted as “Reclamation Property” accurate? They don’t match the updates made to Figures 2-6 in Ch 2 (which have been verified by Nasha Flores).	Make updates in appendix B figures consistent with updates to Ch 2 Figures 2-6.	Revised. See: Appendix B – Sheets 1/6-6/6
2	Section 1.3	R. Thompson	I believe we deleted the last sentence in the FONSI “The project is needed to avoid interference with existing buried dam infrastructure along SR155” –because the need for the project in the supplement does not change	Delete last sentence in Sec 1.3	Revised. See: Page 2 – Section 1.3
2	Section 1.3	R. Thompson	Define point of presence in a footnote	Define as done in the FONSI: “ <i>! A point of presence is a physical location where two or more networks or devices share a connection, often acting as a local access point for an internet service provider.</i> ”	Revised. See: Page 2 – Section 1.3
FONSI		R. Thompson	See comment bubbles in May 27 version of FONSI		Noted.
EA Comments Sent by Reclamation (Rebecca Thompson – RThompson@usbr.gov) on 6.4.25 @ 1:42PM PDT (Re: Colville Supplemental Environmental Assessment - Revision 3 5.30.25) Reclamation Comments - Sheet 1/2					
Appendix B	Page 6/6	N. Flores	Page 6/6 of Appendix B needs to mirror the property boundary as shown in Chapter 2.3, Figure 6 on page 6.		Revised. See: Appendix B – Sheet 6/6
2	Section 1.4	N. Flores	...the first paragraph states (last sentence) the NoaNet Comm Hut being just outside of city limits of Grand Coulee in unincorporated Douglas County. This needs to be corrected to state within unincorporated Grant County.		Revised. See: Page 2 – Section 1.4
4	Section 2.3	N. Flores	...the first paragraph states the alternative route was identified on lands administered by Reclamation west of the Grand Coulee Dam. I suggest correcting this sentence to read on lands administered by Reclamation north and west of the Grand Coulee Dam.		Revised. See: Page 4 – Section 2.3

Page #	Section/Figure/ Table/Paragraph	Reviewer Name	Reviewer Comment	Proposed Change	Applicant's Response
EA Comments Sent by NTIA (Josh Fitzpatrick – jfitzpatrick@ntia.gov) on 5.14.25 @ 3:17PM PDT (RE: Colville Supplemental Environmental Assessment - Revision 2 5.17.25) NTIA Comments - Sheet 2/2					
2	Section 1.4	J. Fitzpatrick	Please speak to the no action alternative as well as the negative impacts it would have to CCT related to socioeconomics, telehealth, education and employment opportunities. We need the no action to at least compare as a baseline for each of the affected environment categories.		Revised. See: Page 4 – Section 2.1 Page 4 – Section 2.2 Page 10 – Section 3.0 – Table 3 Page 11 – Section 3.1.3 Page 11 – Section 3.2.3 Page 12 – Section 3.3.3 Page 17 – Section 3.4.13 Page 23 – Section 3.5.13 Page 25 – Section 3.6.8 Page 11 – Section 3.1.3 Page 26 – Section 3.7.7 Page 27 – Section 3.8.5 Page 28 – Section 3.9.7 Page 28 – Section 3.10.3 Page 29 – Section 3.11.5
23	Section 3.6.3	J. Fitzpatrick	Tribal Historic Preservation Officer (THPO)		Revised. See: Page 24 – Section 3.6.5
26	Section 3.10	J. Fitzpatrick	Need to say also here that negative effects are expected with a no action alternative due to lack of employment opportunities.		Revised. See: Page 28 – Section 3.10.2
27	Section 3.11	J. Fitzpatrick	Need to say no action will have negative impacts to human health and safety because lack of telehealth opportunities.		Revised. See: Page 29 – Section 3.11.5
27	Section 3.11.2	J. Fitzpatrick	Same as a above, no action alternative would lead to negative impacts related to EMS access and response.		Revised. See: Page 29 – Section 3.11.5

Appendix E

NRCS Consultation

Appendix E - Attachment 1/2

NRCS Consultation History (Sheet 1/4)

From: Niels Pedersen <Niels@WetlandResources.com>

Sent: Friday, April 17, 2025 5:40 PM

To: Max Ross <max.ross@usda.gov>

Subject: RE: [External Email] Colville Tribes Fiber Project – Occurrence on Farmlands – FPPA Eval & Process Questions

Text:

Hi Max,

Background and Introduction

I am a private consultant that is writing a NEPA Supplemental Environmental Assessment for a small portion of a larger fiber optic cable project near Grand Coulee Dam. The project is federally funded and NTIA is the lead agency.

I am looking for information about how to request evaluation of this project under the FPPA or alternately

to find out if the project is somehow not on lands covered by the FPPA or is exempt from FPPA regulations.

Project Occurrence on Farmland

-A portion of the project occurs within Farmlands of Statewide Importance and Farmlands of Unique Importance.

-For reference/scale, the following table summarizes proposed development on Farmlands, and total temporary/permanent impact area.

-The impact area consists of a mix of rocky soils that are either bare or with sparse (presumably) shrub-steppe species.

PROPOSED DEVELOPMENT IN FARMLANDS SUMMARY		
DESCRIPTION OF WORK	TEMP. GROUND DISTURBANCE	PERM. GROUND DISTURBANCE
521' AERIAL FIBER	NONE	NONE
386' BURIED (PLOW)	96.5 SQ. FT.	NONE
435' BURIED (TRENCH)	507 SQ. FT.	NONE
3,315' BURIED (BORE)	NONE	NONE
9 BORE PIT(S)	90 SQ. FT.	NONE
6 VAULT(S)	48 SQ. FT.	60 SQ. FT.
3 POLE(S)	3 SQ. FT.	6 SQ. FT.
TOTAL	745 SQ. FT.	66 SQ. FT.

Potentially Relevant Project Details

Exemptions

-This work partially occurs within WSDOT Rights-of-Way or within WSDOT easements along SR174, which were presumably established prior to 1984.

-Development also occurs outside of any known ROW on Bureau of Reclamation land between SR155 and SR 174, in proximity to the dam's high voltage transmission corridor.

Appendix E - Attachment 1/2
NRCS Consultation History (Sheet 2/4)

Subsurface Corridor

- Most of the work in Farmlands is buried fiber (installed via trench, plow, and bore), except where three new poles will be installed.
- Buried fiber will be set in conduit that is approximately 24 inches below grade and is rarely deeper than 48 inches below grade.
- It is unlikely that soil disturbance/removal and reconstruction plans in accordance with 30 CFR 823.12-14 will be prepared, unless recommended/required by NRCS

Lands Covered by the Act

- I have not yet attempted to identify the combined LESA score
- The land area has not been identified as urban according to Census Bureau maps
- The land does not appear to have “tint overprint” on USGS tops maps
- It is unclear if the project area appears as “urban-built up” on USDA important farmland maps (map could not be located)

Request for Support

- The NTIA reviewer (lead agency) for this project has indicated that “consultation with NRCS may be required” due to project occurrence in Farmlands.

-If the project occurs on lands covered by the FPPA and does not qualify for exemptions, then I plan to submit a cover letter requesting evaluation. Shall that letter be addressed to you? Or to Roylene Comes At Night? Or another NRCS point of contact?

-To initiate NRCS consultation I intend to provide basic site information (name/location/site description), attach a 500-scale overview map with soils, 100-scale detail maps with soils and project info, and an NRCS soil report for all areas within 300 feet of ground disturbance.

-Draft overview and detail maps are attached for reference.

-I am considering trying to fill out an AD-1006 Farmland Conversion Impact Rating, though it would be my first time using that form or conducting LESA.

-Are there any other exhibits or forms that I should prepare for NRCS review along with the cover letter?

-Any other advice on submitting a complete request?

-Anything else I am missing?

Please feel free to give me a call or reply by email, whichever is more appropriate at this stage.

Thanks for your time,

Niels Pedersen, PWS

Senior Ecologist

Wetland Resources, Inc.

Office: (425) 337-3174

Cell: (425) 341 3247

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Appendix E - Attachment 1/2
NRCS Consultation History (Sheet 3/4)

From: Max Ross <max.ross@usda.gov>

Sent: Friday, April 18, 2025 9:17 AM

To: Niels Pedersen <Niels@WetlandResources.com>

Subject: RE: [External Email] Colville Tribes Fiber Project – Occurrence on Farmlands – FPPA Eval & Process Questions

Text:

Hi Niels,

Thanks for reaching out and for providing detailed project information.

Citing the FPPA Manual Subpart A 523.11.E.2, this project would be considered a corridor subsurface project and is exempt from FPPA. The only condition is that the project must include a soil disturbance and reconstruction plan. The intensity and level of detail for this plan will be up to your (of the PM's) discretion. At a minimum I suggest documenting your intent to minimize surface disturbance and to mitigate any surface disturbance by backfilling excavated material.

You may reference or include this message to satisfy any permitting or regulatory requirements pertaining to FPPA.

Also, for future reference, I am the WA State POC for FPPA. I don't need formal cover letters. Just an email with project information and location is fine.

Take care,

Max Ross

State Resource Soil Scientist
Washington State Office

Natural Resources Conservation Service
1835 Black Lake Blvd. SW, Olympia, WA, 98512
c: (360) 480-6578

.....
From: Niels Pedersen <Niels@WetlandResources.com>

Sent: Friday, April 18, 2025 3:15 PM

To: Max Ross <max.ross@usda.gov>

Subject: RE: [External Email] Colville Tribes Fiber Project – Occurrence on Farmlands – FPPA Eval & Process Questions

Text:

Max,

Thanks for the quick and complete response. I have a follow-up question.

Assumptions

- This project will not disturb Prime Farmland soils, but will disturb Farmlands of Unique Importance (Ellisforde) and Farmlands of Statewide Importance (Touhey, Benco).
- 30 CFR 823.12 and .14 appear to regulate removal/stockpiling/reconstruction planning for Prime Farmland soils only.

Appendix E - Attachment 1/2
NRCS Consultation History (Sheet 4/4)

Question

Is the subsurface corridor exemption for this fiber project contingent on providing a removal/stockpiling/reconstruction plan pursuant to 30 CFR 823.12-14?

Thanks,
Niels Pedersen, PWS
Senior Ecologist
Wetland Resources, Inc.
Office: (425) 337-3174
Cell: (425) 341 3247

.....
From: Niels Pedersen <Niels@WetlandResources.com>
Sent: Friday, April 17, 2025 5:40 PM
To: Max Ross <max.ross@usda.gov>
Subject: RE: [External Email] Colville Tribes Fiber Project – Occurrence on Farmlands – FPPA Eval & Process Questions
Text:

Hi Niels,

FPPA applies equally to soils that are prime, unique, and statewide important.

The FPPA text pertaining this exemption is: *“Corridor subsurface projects (such as buried water, sewage, or electrical lines) that will develop a soil disturbance/removal and reconstruction plan (as defined in 30 CFR Sections 823.12 and 823.14) for all agricultural land uses. If a project is in cropland, as defined by USDA-NRCS, 30 CFR Section 823.15 applies and a soil disturbance/removal and reconstruction plan will be developed.”*

I interpret this to mean that if the land is not in any type agricultural land use, then the disturbance/reconstruction plan is not required. However, the FPPA exemption would still apply because the project type aligns with the purpose of the “corridor subsurface” exemption.

Max Ross
State Resource Soil Scientist
Washington State Office

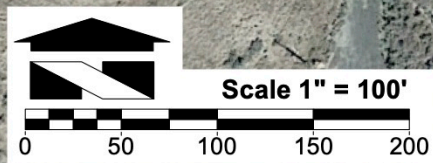
Natural Resources Conservation Service
1835 Black Lake Blvd. SW, Olympia, WA, 98512
c: (360) 480-6578

.....

INSET 1



INSET 2

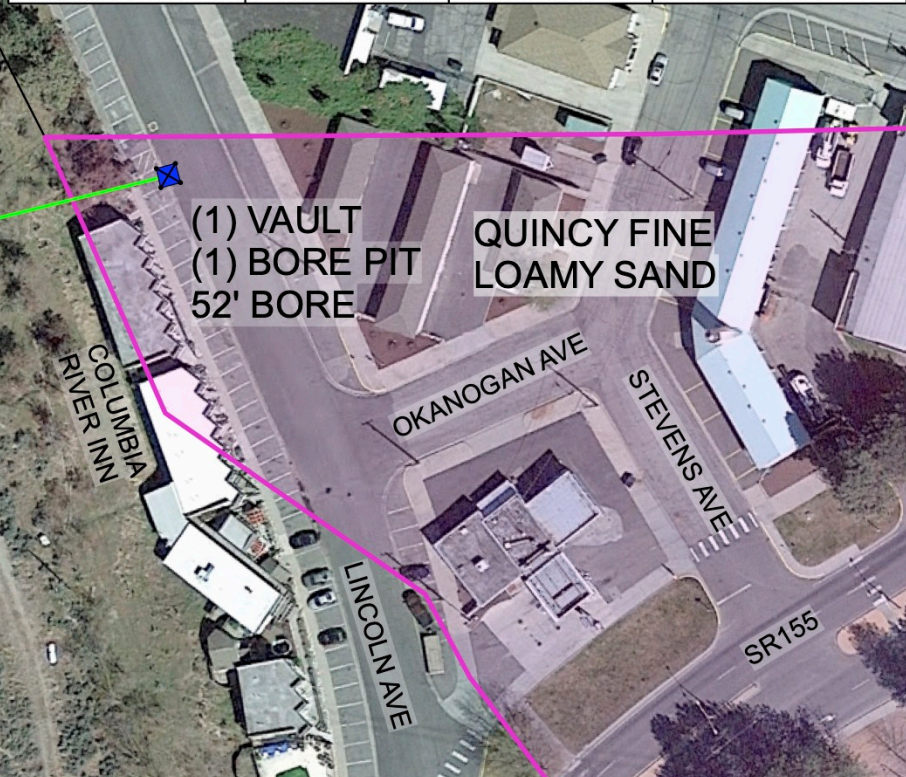


INSET 3

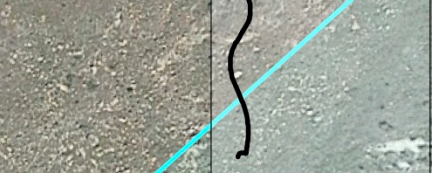
(1) BORE PIT
(1) VAULT
498' BORE



QUINCY FINE LOAMY SAND DEVELOPMENT SUMMARY			
DESCRIPTION OF WORK	TEMP. GROUND DISTURBANCE	PERM. GROUND DISTURBANCE	EX. CONDITION AT IMPACT AREA
52' BURIED (BORE)	NONE	NONE	N/A
1 BORE PIT(S)	10 SQ. FT.	NONE	EX. ROAD SURFACE
1 VAULT(S)	8 SQ. FT.	10 SQ. FT.	EX. ROAD SURFACE

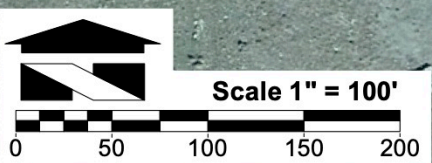


INSET 2



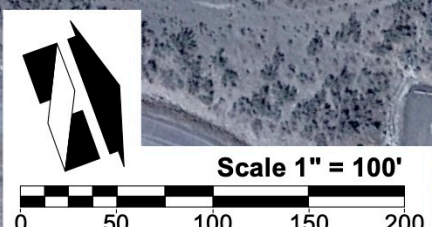
INSET 3

(1) POLE
397' AERIAL (THIS SHEET)



INSET 4

MATCH LINE
SEE INSET 5



LEGEND					
	NEW BURIED FIBER (TRENCH)		NEW VAULT		QUINCY LOAMY FINE SAND
	NEW BURIED FIBER (PLOW)		BORE PIT		TOUHEY V. FINE LOAMY SAND
	NEW BURIED FIBER (BORE)		NEW POLE/ RISER		BENCO GRAVELLY LOAMY SAND
	NEW AERIAL FIBER		NEW GUY/ ANCHOR		ELLISFORDE SILT LOAM



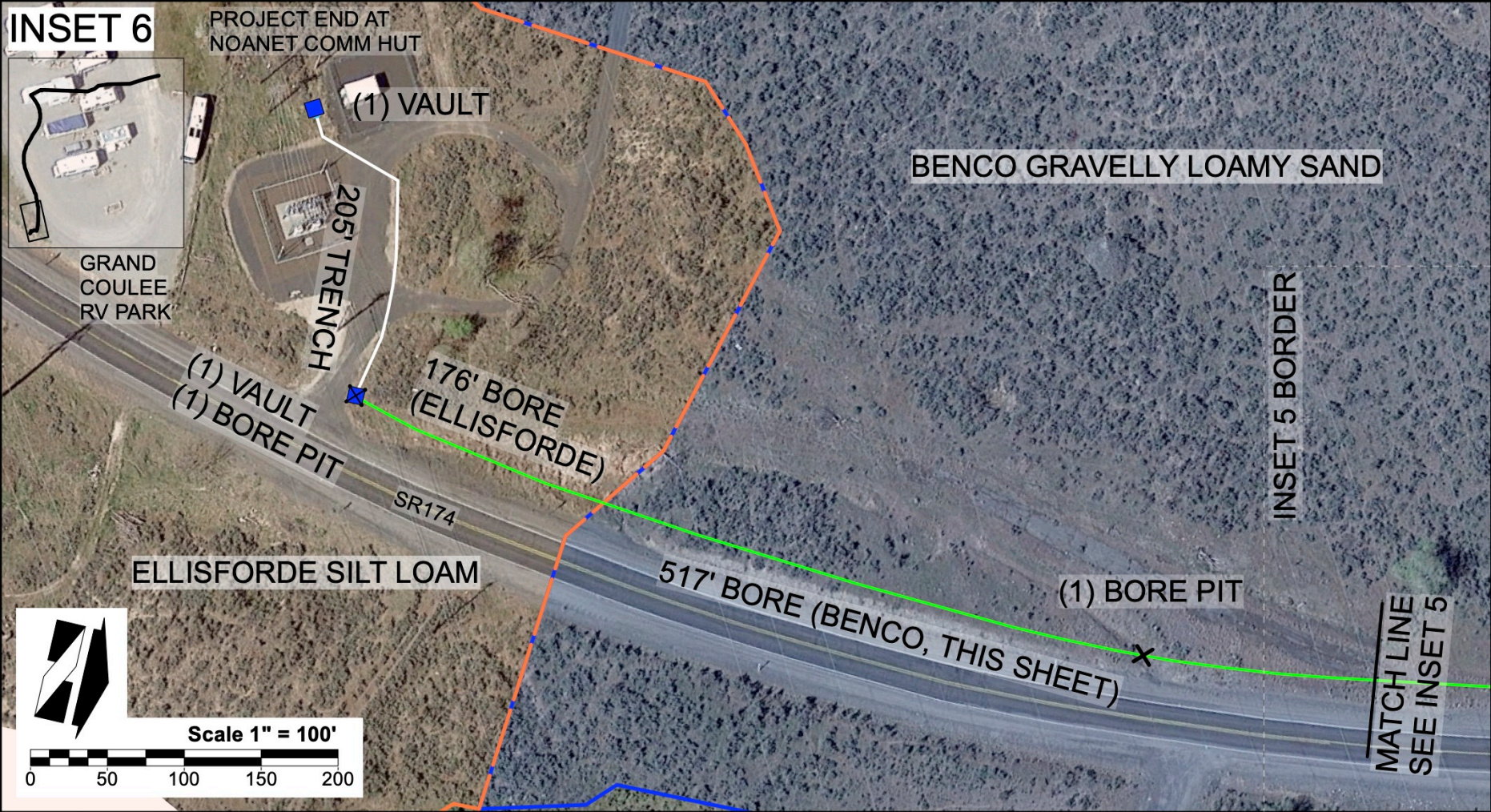
BENCO GRAVELLY LOAMY SAND DEVELOPMENT SUMMARY			
DESCRIPTION OF WORK	TEMP. GROUND DISTURBANCE	PERM. GROUND DISTURBANCE	EX. CONDITION AT IMPACT AREA
2,589' BURIED (BORE)	NONE	NONE	N/A
5 BORE PIT(S)	50 SQ. FT.	NONE	BARE/ROCKY/SHRUB



PREPARED FOR:
The Confederated Tribes of the Colville Reservation
21 Colville St
Nespelem, WA 99155

PREPARED BY: NOANET
IN PARTNERSHIP WITH:
WETLAND RESOURCES, INC.
9505 3RD AVENUE SE, SUITE 106
EVERETT WASHINGTON 98208
425.337.5716 info@wetlandresources.com

CCT NTIA 2.5GHz Wireless, Middle Mile, and Fiber to the Home Project
SUPPLEMENTAL EA
PROPOSED FARMLAND DEVELOPMENT
INSETS 1-4



ELLISFORDE SILT LOAM DEVELOPMENT SUMMARY			
DESCRIPTION OF WORK	TEMP. GROUND DISTURBANCE	PERM. GROUND DISTURBANCE	EX. CONDITION AT IMPACT AREA
205' BURIED (TRENCH)	239 SQ. FT.	NONE	IMPERVIOUS
176' BURIED (BORE)	NONE	NONE	N/A
1 BORE PIT(S)	10 SQ. FT.	NONE	BARE
2 VAULT(S)	16 SQ. FT.	20 SQ. FT.	BARE/SHRUB

BENCO GRAVELLY LOAMY SAND DEVELOPMENT SUMMARY			
DESCRIPTION OF WORK	TEMP. GROUND DISTURBANCE	PERM. GROUND DISTURBANCE	EX. CONDITION AT IMPACT AREA
2,589' BURIED (BORE)	NONE	NONE	N/A
5 BORE PIT(S)	50 SQ. FT.	NONE	BARE/ROCKY/SHRUB

LEGEND			
	NEW BURIED FIBER (TRENCH)		NEW VAULT
	NEW BURIED FIBER (BORE)		BORE PIT
	BENCO GRAVELLY LOAMY SAND		ELLISFORDE SILT LOAM

Inset Scale 1" = 100'

Drawn By: Niels Pedersen



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The Confederated Tribes of the Colville Reservation
21 Colville St
Nespelem, WA 99155

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CCT NTIA 2.5GHz Wireless, Middle Mile, and Fiber to the Home Project

SUPPLEMENTAL EA

PROPOSED FARMLAND DEVELOPMENT

INSETS 5-6

SHEET 3/3