

**National Telecommunications and Information Administration  
Broadband Technology Opportunities Program  
Finding of No Significant Impact  
Massachusetts Technology Park, Massachusetts Broadband Institute, The *MassBroadband*  
123 Project in Western and North Central Massachusetts**

**Summary**

The Massachusetts Technology Park (MTP) applied to the Broadband Technology Opportunities Program (BTOP) for a grant to install approximately 1,000 miles of new fiber. The new network will connect 120 communities and approximately 1,400 community anchor institutions (CAIs). In addition, 22 interconnection points will be installed to facilitate interconnection by last mile providers. While the new network will be a hybrid of aerial and buried fiber, approximately 98% of the fiber will be installed aerially on existing poles. The proposed action passes through western and north central Massachusetts, and is referred to as the *MassBroadband 123* (Project).

The National Telecommunications and Information Administration (NTIA) awarded a grant for the Project to MTP, through BTOP, as part of the American Recovery and Reinvestment Act (ARRA). The funding must be obligated and the Project completed within three years. This timeline is driven by the laws and regulations governing the use of this ARRA grant funding.

BTOP supports the deployment of broadband infrastructure in unserved and underserved areas of the United States and its Territories. As a condition of receiving BTOP grant funding, recipients must comply with all relevant Federal legislation, including the National Environmental Policy Act of 1969 (NEPA). Specifically, NEPA limits the types of actions that the grantee can initiate prior to completing required environmental reviews. Some actions may be categorically excluded from further NEPA analyses based on the specific types and scope of work to be conducted. For projects that are not categorically excluded from further environmental review, the grant recipient must prepare an Environmental Assessment (EA) that meets the requirements of NEPA. After a sufficiency review, NTIA may adopt the EA, use it as the basis for finding that the project will not have a significant impact on the environment, and issue a finding of no significant impact (FONSI). Following such a finding, the BTOP grant recipient may then begin construction or other activities identified in the EA as the preferred alternative, in accordance with any special protocols or identified environmental protection measures.

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

The Project includes:

- Installing a hybrid broadband network of aerial and buried fiber in western and north central Massachusetts;
- Installing the approximately 1,000 mile network primarily along road rights-of-way (ROWs) and around existing buildings;
- Installing approximately 98% of the fiber aerially by attaching to existing poles, replacing poles when necessary;

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- Installing buried fiber for approximately 2% of the route miles primarily by pulling through existing conduit or trenching;
- Installing approximately 0.2% of the fiber aerially by installing new poles along portions of the route;
- Directly connecting approximately 1,400 CAIs by bringing fiber through existing utility connections;
- Leasing 300 square feet of space at existing facilities to store and operate communications equipment; and
- Installing an equipment cabinet, emergency generator, and standby fuel tank on the exterior of 22 existing buildings to establish interconnection points along the Project route.

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

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

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### **Purpose and Need**

The purpose of the Project is to bring affordable broadband service to unserved and underserved communities in western and north central Massachusetts. The Project will deploy fiber in areas where, to date, it has not been economically feasible to install telecommunications infrastructure. The Project will provide the middle-mile infrastructure needed to enable the opportunities that Internet service makes available for improved safety, well being, education, and economic growth to the businesses and residents of the project area by extending service and providing parity of service to the region. The new network will pass through six counties, providing opportunities associated with broadband technology to 388,500 households, 44,500 businesses, and approximately 1,400 CAIs.

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## **Project Description**

The Project involves installing approximately 1,000 miles of middle mile fiber and establishing 22 interconnection points throughout western and north central Massachusetts. The network will include both aerial and buried fiber. Approximately 98% of the fiber will be installed on existing overhead utility pole infrastructure and 0.2% aerially on new poles to be installed as part of this project. The less than 2% of the remaining route will be pulled underground through existing conduit or buried via trenching. Construction of the new fiber network will take place primarily in road ROWs and around existing buildings.

To place new fiber on utility poles, a bucket truck, equipped with a hydraulic basket lifting system, will be used to affix the fiber cable to the utility pole. If necessary, deteriorated wooden poles located along the roadside would be replaced in kind. New poles will also be required where the cable route departs from existing utility line routes, along approximately 4 miles of the total Project route. This situation will occur in six communities to allow cable runs to reach interconnection points; lateral cable routes to reach CAIs; to avoid an existing feature or impediment; or where continuity is needed to complete a ring along a route where utility poles are not available. New poles will be placed in a previously cleared ROW. At each new pole location, a hole will be augured, and the new pole will be installed and stabilized. The excavated material will be removed from the site and disposed of, and the surface area around the hole will be restored. Clearing of upper tree branches may be required in some locations to allow placement of the cable. New poles will typically be placed at intervals of between 175 feet and 200 feet.

Underground cable will be installed along approximately 2% of the route where there are no poles and conduit is already in place and available for use. Installation of cable in existing conduit will take place in 17 communities. In addition, a new conduit will be installed in Springfield and in Greenfield to accommodate new cable. In these urban areas, the excavator will dig a trench, the bottom of the trench will be lined with bedding material, the conduit will be placed, and the trench backfilled and compacted. The cable will be pulled through the conduit and the surface area will be restored. There will be no permanent surface level alteration to these areas.

MTP will lease 300 square feet of space at two existing facilities to store and operate equipment. The network equipment will typically operate with no operator attention and will be monitored from a remote location. The equipment will consist primarily of packaged switch gear mounted on racks and other electronics.

The Project will provide service to approximately 1,400 CAIs. The connection from the network to the institution will be either an aerial connection to the building at a utility entry point, or an underground connection into a building's lower level. For aerial attachments, the new cable will be attached to the entry point using the attachment hardware. To connect the CAIs through an underground connection, an excavator will dig a trench. Boulders and other unsuitable material

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will be removed from the site and disposed of. The conduit will be placed in the prepared trench and the area will be restored to its original condition. The foundation wall of the building will be cored to allow the conduit to pass through. Underground connections may also be made using a technique known as micro-trenching. In this case, the underground trench may be less than three inches in width and less than two feet in depth, minimizing the area of disturbance.

There will be 22 interconnection points established at existing buildings along the cable network. These will be the points where last mile service providers can gain access to the middle mile network. Electronic equipment will be housed inside the existing buildings. A new telecommunications equipment cabinet will be installed outside the building. The new exterior equipment cabinet will be approximately five feet by two feet by four feet high and set on a concrete slab. Each cabinet will have an electric system connection and a generator for emergency power. The generator will be approximately six feet long by two and a half feet wide by three and a half feet high and will be set on a concrete pad. The generator will typically use propane as a fuel. The fuel tank will be located in close proximity to the generator. A typical cylindrical propane fuel tank for this type of standby fuel supply is about four and a half feet high and about 30 inches in diameter and is set on a concrete pad. If the interconnection point location already has a generator supporting other equipment, no additional generator will be needed.

MTP does not anticipate affixing cable to an existing bridge, or installing cable via plowing, jacking, or directional drilling techniques. Although these methods are not anticipated, they may be considered to deal with unanticipated conditions discovered during Project implementation.

### **Alternatives**

The EA includes an analysis of the alternatives for implementing the Project to meet the purpose and need. NTIA also requires that an EA include a discussion of the no action alternative. The following summarizes the alternatives analyzed in the EA.

*Alternative 1 – Hybrid Fiber Installation (Preferred Alternative).* As noted in the Project Description, this effort will include installation of approximately 1,000 miles of cable and 22 interconnection points. The new fiber optic cable will be installed primarily aerially on existing pole lines and buried along approximately 2% of the route.

*No Action Alternative.* No action was also considered. This alternative represents conditions as they currently exist in western and north central Massachusetts. Under the no action alternative, new fiber middle mile infrastructure would not be constructed. Many rural communities would continue to be unserved or underserved with respect to broadband internet access. Additionally, broadband services would not be provided to CAIs in the Project area. The EA examined this alternative as the baseline for evaluating impacts relative to other alternatives being considered.

*Alternatives Considered But Not Carried Forward.* MTP considered the alternative of providing a subsidy to commercial Internet service providers to encourage them to construct the Internet

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infrastructure necessary to provide service in the Project area. Commercial providers determined that they would not be able to make an acceptable return on investment without an adequate middle mile infrastructure; therefore, this alternative was eliminated from further consideration. MTP also considered the alternative of installing an all aerial network. Installing new poles in areas with existing underground conduit infrastructure is unnecessary and does not result in any improvements to the overall network. This alternative also would result in greater conflicts with historic properties and scenic areas and was therefore eliminated from further consideration. The all underground option would have an increased impact on construction cost, the construction time, and the environmental impacts of the Project and was therefore eliminated from further consideration. MTP also considered an all wireless telecommunications network. However, wireless technology is not a viable alternative because of the limited internet connection speeds, as well as the additional construction and operational impact.

### **Findings and Conclusions**

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

#### ***Noise***

Short-term increases in ambient noise levels are expected during the Project's construction period. Noise created by machinery used during installation will be temporary and localized in nature. To reduce noise impacts, construction activities will occur during daylight hours and construction equipment will be maintained in good repair. The Project will also have minor noise impacts during long-term operation from equipment and generators installed at the interconnection points. The generators will only be activated in the event of a power loss and for periodic testing, and will be located away from sensitive receptors. Small exhaust fans contained in the electronic equipment installed within the buildings at the interconnection points will generate a negligible level of noise. Based on these considerations, no significant impacts on noise are expected to occur as a result of Project implementation and operation.

#### ***Air Quality***

Potential impacts to air quality will be both short-term impacts related to construction and long-term impacts related to operation of this Project. Installation of fiber optic cable will result in negligible fugitive dust emissions, because the fiber will be primarily placed on existing utility poles. A limited number of poles will need to be replaced and installed along the Project route. The minimal amount of trenching required for this Project will also result in a minor disturbance of the ground surface. There will also be fugitive dust emissions resulting from the installation of equipment cabinets and generators at 22 interconnection points. A short-term minor increase in the use of fossil fuel and associated greenhouse gas (GHG) emissions will occur as a result of Project construction, estimated at 4,300 metric tons of equivalent CO<sub>2</sub> emissions (below the Council on Environmental Quality [CEQ] guidance threshold of 25,000 metric tons). BMPs will

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be used to control fugitive dust during the construction phase of the Project. Additionally, all construction equipment and vehicles will be maintained in good operating condition to minimize exhaust emissions. There will also be long-term impacts to air quality from the propane fueled generators installed at the 22 interconnection points. The generators will only run during a power outage and for periodic testing. Based on implementation of these BMPs, construction and operation of the planned network is not expected to have significant adverse impacts on air quality.

***Geology and Soils***

The Project will be installed primarily in previously disturbed road ROWs and around existing buildings. Construction methods and locations were selected, among other considerations, to minimize impacts to geologic and soil resources. When replacing and installing new poles, a small amount of earth will be disturbed for pole placement. Trenching techniques also result in very minor, temporary disruption of the soils. Some vegetation may have to be removed in specific areas, thus exposing soil and allowing erosion to potentially occur. Concrete foundation pads constructed at the 22 interconnection points will disturb a small area around an existing facility. In total, the Project construction activities will disturb 452,924 square feet of soil. Temporary stabilization and surface restoration will be implemented in construction areas. In order to limit the exposure of excavated material to erosion, trenches will typically be backfilled on the same day they are opened. BMPs will also be used to control erosion and sedimentation. The potential permanent impacts of the Project include the conversion of land area through the placement of new telephone poles; new hand holes or manholes; concrete slabs for the equipment cabinets, generators, and fuel tanks at the interconnection points; and unpaved maintenance access roads along the alignment of the new pole lines. Of the total area disturbed during construction, only a small portion will be permanently altered. Consequently, the Project is not expected to result in significant adverse impacts on geology or soils.

***Water Resources***

Project construction activities could result in short-term and long-term, minor impacts on water resources within the Project area. The Project was designed to avoid water resources where practical, and implement protective measures where they are unavoidable. One unimproved road along the Project route crosses an emergent wetland. At this location, swamp mats and other protective measures will be used to minimize wetland impacts. The temporary impact area will be restored upon the completion of construction and there will be no permanent wetlands impact. The project will not impact more than 5,000 square feet of wetlands and waterways, and no in-stream work or new permanent stream crossing structures are proposed. In addition, none of the Category 1 exclusions are applicable to the Project. Consequently, the Project is covered by a Category 1 Programmatic General Permit and consultation with the U.S. Army Corps of Engineers is not necessary.

There are six locations where construction will occur in floodplains. For interconnection points within the floodplain, the volume of the equipment cabinet, the generator, and the fuel tank will detract from the flood storage volume. Typically, the floodplain will be restored to the original contours upon completion of construction. If there are any locations in which fill cannot be

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completely avoided, mitigation will be provided for the loss of flood storage volume. This will consist of providing an adequate volume of compensatory flood storage at the appropriate elevation to offset any required fill. Segments of the Westfield River within the Project area have been designated as part of the Wild and Scenic River System. In these locations, cable will be installed on existing pole lines and the width of the streams is narrow. The cable run between poles will extend from one side of the stream to the other; there will be no need to install additional poles beyond those already in place and there will be no need to mount cable on a bridge. Therefore the Project will not impact Wild and Scenic Rivers.

A straw bale erosion control barrier will be used to prevent erosion and sedimentation into any resource areas that are located within 100 feet of soil disturbance, such as new pole installation locations and new underground cable installation routes. To protect groundwater resources, a spill prevention plan will be implemented. By avoiding construction in waterways, to the extent practical, and implementing BMPs and protective measures, the Project is not expected to result in significant adverse impacts on water resources.

***Biological Resources***

MTP consulted with the Massachusetts Natural Heritage and Endangered Species Program, the Massachusetts Department of Conservation and Recreation, and the U.S. Fish and Wildlife Service (USFWS) regarding biological resources. The preferred alternative will result in minor impacts on biological resources. Noise and human activity associated with construction activities are expected to disturb some wildlife species, but these effects will be minor and temporary. Periodic tree trimming to protect aerial cable will be required along the Project route. To reduce these impacts, tree trimming will be kept to a minimum. There is also the potential for fuel spills from equipment that could threaten sensitive habitat. A spill prevention and emergency response plan will be implemented to decrease the likelihood of fuel spills in all areas of the Project. These potential impacts will be largely limited to previously disturbed road ROWs and areas adjacent to existing buildings. In a letter dated December 22, 2010, the USFWS provided a determination that the Project is not likely to affect either of the two Federally listed endangered species recorded in the Project area and the preparation of a biological assessment or further consultation is not required. Based on this analysis, MTP will be able to construct the fiber network with no significant adverse impacts on biological resources.

***Historic and Cultural Resources***

A detailed Project description was provided to the Massachusetts Historical Commission's State Historic Preservation Officer (SHPO) for review and comment. Some of the CAIs that will be connected to the network are historic buildings. Aerial cable connection to a historic building will be used if there are already aerial utility connections to the building. If there are no existing aerial connections, the cable connection will be made underground through existing or new underground conduit that will not alter the appearance of the historic property. If site limitation or other constraints require some alternative cable connection, the proponent will consult with the building owner, Massachusetts Historical Commission, and the local historical commission. As currently planned, all connections to these buildings will follow the same route as existing

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utility and cable connections and will therefore have no new impact on the properties. There are four interconnection points that will be located on or adjacent to properties that contain potential historic properties. At one interconnection point, it was determined that no new equipment is needed. At the remaining three interconnection points, measures have been taken to eliminate any potential adverse effect on these resources by locating the equipment cabinet and generator in areas of the properties that are unobtrusive or already contain modern utility cabinets and other equipment.

In addition, MTP completed an Archaeological Sensitivity Assessment and Historic Resources Assessment for the Project. Based on the nature of the interconnection facilities and their location on the sites, the Historic Resources Assessment included the determination that there would be no adverse effect on historic properties. If the proposed equipment locations or characteristics change as a result of unforeseen circumstances, the grantee will consult with the MHC and the local historical commission. In a letter dated February 3, 2011, the SHPO stated that after reviewing the Archaeological Sensitivity Assessment and Historic Resources Assessment reports prepared for the Project, they recommended a conditional determination of no adverse effect. These conditions require that any changes to the final design plans be provided to the SHPO. In addition, MTP should provide any additional effects evaluations and completed survey results to the SHPO for review and comment.

Through the Tower Construction Notification System, NTIA provided Project details to four Native American Tribes interested in the Project's geographical location and to six additional Tribes who requested notification of all new Projects. Of the ten tribes notified, no tribes responded to the notification.

The areas proposed for underground fiber installation will be screened for archaeological sensitivity. A protocol will be established for dealing with archaeological resources encountered during construction operations. If any cultural material is discovered during construction, the SHPO will be notified immediately and all activities halted until a qualified archaeologist assesses the cultural remains. If any human skeletal remains or protected Native objects are uncovered during construction, construction will stop immediately, and all consulting parties will be contacted. Based on these consultations and guidance from the commenting agencies, the Project is not expected to have significant adverse impacts on historic and cultural resources.

***Aesthetic and Visual Resources***

The MTP Project primarily involves installing fiber optic cable on existing utility poles along road ROWs. There are also some areas where installation will be accomplished by trenching cable into the ground. Fiber installation will have a short-term, minor, and temporary impact on aesthetic and visual resources due to the presence of construction equipment and limited soil disturbance, as well as limited impacts on vegetation along the proposed route. The removal of vegetation will be minimized and avoided where possible, especially in the four identified wooded areas with existing utility corridors, and all pole or underground installation sites will be restored to the greatest extent possible. The areas proposed for new pole construction would experience minor impacts on aesthetic and visual resources due to the new infrastructure. There



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are no segments of new pole line proposed along roadways that are designated as Massachusetts Scenic Byways. The installation of new poles would be along other, existing ROWs, which are not typically identified as areas of scenic significance. Consultation with the communities will lead to a determination if there are any areas of exceptional scenic value in which new poles would be installed. The 22 interconnection sites will be installed adjacent to existing buildings. MTP consulted with host communities and owners to select modern, utilitarian buildings to minimize aesthetic and visual impacts. The cabinet, generator, and fuel tank will be placed in inconspicuous locations, while providing adequate clearance from air intakes of nearby buildings. Accordingly, the preferred alternative is not expected to have a significant adverse impact on aesthetic and visual resources in the Project area.

***Land Use***

The fiber route will be installed on pole lines and existing underground conduit along existing public ROW. It may be necessary to establish new ROWs in some areas to complete cable runs to new interconnection points, reach existing anchor institutions, or avoid resource areas or other obstructions. The Project will also require placing equipment cabinets and generators at the 22 interconnection points. The overall property requirement for the interconnection points will be approximately 1,144 square feet. The property used for this Project would not typically be available for another type of use and is consistent with its current use. Therefore, the Project will have no significant impact on land use.

***Infrastructure***

Project construction activities may result in temporary impacts to existing underground utilities. Existing utilities in the Project area will be identified and marked, using research and DigSafe, to minimize potential damage. A protocol will be established for encountering unknown utilities. These potential disturbances are short-term and will subside when installation of the fiber is complete. The Project will improve communications infrastructure and is expected to result in improved transfer of information between CAIs, businesses, and individuals residing within the communities along the Project route. Overall, the Project will have a positive impact on infrastructure in western and north central Massachusetts.

***Socioeconomic Resources***

Project construction will result in temporary impacts associated with travel patterns or accessibility, but these impacts will be negligible because construction activity will not typically be based in one location for an extended period of time. The Project will provide improved communications infrastructure to residents who do not have access to broadband services western and north central Massachusetts. The network will also benefit these communities by providing broadband connections to approximately 1,400 CAIs. An increase in both short-term and long-term employment opportunities are also anticipated as a result of MTP's Project. The Project will have positive impacts on socioeconomic resources.

***Human Health and Safety***

This Project will be constructed in potentially hazardous work environments, including along roadways, bridges, confined spaces, work at height, and locations next to power lines. BMPs for

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workplace safety will be implemented to protect workers and the public. Only qualified line workers will be allowed to perform utility pole work. The construction contractor will be required to submit a work plan describing the safety procedures that will be followed. The contractor will be required to report any safety incidents. A project kick-off meeting will be required to be held with the contractor to review the work plan, safety requirements, and emergency procedures. Work crews will be required to conduct safety briefings to review the hazards of the work planned and to discuss measures to mitigate them. All work will be required to be completed in accordance with applicable codes and regulations, including National Electric Safety Codes and Occupational Safety and Health Administration requirements. All personnel will be required to use the appropriate personal protective equipment for their work. Bucket trucks for work near electric lines will be required to have proof of an annual test for electrical and structural integrity. It will be required that the integrity of a pole be confirmed before any attempt to climb it. Appropriate traffic controls will be required for work in roadways. It is unlikely that hazardous wastes will be encountered during Project installation, because most construction will be done by attaching fiber to utility poles. Prior to Project construction, known hazardous waste sites will be inventoried and avoided. A protocol will be in place for handling and disposing of any hazardous material encountered. BMPs will be used to contain and dispose of any lead paint debris generated by the Project. With implementation of these protocols, the Project will not generate any significant adverse worker or traffic-related health or safety issues.

***Cumulative Impacts***

As described above, the Project will have some minor, short-term, direct, physical impacts on many of the environmental resource areas evaluated in the EA; but none of the identified impacts will be significant when analyzed separately or together. The indirect impacts of the project are almost exclusively socio-economic and relate to the use of the new cable infrastructure provided by the Project to serve the population of the project area. These indirect impacts are expected to be largely long-term and positive. Since the direct and indirect impacts of the Project differ so markedly, there is no cumulative effect resulting from the long-term indirect impacts of system operation that will follow the short-term direct impacts of system construction. Also, since the majority of project construction will occur within existing roadway rights of way, negative cumulative effects in categories such as noise, air quality, traffic delays, and interference with existing infrastructure will arise if project construction occurs on a given section of roadway at the same time as a planned roadway improvement project or a utility improvement project. In order to minimize such potential cumulative impacts, coordination is on-going with the Massachusetts Department of Transportation and the project area Regional Planning Authorities to identify planned projects along cable routes so they can be considered in the *MassBroadband 123* construction schedule. An attempt will be made to avoid construction activity at the same time as other construction activity along the project route. At present, there are no known conflicting activities. Based on these analyses, the Project is not anticipated to have any significant cumulative impacts.

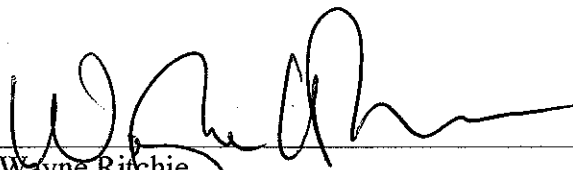
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**Decision**

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

Issued:

  
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Wayne Ritchie  
Chief Administrative Officer  
Office of Telecommunications and Information Applications  
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3/02/2011  
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Date