
INTERNET FOR ALL

Finding of No Significant Impact

*Metlakatla Power & Light
(NT23TBC0290035)*



U.S. Department of Commerce
National Telecommunications and Information Administration

Finding of No Significant Impact

National Telecommunications and Information Administration Tribal Broadband Connectivity Program

Metlakatla Tribal Broadband Project

Overview

Per the National Environmental Policy Act of 1969 (NEPA; 42 U.S.C. § 4321 et seq.) and its implementing regulations (40 C.F.R. §§ 1500-1508), this document serves as the Finding of No Significant Impact (FONSI) for the following proposed 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 proposed project will not have a significant impact on the environment. The FONSI contains information related to the review.

Recipient Name:	Metlakatla Power & Light
Grant Project Name:	Metlakatla Tribal Broadband Project
Grant Award No.	NT23TBC0290035
Program Location:	Metlakatla, Alaska

The NTIA awarded a grant to Metlakatla Power & Light (MP&L), through the Tribal Broadband Connectivity Program (TBCP), as authorized by the Consolidated Appropriations Act, 2021, Division N, Title IX, Section 905(c), Public Law 116-260, 134 Stat. 1182 (Dec. 27, 2020) (Act). TBCP provides new federal funding for grants to eligible entities to expand access to and adoption of: (i) broadband service on Tribal Land; or (ii) for programs that promote the use of broadband to access remote learning, telework, or telehealth resources during the COVID-19 pandemic. The Metlakatla Tribal Broadband Project and proposed activities are scheduled to occur in Metlakatla, Alaska and the surrounding area.

MP&L completed an EA for this proposed project in March 2023. NTIA reviewed the EA, determined it was sufficient, and adopted it as part of the development of this FONSI. Based on a review of the analysis in the EA, NTIA has determined that the proposed 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 EA and FONSI are available to all interested persons and the public through the NTIA website (<https://broadbandusa.ntia.doc.gov/node/7934>) and the following contact:

Amanda Pereira
Environmental Program Officer
Office of Internet Connectivity and Growth (OICG)
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW, Room 4878
Washington, DC 20230

Project Purpose and Need

The purpose of the proposed project is to complete the intertie connection between Metlakatla Indian Community (MIC) power grid and the electrical grid in Ketchikan. The proposed project will involve the installation of a 34 kilovolt (kV) cable with three 350 thousand circular mils (kcmil) copper conductors and two 12-strand fiber optic members that would connect Annette Island and Revillagigedo Island. The MIC is served by an island micro-grid that is not connected to any other power grid. Whereas most communities in the lower 48 states are part of an interconnected grid with multiple sources of power, MIC is completely self-reliant. All current and future economic activity on the island is dependent on a reliable supply of electricity. When power is out, nearly all economic activity ceases. The majority of this power is supplied by mountain lake reservoirs that provide hydro power. During the drought of 2016-2019 Metlakatla and surrounding communities became acutely aware of vulnerabilities in the existing power configuration, as well as the necessity to support the community with access to other energy sources. An intertie that connects Annette Island to the mainland will provide this much needed additional energy resilience.

The fiber optic connections will take advantage of this electric connectivity and provide much needed consistent and reliable broadband service to the MIC. The intertie will allow MIC to create and retain jobs on the island and open up opportunities for private investment. The proposed project will allow MIC to reach the goal of self-sufficiency, reducing reliance on outside resources while allowing the tribe to create new jobs and hire more people. MIC would be able to increase advertising to tourists through virtual tours for prospective customers and guarantees of internet access to tourists and visitors, which does not currently exist given the current lack of reliable and fast internet. With the increase of tourism advertising and traffic, the tourism department could hire an additional four (4) hourly tour guides.

MIC will need to hire a minimum of two (2) additional people to meet the demands of the new intertie itself, including managing the relationship with stakeholders as well as maintaining any physical infrastructure associated with the intertie specifically.

Additionally, MIC would be able to create new jobs through a distribution center at the old airport. Currently, the airport cannot support a distribution center due to the lack of connectivity. With the intertie, MIC could utilize the old airport for a distribution center, approximating a job creation of six (6) employees; one (1) General Manager, one (1) logistics specialist, and four (4) hourly employees.

Metlakatla's Fish and Wildlife Department would be able to expand their internship program. Currently, their internet does not support a full internship program, limiting the opportunities available to prospective students who otherwise could work while completing their education in the related fields. If the department had reliable, faster internet with greater bandwidth, the department would be able to hire two (2) more interns every year.

In regard to job creation, Metlakatla could take advantage of remote jobs not currently accessible under the current broadband conditions. This includes employment through gig-economy sites such as Upwork and Amazon Mechanical Turk. MIC would like to take advantage of remote working situations with software development and other technology-oriented jobs if there was reliable connectivity. The Employment and Training office foresees a minimum of ten (10) individuals being interested in these new jobs.

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MIC would also be able to retain jobs on island that would otherwise have been lost due to lack of reliable connectivity. Metlakatla has many residents who have moved away for education because they do not have a reliable connection to online classes. Every year, MIC anticipates at least two (2) students to remain on the island remaining employed if online education were more feasible.

Other members of MIC who are not currently living on the island have stated that they would move back to the island if there were more reliable internet. MIC estimates that at least six (6) members would move back to the island if the intertie were to exist. Finally, Metlakatla would be able to open the island for greater private investment if the connectivity were to be improved. As a designated opportunity zone, MIC would be attractive to outside investment if it had better internet and have sufficient energy resources. Two examples are given that specifically relate to the intertie. First, the distribution center that would be made possible through the intertie would allow for companies such as FedEx, UPS, and Amazon to utilize that distribution center. Additionally, Metlakatla is the ideal climate for data centers. If fiber optic were to come to the island, it would open the possibility for companies to build and operate data centers on the island. This would create jobs for Metlakatla residents and generate revenue for the tribe.

Overall, the intertie would allow Metlakatla to grow and retain at least 38 jobs as a result of the increased connectivity brought by new fiber optic infrastructure. Additionally, Metlakatla could pursue outside investment for projects that to date have not been possible with the current constraints on bandwidth. Beyond the near-term economic benefits of the proposed project, the intertie will allow MIC to grow its community and ability to become self-reliant. The Economic Development administration could help Metlakatla grow and succeed in a worldwide economy.

Project Description & Analysis of Alternatives

The MP&L EA includes an analysis of the alternatives for implementing the proposed project to meet the purpose and need. NTIA conducted a review of the recipient's analysis of alternatives for implementing the proposed 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.

- **Project Activity 1 (Preferred Alternative):** the installation of a 2.15-mile long electric/fiber optic submarine/terrestrial cable consisting of 35kV cable with three 350kcmil copper conductors and two 12-strand fiber optic members that would connect Annette Island and Revillagigedo Island; 14 miles of aerial distribution fiber optic cable from the marine landing to Metlakatla city center; and multiple fiber runs to designed service drops and hand-holes that will facilitate fiber terminations to approximately 627 premises to be served;
- **Project Activity 2 (No Action Alternative):** the proposed project would not move forward, and the MIC (an EJ Community) would remain underserved with regards to access to broadband services. No construction impacts would occur within the proposed and existing utility rights-of-way, which would be a positive for environmental impacts, but the purpose and need would not be fulfilled and none of the net benefits would occur under the no action alternative; and
- **Project Activity 3 (Alternatives Considered but Eliminated):** one alternative

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considered going completely submarine from Annette Island to Revillagigedo Island (versus the proposed 2.15-mile submarine/terrestrial route). In addition to increasing the overall length of cable significantly, this route could potentially disrupt native fishing areas, causing conflicts and potential economic losses to fishermen during installation as well as an added obstacle for ground or long-line fishing. Another alternative considered using an aerial crossing of Race Point versus burying the fiber optic cable. It was determined that an underground crossing would have less operations and maintenance impacts and costs due to vegetation clearing and maintenance, soil suitability and impacts, and repairs and construction sustainability. Both alternatives were not considered any further due to increased environmental impacts without any increased benefits.

Findings and Conclusions

The MP&L EA analyzed existing conditions and environmental consequences of the preferred alternative and the no action alternative for potential impacts in the major resource areas of Noise, Air Quality (including greenhouse gases [GHGs]), 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 (including Greenhouse Gases [GHGs])	Less than Significant Impact	No Impact
Geology and Soils	Less than Significant Impact	No Impact
Water Resources	Less than Significant Impact with best management practices (BMPs) and protective measures incorporated	No Impact
Biological Resources	Less than Significant Impact with BMPs and protective measures incorporated	No Impact
Historic and Cultural Resources	No Impact	No Impact
Aesthetic and Visual Resources	Less than Significant Impact	No Impact
Land Use	Less than Significant Impact	No Impact
Infrastructure	Beneficial Impact	Less than Significant Impact
Socioeconomic Resources (including Environmental Justice [EJ])	Beneficial Impact	Significant Impact
Human Health and Safety	Beneficial Impact	Less than Significant Impact

The sections that follow provide a brief narrative for those resource areas or aspects of those resource areas where there has been a potential impact indicated in the table above, provide a summary of the results of required consultation with appropriate agency or agencies, or other considerations of note. The sections below are not meant to provide a complete summary of the analysis performed for an entire resource area but instead a discussion of specific points of interest/consideration.

Water Resources

Preferred Alternative: The proposed project would begin at a connection point with existing aerial distribution line poles. Three new power poles and 45 feet of buried conduit would be installed in palustrine emergent wetlands to connect with the submarine cable vault above the high-water line and in freshwater emergent wetlands. The area will be trenched using excavator machinery at a depth of 30-inches cover over the conduit. If shallow bedrock is encountered, the cable line will be installed with a concrete encasement at a depth of 6 inches of cover. The trenches will not be constructed or backfilled to drain surface waters and ditch plugs will be installed to prevent this, if necessary. Any excess material not used for over-fill subsidence will be removed to a non-wetland location east of the Metlakatla Ferry Terminal. Backfill material will consist of excavated material and no imported fill is anticipated or authorized. Total impacts to wetlands will include 46 cubic yards (CY) of fill into 0.0379 acres.

Beginning below the high-tide line (HTL) near the Metlakatla Ferry Terminal and ending at Race Point peninsula (within Annette Islands Reservation waters), the proposed project will involve installing and burying 3,474 feet of submarine cable into the seafloor using mainly an underwater plow. The plow would generate a high-pressure water jet that would dig a small, narrow trench (approximately one-foot-wide by two-feet-deep), pull the cable into the trench, and then immediately backfill the trench. In areas where trenching is not possible due to the presence of boulders or bedrock, an iron guard pipe would be bolted to the rocks. Total impacts to waters of the U.S. below the HTL will include 258 CY of fill into 0.0798 acres.

Installation of the electric/fiber optic cable across Race Point peninsula will be accomplished by traditional trenching methods, approximately 1800 feet in length and at a depth of approximately 30 inches. This segment of the proposed project traverses freshwater emergent wetlands. Vaults will be placed at the two transition points from undersea to terrestrial cable and in the middle of the peninsula. Total impacts to wetlands will include 237 CY of fill into 0.4347 acres.

An additional portion of submarine cable will include installation of 3,397-linear-feet of submarine cable in Annette Reservation marine water and 2,396-linear-feet in State of Alaska waters. The segment of cable would begin at the transition vault on Race Island and would end in uplands on Mountain Point near Ketchikan. There are no jurisdictional wetland impacts at this ending point to tie into the existing power/communication lines. Impacts to waters of the U.S. below the HTL in state waters would include 177.5 CY of fill into 0.055 acres. Impacts to waters of the U.S. below the HTL in state water would include 251.6 CY of fill into 0.078 acres. Total impacts below the HTL for this segment would be 429.1 CY of fill into 0.133 acres.

The 14 miles of aerial distribution fiber optic cable from the marine landing to Metlakatla city center and multiple fiber runs to designed service drops and hand-holes are all proposed within existing, previously disturbed road and utility rights-of-way. As a result, any waterbody crossings would be spanned via aerial construction methods and no wetland resources were identified as being impacted.

The U.S. Army Corps of Engineers (USACE) determined that the proposed project is authorized by Nationwide Permit (NWP) 12, Utility Line Activities (USACE permit POA-2019-00682). Regional Conditions C, Activities Involving Trenching; D, Site Restoration for Project with Ground Disturbing Activities; E, Delineation of Project Footprint; and F, Maintenance of

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Hydrology Patterns apply to the proposed project. MIC must comply with all general terms and conditions associated with NWP 12 as well as any special conditions. In addition, MIC must implement and abide by the general and specific conditions of its Environmental Protection Agency (EPA) Section 401 Water Quality Certification for USACE permit POA-2019-00682. As a result of these BMPs and protective measures, potential impacts to water resources will be less than significant.

All requirements, recommendations, terms, conditions, BMPs, construction management requirements, and protective measures provided by federal, state, tribal, and local agencies in permits, approvals, or correspondence regarding water resources will be followed.

Biological Resources

Preferred Alternative: Two Endangered Species Act (ESA) listed species were identified within the proposed project area. In Alaska, the endangered Short-tailed albatross (*Phoebastria albatrus*) is primarily found during the spring, summer, and early fall feeding at sea, near and over deep water canyons in the Gulf of Alaska, Aleutian Islands, and Bering Sea. The closest they come near shore are depths of approximately 164–328 feet and typically in an open sea setting; therefore, they are not expected on shore or within the island/channel habitat near the proposed project area. In addition to the threatened Northern Sea otter (*Enhydra lutris kenyoni*), several other Marine Mammal Protection Act (MMPA) species, such as the Harbor seal (*Phoca vitulina*), Stellar sea lion (*Eumetopias jubatus*), Fin whale (*Balaenoptera physalus*), Humpback whale (*Megaptera novaeangliae*) were identified as transient species having the potential to exist within the general aquatic environment of the proposed project area. As part of the consultations and permits/approvals with various federal, state, and tribal agencies, MIC has agreed to use a marine species observer who will have the authority to alter work as necessary to minimize disturbance to any species that are present during construction. This includes “stop work” authority. As a result, potential impacts to these species are expected to be less than significant and avoidable.

Also, with regard to Essential Fish Habitat (EFH), MIC’s Fish & Wildlife Department and Coastal Zone Management Program (CZMP) did not identify any streams, watersheds, or salmon streams or creeks on Race Point, determined that none of the proposed work would permanently disturb or disrupt any shoreline habitat, or that would be disturbed by the construction or long-term existence of the buried cable. Although no resident populations of any endangered or threatened species were identified in the area, the extensive range of EFHs throughout the Revillagigedo Channel made avoidance of some species impossible. The anticipated lack of residual impacts to water quality and riparian habitats resulting from this proposed project and incorporating BMPs and protective measures suggest that efforts to minimize proposed project impacts to these species would not result in adverse impacts to EFHs. In addition, the inherent speed of construction and passive nature of operations for the submarine portion of the proposed project suggest that any impacts to EFHs would be negligible and short-term in nature.

All requirements, recommendations, terms, conditions, BMPs, construction management requirements, and protective measures provided by federal, state, tribal, and local agencies in permits, approvals, or correspondence regarding biological resources will be followed.



Historic and Cultural Resources

Preferred Alternative: The National Historic Preservation Act (NHPA) requires federal agencies to consult with any Federally-recognized Tribal Nation that attach religious and cultural significant to historic properties affected by an undertaking in carrying out the Section 106 review process. NTIA has teamed with the Federal Communications Commission (FCC) to use their Tower Construction Notification System (TCNS), an on-line, password-protected system that notifies all Tribal Nations and Native Hawaiian Organizations (NHOs) of proposed communication tower construction in their areas of interest. NTIA initiated tribal consultation using grantee prepared information/documentation to notify Tribal Nations of the proposed project. Through the TCNS system, NTIA consulted with the following Federally-recognized tribes:

- Hydaburg Cooperative Association
- Ketchikan Indian Community
- Metlakatla Indian Community
- Organized Village of Saxman
- Central Council Tlingit & Haida Indian Tribes of Alaska

MIC was supportive of the proposed project and tribal leadership expressed no concerns. Based on NTIA's engagement with the rest of the tribes, none of the tribes responded within the allotted time period or after follow-up and extension, indicating no interest in the proposed project. No Alaska Native traditional, cultural, or religious resources have been identified in the proposed project area.

In accordance with Section 106 of the NHPA, NTIA determines that the proposed project will have no effect to historic properties.

Please note, in the unlikely event that unanticipated historic properties, cultural artifacts, archeological deposits, or human remains are inadvertently encountered during the proposed construction and associated excavation activities, all ground disturbing activities must halt immediately, and NTIA along with the appropriate tribal and/or state agencies must be contacted, in accordance with applicable state or tribal law and federal regulation (36 C.F.R. § 800.13(b)).

Land Use

Preferred Alternative: As part of the Annette Islands Reserve, land use is determined by MIC and the Bureau of Indian Affairs (BIA). In coordination with BIA, MIC completed the Comprehensive Land Use 2028 plan, which outlines standards for land use within the Annette Islands Reserve. The proposed project has been approved by MIC Tribal Council via Tribal Resolution #18-10 as well as subsequent tribal resolutions in support of other funding opportunities (Tribal Resolution #20-09). The proposed project has been found to be consistent with both tribal leadership and the existing Land Use Plan.

The proposed project would also cross lands and waters outside of Annette Islands Reserve and managed by the State of Alaska. In accordance with Alaska Statute, the Alaska Division of Mining, Land, and Water issued a decision to issue a public utility easement to MP&L on state lands for this proposed project. The easement authorizes the use of state land for the installation, operation, and maintenance of a submerged/terrestrial electric and fiber optic cable to provide

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electric utility and high-speed data connection services to Annette and Revillagigedo Island along the submerged lands in Ketchikan, Alaska.

All requirements, recommendations, terms, conditions, BMPs, construction management requirements, and protective measures provided by federal, state, tribal, and local agencies in permits, approvals, or correspondence regarding land use will be followed.

Infrastructure

Preferred Alternative: Metlakatla's residences, businesses, and government buildings are currently operating without adequate bandwidth for everyday necessities in the 21st century. With speeds reported as below 10 megabits per second (Mbps) downstream and 1 Mbps upstream (10/1) and costing over \$300 per month for higher speeds of only 25/3, MIC is in need of new gigabit-capable broadband infrastructure. Due to the isolation of the community, it is important that the citizens of this island be able to communicate and interact effectively with the outside world for purposes of economic development, government services, education, health, and for the general welfare of its people. The proposed project will provide high-speed internet to a community that has historically experienced poor connectivity provided by the copper infrastructure of the incumbent local exchange carrier that has not adequately invested to provide broadband service to MIC. The proposed project would provide a beneficial infrastructure impact to MIC.

No Action Alternative: The No Action Alternative would not deploy the proposed project and continue to use the existing broadband infrastructure with reported speeds of less than 10/1 and expensive service. Although MIC has available broadband service, it is assumed that the benefits afforded under the Preferred Alternative by adding high-speed infrastructure would not be realized.

Socioeconomic Resources

Preferred Alternative: The population of the MIC consists of approximately 88% Alaska Natives. As of 2019, there were approximately 38% of Alaska Natives in the MIC living below 150% of the Federal Poverty Level. First, providing gigabit broadband service will boost economic development, improve government services, facilitate educational opportunities, and provide higher quality health care options throughout the community. Additionally, through the proposed project, MP&L will be able to leverage the design and 5-year plan developed to apply for eligible telecommunication carrier status with the FCC. This will permit MP&L to access funding for rural subsidization of internet and voice service allowing for the offering of high-speed service at a reasonable and substantially reduced-price rate. The Preferred Alternative would provide a beneficial socioeconomic impact to MIC.

No Action Alternative: The No Action Alternative would not deploy the proposed project and continue to use the existing broadband infrastructure with reported speeds of 10/1 and expensive service. 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 MIC if it would continue to be unserved and underserved for high-speed broadband service.



Health and Human Safety

Preferred Alternative: One of the purposes of the TBCP is to provide new federal funding for grants that promote the use of broadband to access telehealth resources. Providing gigabit broadband service will provide higher quality health care options throughout the community. The Preferred Alternative would provide a beneficial health and human safety impact to MIC.

No Action Alternative: The No Action Alternative would not deploy the proposed project and continue to use the existing broadband infrastructure with reported speeds of 10/1 and expensive service. Although MIC has healthcare services available, it is assumed that the benefits afforded under the Preferred Alternative by adding high-speed broadband service would not be realized.

Cumulative Impacts

As in other places across the country, the design of infrastructure, residential developments, and settlement patterns all contribute to the relative health and wellness of the MIC. Based on a review of the community and existing environmental conditions, future growth, land use, and goals, policies, and strategies to guide that growth, as discussed in MIC's Comprehensive Land Use 2028 plan, the proposed project would be consistent with the growth goals for the MIC (providing electrical reliability and broadband services to both growing and underserved populations of the MIC). Additionally, the construction impacts associated with the proposed project would be minimal and localized in scale and would not interfere with larger ways of life or construction projects. In the cases where other construction projects exist in the same area, the minor construction impacts resulting from the electrical/fiber installation would not increase the overall construction impacts into a level of significance. The causal impacts of the fiber installation would be improved broadband coverage to the unserved and underserved populations of the MIC. Long-term beneficial impacts of the coverage include improved access to education, health care, and emergency services. Improved access will also facilitate economic growth and provide more opportunities for the citizens of the MIC.

Public Comment

NTIA conducted a public comment period for the EA. Public notice was placed in the Metlakatla post office, local grocery store, and mini-mart. As a rural, remote community, these locations were chosen as they are places nearly every single person who lives in Metlakatla goes to often. The notice of the proposal and EA was also posted on NTIA's website for national exposure. The notice described the proposed project and comment process and provided guidance on where to view the document and federal points of contact. The comment period started on March 22, 2023 and ended on April 27, 2023. One comment was officially received by NTIA, and it was in support of deploying the proposed project.

Other Local, State, Tribal, or Federal Permits/Approvals

The grantee and its contractor(s) shall comply with all applicable environmental and historic preservation laws and regulations addressed as part of the NEPA 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

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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 proposed 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 proposed 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.

This NEPA Determination was made based on the proposed project information provided by the grantee and its contractor(s). Material misrepresentation of fact upon which NTIA relies when making this determination could affect the execution of an award and/or the pursuance of other remedies. If any information was excluded or misrepresented, or the proposed project changes materially, NTIA and all other permitting/approval agencies should be notified immediately.

Issued on July 3, 2023, by:

AMANDA PEREIRA Digitally signed by
AMANDA PEREIRA
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Amanda Pereira

Environmental Program Officer
Office of Internet Connectivity and Growth (OICG)
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW, Room 4878
Washington, DC 20230

