Finding of No Significant Impact

National Telecommunications and Information Administration

QSH Parent Holdco LLC (02-40-MM503)
Nome to Homer Express Middle Mile & Hooper Bay Network Fiber Optic Cable Project

NEPA Unique ID # EAXX–006–60–02D–1764761874

National Telecommunications and Information Administration 1401 Constitution Ave., NW Washington, DC 20230

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NOTE:

This document is intended solely to assist interested parties and the grant recipient in better understanding the Middle Mile Grant Program and the requirements set forth in the Notice of Funding Opportunity (NOFO) for this program. This document does not and is not intended to supersede, modify, or otherwise alter applicable statutory or regulatory requirements, the terms and conditions of the award, or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, the terms and conditions of the award, the requirements set forth in the NOFO, and follow-on policies and guidance, shall prevail over any inconsistencies contained in this document.

FINDING OF NO SIGNIFICANT IMPACT

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION

MIDDLE MILE GRANT PROGRAM

NOME TO HOMER EXPRESS MIDDLE MILE & HOOPER BAY NETWORK FIBER OPTIC CABLE PROJECT

OVERVIEW

This document serves as the Finding of No Significant Impact (FONSI) for the following project awarded by the National Telecommunications and Information Administration (NTIA). NTIA has completed the sufficiency review of the recipient's Environmental Assessment (EA) and has determined that the project will not have a significant impact on the environment. The FONSI contains information related to the review.

Recipient Name:	QSH Parent Holdco LLC
Grant Project Name:	Nome to Homer Express Middle Mile and Hooper Bay Network Fiber Cable Project
Grant Award No.	02-40-MM503
NEPA Unique NEPA ID:	EAXX–006–60–02D–1764761874
Program Location:	Western Alaska

PROGRAM SUMMARY

The NTIA awarded a grant for QSH Parent Holdco LLC (Quintillion), through the Middle Mile (MM) Grant Program, authorized by the Infrastructure Investment and Jobs Act of 2021, Division F, Title IV, Section 60401, Public Law 117-58, 135 Stat. 429 (November 15, 2021) (Infrastructure Act or Act), also known as the Bipartisan Infrastructure Law. The MM program provides funding to encourage the expansion and extension of middle mile infrastructure to reduce the cost of connecting unserved and underserved areas to the backbone of the internet (commonly referred to as the ''last mile'') and to promote broadband connection resiliency through the creation of alternative network connection paths that can be designed to prevent single points of failure on a broadband network. The Quintillion project is called the Nome to Homer Express Middle Mile and Hooper Bay Network Fiber Cable Project, and proposed activities are scheduled to occur in western Alaska.

Quintillion completed an EA for this project in March 2026. NTIA reviewed the EA, determined it is sufficient, and adopted it as part of the development of this FONSI.

The project includes:

- Preferred Alternative: Installation of approximately 932.79 miles of submarine, buried, and aerial fiber optic cable and associated infrastructure.

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

Additional information and copies of the Executive Summary of the EA and FONSI are available to all interested persons and the public through the NTIA website (https://broadbandusa.ntia.gov/funding-programs/documentation-and-reporting) and the following contact:

Amanda Pereira

Environmental Program Officer
Office of Internet Connectivity and Growth (OICG)
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PROJECT PURPOSE AND NEED

The purpose of the project is to provide direct fiber access and communications facilities for the communities of Emmonak (population 858), Hooper Bay (1375), Naknek (464), and Igiugig (61). The project would provide broadband service to tribally- and Alaska Native Claims Settlement Act- (ANCSA-) owned land (pursuant to the Alaska Native Claims Settlement Act of 1971) and facilities. The project would also bring new resilient middle-mile capacity to the vicinity of military bases including Fort Wainwright, Fort Greely, and Eielson Air Force Base, several Alaska U.S. Army National Guard bases, and Alaska U.S. Coast Guard stations.

There is a need to connect underserved Alaskans to reliable, high-speed internet service, enabling access to distance learning, telehealth, public safety communications, and providing opportunities for economic development. Alaska ranks in the bottom 10 of the 50 United States in broadband availability, facing challenges due to having many remote rural communities lacking connections by roads or fiber backbones.

PROJECT DESCRIPTION

The following is a description of the project:

The project proposes constructing approximately 932.79 miles of middle-mile fiber optic cable from Quintillion's existing installation in Nome to Igiugig, with laterals from the mainline cable connecting the communities of Emmonak, Hooper Bay, and Naknek, followed by connecting into an existing third-party installation in Igiugig to provide service to Homer. The project is a hybrid system consisting of both submarine and terrestrial cables, components, and facilities. A variety of equipment and construction methods would be used to achieve successful installation across the cable route. These would include both trenched and surface lay marine installation; horizontal directional drilling (HDD); directional bore; shallow and standard terrestrial burial; terrestrial surface lay; aerial installation; and conduit bridge attachment. Associated infrastructure would include beach manholes, power feeding equipment, aerial poles, cable landing stations, and communication huts. This system would have a 25-year life span, although cables typically operate for longer periods.

ANALYSIS OF ALTERNATIVES

The recipient's EA includes an analysis of the alternatives for implementing the project to meet the purpose and need. NTIA conducted a review of the recipient's analysis of alternatives for implementing the project to meet the purpose and need, including a review of the "no action" alternative, where applicable. Each alternative was evaluated for impacts against the "no action" alternative and impacts from other alternatives, as a component of selecting the preferred alternative. The following summarizes the alternatives analyzed in the EA.

Alternative 1 (Preferred Alternative): As described above, installation of approximately 932.79 miles of submarine, buried, and aerial fiber optic cable and associated infrastructure.

No Action Alternative: No action was also considered. This alternative represents conditions as they currently exist. The EA examined this alternative as the baseline for evaluating impacts relative to other alternatives being considered.

Under this scenario, current conditions in western Alaska and the communities the project is proposed to service would remain unchanged, with no construction, ground disturbance, or fiber optic equipment installation. In the short term, environmental impacts would be negligible, as natural and cultural resources would remain undisturbed. However, the existing broadband infrastructure would stay limited. Connectivity would rely on copper-based DSL lines, some limited fiber optic connections, and wireless networks using 3G, LTE, and emerging 5G technologies. This limited access would perpetuate the digital divide, impeding educational opportunities, telehealth services, workforce development, public safety initiatives, and economic growth. Additionally, Quintillion's efforts to achieve a multi-layered, redundant, and resilient network "ring" to prevent future service outages would also remain constrained.

In contrast, the preferred alternative aims to expand broadband access, improving connectivity in remote areas. This would enhance educational opportunities by providing greater access to online learning resources, boost healthcare services through telemedicine advancements, and stimulate economic growth by opening new business opportunities and attracting investments. By addressing the digital divide, the project supports NTIA's goals of fostering sustainable development and empowering various communities in Alaska through greater broadband access for all in this region of Alaska.

Alternatives Considered but Not Carried Forward: Quintillion also considered the following alternatives:

Yukon Delta National Wildlife Refuge: Alternative Route Around Nunivak Island

In the design phase, an alternative marine route circumventing Nunivak Island to avoid Etolin Strait and the Yukon Delta National Wildlife Refuge (NWR) was considered but eliminated. In 2022, Quintillion completed a routing feasibility study, which identified the west side of Nunivak Island (Bering Sea) as a shipping lane. Shipping lanes are typically avoided for subsea cable installation, as slow-moving cable laying vessels pose a safety risk to other vessels traversing through the lanes. Routing around Nunivak Island would also substantially lengthen the cable route, increase the duration of installation vessel operations, and expand the overall cable footprint in the marine environment. The Preferred Alternative would cross approximately 76.7 miles of the NWR through Etolin Strait. Routing around Nunivak Island would extend the marine cable by an additional 66 miles to approximately 143 miles. Routing through Etolin Strait and the NWR would provide the most direct, operationally efficient, and cost-effective path, limiting the time the cable lay vessel must be active in the area and minimizing associated seafloor disturbance. Reducing vessel operating time would also lessen potential temporary environmental effects linked to vessel activity, including underwater noise generation, the probability of marine mammal encounters, and potential to disturb seabirds on the water surface. Shorter operations further reduce fuel use, air emissions, and the likelihood of minor operational discharges.

Naknek to Igiugig: Alternative Route through the National Park Service Alagnak Wild and Scenic River (East Route)

In the design phase, an alternative (East) route for the segment connecting Naknek and Igiugig was considered but eliminated. This alternative crossed the National Park Service (NPS) Alagnak Wild and Scenic River (WSR). This route was designed with the intention of being as direct as possible to minimize cable length and thus decrease latency between fiber optic cable end points. The proposed installation would have included shallow burial across shallow channels and vegetated areas in winter, and armored cable laid in the riverbed's main channel. The cable would have been anchored to minimize drift and damage from ice. Based on preliminary investigations, approximately 3.4 miles of the NTHE cable route would have crossed the WSR corridor. This includes crossing approximately 0.7 miles of the Alagnak River from bank to

bank, of which 0.53 miles would have been in-water. After consultation with NPS to investigate the route's plausibility and challenges, this route was eliminated because NPS determined that approving the project's construction activities inside of the boundaries of the Alagnak WSR would not align with the agency's responsibility to administer Section 7 of the Wild and Scenic Rivers Act (WSRA) of 1968 (NPS 2015). The proposed route would now avoid the WSR section of the Alagnak River.

Naknek to Igiugig: Alternative Route Across the Kvichak River (West Route)

In the design phase, a second alternative (West) route for the segment connecting Naknek and Igiugig was considered but eliminated. This route would require the greatest number of aquatic crossings (88 crossings; 40 more than the East alternative route and 42 more than the Preferred Alternative), including 15 fish-bearing stream crossings (11 more than the East alternative route and 12 more than the Preferred Alternative). Consequently, this alternative would have impacted the greatest amount of sensitive aquatic habitat to complete the project's construction activities. For this reason, the West route was eliminated from further consideration.

FINDINGS AND CONCLUSIONS

The recipient's EA analyzed existing conditions and environmental consequences of the preferred alternative, other alternatives, and the no action alternative for potential impacts in the major resource areas of Noise, Air Quality, Geology and Soils, Water Resources, Biological Resources, Historic and Cultural Resources, Aesthetic and Visual Resources, Land Use, Infrastructure, Socioeconomic Resources, and Human Health and Safety. The results of the analysis are summarized in the table below:

Resource Area	Preferred Alternative	No Action Alternative
Noise	Less than Significant Impact	No Impact
Air Quality	Less than Significant Impact	No Impact
Geology and Soils	Less than Significant Impact	No Impact
Water Resources	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Biological Resources	Less than Significant Impacts with BMPs and Protective Measures Incorporated	No Impact
Historic and Cultural Resources	Less than Significant Impact	No Impact
Aesthetic and Visual Resources	Less than Significant Impact	No Impact
Land Use	Less than Significant Impact	No Impact
Infrastructure	Beneficial Impact	Significant Impact
Socioeconomic Resources	Beneficial Impact	Significant Impact
Human Health and Safety	Beneficial Impact	Significant Impact

The sections that follow provide a brief narrative for those resource areas where there has been a potential impact indicated in the table above or provide a summary of the results of required consultation with the appropriate agency or agencies.

WATER RESOURCES

Preferred Alternative: Water resources within the proposed project area include surface and groundwater; coastal zone, estuary, and intertidal areas; floodplains; wetlands; ice; and permafrost. The fiber optic cable would be installed primarily by surface laying during frozen/winter conditions and therefore have no impact on groundwater and less than significant impacts on surface water. For fiber optic cable installation in coastal zone, estuary, and intertidal areas, HDD or trenching may be used to ensure the location is not disturbed by anchorages or natural sediment movement along the coast. Since these impacts are minor and temporary, impacts from the proposed project on coastal zone, estuary, and intertidal areas are expected to be less than significant. In general, the proposed project corridor is subject to flooding due to the low relief of the landscape and prevalence of permafrost, but proposed project activities would not increase the likelihood of flooding. Ground laid cable settles naturally into the tundra over time, and cable areas that are completed using HDD, bore, or trenching would be at a depth that should both sufficiently protect fiber optic cable from any flood-related erosion and not affect the integrity of the network; therefore, there are not expected to be impacts to floodplains or to the proposed project from flooding.

There is the potential of ice scouring to damage the cable within shallower marine segments as well as along river crossings. To minimize this possibility, the cable would be either shallow buried via trenching or protected with armoring in marine segments of the route that are less than 49-feet-deep. Once installed, there would be no temporary or permanent impacts associated with the cable. Additionally, permafrost may occur along the terrestrial portions of the route. The cable would be ground laid or trenched in the uppermost 8 inches of soil. This upper layer near the surface is the active layer that lies above the permafrost, thawing during summer and refreezing in the winter. Although the cable could be surface laid over sensitive habitat, it would avoid deep burial; therefore, no direct or indirect effects to permafrost are anticipated.

Along the terrestrial portions of the route, wetlands would be traversed by construction equipment and crew. To minimize disturbance to wetlands, cable installation in these areas would occur in the winter when the ground is frozen, and snow and ice would help protect sensitive habitat. If any work had to occur outside of the winter season in these areas, mats would be used to cover sensitive habitat for minimal surface/wetland disturbance. Although impacts on wetlands would be less than significant and would result in no net loss of wetland areas, Quintillion has consulted with the U.S. Army Corps of Engineers (USACE). The USACE completed their review and issued a Department of the Army Nationwide Permit Number No. 57 (Electric Utility Line and Telecommunications Activities) under Section 404 of the Clean Water Act (CWA) for the installation and operation of the proposed project on March 23, 2026. This permit will regulate the discharge of fill into all federally jurisdictional waters of the U.S., thus protecting surface waters and wetlands.

No Action Alternative: The No Action Alternative would not deploy the proposed project, and the water resources present within the proposed project area would not be impacted. It is assumed that the overall benefits afforded under the Preferred Alternative by adding high-speed broadband service would not be realized.

BIOLOGICAL RESOURCES

Preferred Alternative: Construction and cable laying would be expected to have temporary and minor impacts on migratory birds due to construction timing and methodology. Most of the construction would occur in winter, avoiding peak migratory and nesting season, and thus reducing the risk of disturbing nesting birds, fledglings, and migratory stopover sites. Habitat in the undeveloped areas of the proposed project route is large and intact, with ample space for migratory birds to avoid the temporary disturbances of construction activities. Additionally, the cable would be predominantly buried or surface laid, thereby avoiding the introduction of new vertical structures that could create perching or resting opportunities. Aerial installation that is planned will be located in community areas where such infrastructure already exists.

Due to the potential impacts associated with cable installation, it has been determined that the effects of the proposed project on Endangered Species Act- (ESA) listed species in the area include temporary increase in turbidity, temporary vessel presence, temporary vessel noise, and permanent aerial fiber optic cable presence. Consultation with National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) was initiated on June 26, 2024, and with U.S. Fish and Wildlife Service (USFWS) on August 16, 2024. Both agencies evaluated the anticipated impact of the proposed project to species listed under ESA. On December 12, 2024, with the implementation of BMPs, USFWS concurred with NTIA's determination that the proposed project would affect, but not likely adversely affect neither species nor critical habitat under their jurisdiction. On April 8, 2025, NMFS concurred with NTIA's determination that the project would affect, but not likely adversely affect neither species nor critical habitat under their jurisdiction.

The proposed project may adversely affect essential fish habitat (EFH) for groundfish, although these impacts would be minimal and short term. Potential adverse effects to EFH for groundfish will be mitigated based on the small overall project footprint, implementation of minimization measures to limit disturbance to species and habitat, and a lack of permanent impacts to EFH. There would be no effect to Pacific Salmon EFH for marine life stages. NMFS was consulted on September 16, 2025. On September 29, 2025, they confirmed that, while the project may adversely affect EFH for Pacific salmon and Bering Sea groundfish, effects would be minimal and temporary in nature as long as identified conservation measures and BMPs are implemented, per the NTIA-NMFS programmatic EFH consultation.

Like the marine environment, installation of the cable across freshwater, anadromous waterbodies would be temporary with minor impacts. Crossings would occur in winter, and Quintillion obtained a Fish Habitat Permit from Alaska Department of Fish and Game for the project. The proposed project may adversely affect EFH during construction only for Pacific Salmon EFH for freshwater life stages. However, based on the small overall project footprint in these waterbodies, location of crossings away from critical salmonid spawning habitat, implementation of conservation measures to limit disturbance to species and habitat, and a lack of long-term impacts to EFH, it is concluded that any impacts would be minimal and temporary.

No Action Alternative: The No Action Alternative would not deploy the proposed project, and the biological resources present within the proposed project area would not be impacted. It is assumed that the overall benefits afforded under the Preferred Alternative by adding high-speed broadband service would not be realized.

HISTORIC AND CULTURAL RESOURCES

Preferred Alternative: Impacts from the proposed project on cultural resources are most likely to occur during the construction phase of the project. Direct impacts to cultural resources as a result of ground disturbance are considered permanent impacts. Disturbance of cultural resources is possible for both ground lay areas and those where trenching or HDD are proposed, affecting both shallowly buried and more deeply buried sites. Other less likely impacts could include artifact displacement via machinery, change of the physical features in the resource's setting (*e.g.*, visual impacts), or change in access to traditional use sites by land users. Operational impacts are expected to be minor and would be limited to unforeseen damage such as trampling or displacement of surface artifacts during any repair activities that may need to occur.

Consultation under Section 106 of the National Historic Preservation Act (NHPA) included outreach to multiple federal and state agencies, local and tribal governments, tribal organizations, and affiliated communities with ties to the proposed project area as well as the public. Each entity was invited to participate in the consultation process as consulting parties and was provided with project information to engage in dialogue, share concerns, and contribute to the identification of culturally significant resources. These entities were also invited to participate in developing a Programmatic Agreement (PA) for the project. Each consulting party had the opportunity to share their views, receive and review pertinent information, offer ideas, and consider possible solutions about any of the Section 106 plans laid out in the PA.

Avoidance of adverse effects to historic properties could be achieved by moving the proposed project corridor or the location of proposed project facilities. Avoidance could also be achieved by keeping construction activities away from National Register of Historic Places-eligible properties, limiting the effect to existing demonstrated disturbance areas, or avoiding the cultural resources by boring or HDD, depending on the nature of the resource. If the proposed project could not avoid a particular cultural resource, NTIA would consult with the PA signatories to determine those measures to be implemented by Quintillion to minimize and mitigate adverse effects on historic properties identified in the area of potential effect, consistent with the stipulations of the executed PA. If NTIA determines that the adverse effect could not be avoided, Quintillion would draft a comprehensive treatment plan for each adversely affected historic property. The treatment plan would describe measures to minimize and mitigate the adverse effect of proposed project construction activities on historic properties, the way these measures would be carried out, and a schedule for their implementation. Once approved by NTIA and the PA signatories, mitigation would be conducted prior to the approval of construction within the area following the treatment plan and the protocols outlined in the PA.

No Action Alternative: The No Action Alternative would not deploy the proposed project, and the historic and cultural resources present within the proposed project area would not be impacted. It is assumed that the overall benefits afforded under the Preferred Alternative by adding high-speed broadband service would not be realized.

LAND USE

Preferred Alternative: The Preferred Alternative crosses Bureau of Land Management (BLM), USFWS, Alaska Department of Natural Resources (DNR), Alaska Transportation & Public Facilities (DOT&PF), and regional and local

tribal and government utility rights-of-way (ROW) and waterways. The Preferred Alternative will require a compatibility determination to ensure that the Preferred Alternative's use of the Yukon Delta National Wildlife Refuge (NWR) is compatible with the NWR's Comprehensive Conservation Plan. This would allow the issuance of a permit for a ROW across NWR for the construction, operation and maintenance, and decommissioning of a fiber optic network. The Preferred Alternative ROW across the NWR would be approximately 76.7 miles long. Development on BLM lands requires ROW authorization. The Preferred Alternative ROW across BLM lands would be approximately 14.6 miles long. The proposed project would be in conformance with the BLM's Bay Resource Management Plan. ROWs will be obtained for construction on DNR, DOT&PF, and regional and local tribal and government lands.

No Action Alternative: The No Action Alternative would not deploy the proposed project, and the land uses present within the proposed project area would not be impacted. It is assumed that the overall benefits afforded under the Preferred Alternative by adding high-speed broadband service would not be realized.

INFRASTRUCTURE

Preferred Alternative: Western Alaskan residences, businesses, and government buildings are currently operating without adequate bandwidth for everyday necessities in the 21st century. It is important that these citizens be able to communicate and interact effectively for purposes of economic development, government services, education, health, and for the general welfare of its people. The proposed project is anticipated to provide citizens in these communities, who are currently underserved, with access to high-speed broadband. The proposed project would provide a beneficial infrastructure impact to western Alaska.

No Action Alternative: The No Action Alternative would not deploy the proposed project, and the proposed area served by the project would continue to rely on the existing broadband options for its underserved communities. Although some portions of the area have broadband services available, it is assumed that the benefits afforded under the Preferred Alternative by adding high-speed broadband service would not be realized. The No Action Alternative would provide a significant, long-term infrastructure impact to the area if it continued to be underserved for high-speed broadband service.

SOCIOECONOMIC RESOURCES

Preferred Alternative: Alaska consists predominantly of rural communities. Providing high-speed broadband service will boost economic development, improve government services, facilitate educational opportunities, and provide higher quality health care options throughout these communities. The proposed project is anticipated to have a beneficial impact on the occupants of these rural areas, who have previously lacked access to high-speed broadband that is available in more urban areas.

No Action Alternative: The No Action Alternative would not deploy the proposed project, and the proposed area served by the project would continue to rely on the existing broadband options for its underserved communities. Without the improved broadband infrastructure of the proposed project, it is assumed that the broadband infrastructure and service would continue as it currently exists, and the benefits afforded under the Preferred Alternative would not be realized. The No Action Alternative would provide a significant, long-term socioeconomic impact to the area if it continued to be underserved for high-speed broadband service.

HEALTH AND HUMAN SAFETY

Preferred Alternative: One of the purposes of the grant program is to provide new federal funding for grants that promote the use of broadband to access telehealth resources. Providing reliable, high speed broadband service will provide higher quality health care options throughout the communities serviced by the proposed project. The Preferred Alternative would provide a beneficial health and human safety impact to the proposed area served by the project.

No Action Alternative: The No Action Alternative would not deploy the proposed project, and the proposed area served by the project would continue to rely on the existing broadband options for its underserved communities. Although some portions of the area have healthcare services available, it is assumed that the benefits afforded under the Preferred Alternative by adding high-speed broadband service would not be realized. The No Action Alternative would provide a significant, long-term health and human safety impact to the area if it continued to be underserved for high-speed broadband service.

PUBLIC COMMENT

NTIA conducted a public comment period for the EA. On December 16, 2025, NTIA published notice and the Draft EA for public comment on its website. Public notices of availability and comment were also placed in local news publications throughout the project area. Public notices were published in the Anchorage Daily News, Alaska Journal of Commerce, and Bristol Bay Times on December 14, 2025 and January 7, 2026, the Nome Nugget on December 18, 2025, and the Peninsula Clarion on December 19, 2025. The EA was made available to the public for review for 30 days on these platforms from December 17, 2025 through January 16, 2026. The U.S. Environmental Protection Agency responded as well as the Paug-Vik Inc., Limited, Levelock Natives Limited, Igiugig Native Corporation, and Bristol Bay Native Corporation providing a joint letter. A total of 7 unique comments were received, mainly focusing on construction types and impacts to wildlife and subsistence resources. Although it was believed that these issues had been addressed in the Draft EA, these comments have been responded to, and clarification/edits have been made to the Final EA, as applicable.

OTHER LOCAL, STATE, TRIBAL, OR FEDERAL PERMITS/APPROVALS

The funding of the grant is dependent on compliance with the provisions of this FONSI. This FONSI is based on the EA and results of federal and state agency and tribal consultation. The following requirements are applicable to implementation of the proposed project.

Quintillion must complete all construction-related ground disturbing activities throughout the project area in accordance with the terms and conditions of the project-specific Department of the Army Nationwide Permit Number No. 57, and any required mitigation is completed in accordance with the permit conditions. Discharge of fill into any federally jurisdictional waters of the U.S. would be considered a permit violation and act of noncompliance.

Quintillion must complete all construction-related submarine activities throughout the project area in accordance with the construction methodology and identified conservation measures and BMPs that were agreed upon during the NTIA-

NMFS programmatic EFH consultation. Work completed outside of or different than what was submitted to NMFS would be considered an EFH violation and act of noncompliance.

Per the conditions of the PA, cultural resource survey will be required for the project to provide information on prehistoric, historic, and ethnographic resources within the APE. Some locations will require a survey prior to construction, while others may be handled while construction is occurring or after. NTIA, in consultation with the consulting parties, has determined that alternative cultural resource survey methods are appropriate for specific project activities in the segments of Nome (T-1), Emmonak (T-2), Naknek (T-3), and Hooper Bay (T-7). The location specific methods and restrictions for these segments are presented in the Cultural Resources Management Plan of the PA. All other project areas or construction activities are subject to summer survey once field conditions allow for standard survey methods to be performed, and no pre-construction or construction-related ground disturbing activities may occur within those locations prior to survey.

Quintillion must obtain an executed lease for the grant of a ROW from BLM. Prior to any pre-construction or construction-related ground disturbing activities on BLM lands, Quintillion must complete a summer survey once field conditions allow for standard survey methods to be performed, per the conditions of the PA.

Prior to any submarine cable installation within NWR boundaries, Quintillion must obtain an executed lease for the grant of a ROW from USFWS.

Quintillion must obtain an executed lease for the grant of an easement on state lands through the DNR. Prior to any pre-construction or construction-related ground disturbing activities on state lands, Quintillion must complete a summer survey once field conditions allow for standard survey methods to be performed, per the conditions of the PA and as applicable for those locations.

Quintillion must obtain permission or approval to access or execute a lease for an easement or ROW on all regional, local, tribal, and private lands. Prior to any pre-construction or construction-related ground disturbing activities on regional, local, tribal, and private lands, Quintillion must complete a summer survey once field conditions allow for standard survey methods to be performed, per the conditions of the PA and as applicable for those locations.

Additionally, the grantee and its contractor(s) shall comply with all applicable environmental and historic preservation laws and regulations addressed as part of the National Environmental Policy Act review as well as those outside of it (collectively, “Environmental Requirements”). Environmental Requirements include, without limitation, any statute, law, act, ordinance, rule, regulation, order, decree, permit, or ruling of any federal, state, local, and/or Tribal government, or administrative regulatory body, agency, board, or commission or a judicial body, regulating and/or restricting impacts to and/or protection of human health, the environment, and/or historic preservation. The grantee or its contractor(s) shall be the party of record for all permits and/or approvals related to deploying, operating, and maintaining the proposed project and shall be solely responsible for obtaining any new or revised permits and/or approvals needed to deploy, operate, and maintain the proposed project.

DECISION

NTIA concludes that constructing and operating the project as defined by the preferred alternative, identified BMPs, and protective measures, will not require additional mitigation. A separate mitigation plan is not required for the project. The

analyses indicate that the proposed project is not a major federal action that will significantly affect the quality of the human environment. NTIA has determined that preparation of an EIS is not required.

Issued on April 1, 2026, by:

AMANDA PEREIRA

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